Appendix 1b. Review of the Forest Stewardship Council forest certification scheme

This appendix contains the full results of the review of FSC forest certification scheme against the UK Government criteria.

Executive Summary

Date of Current Assessment: May 2006 (published December 2006)

Anticipated Date of Next Assessment: May 2008

Current Status

Meets requirements for legality.

Meets requirements for sustainability.

Changes from last assessment

N/A

Source Documents

FSC-STD-01-001 (Version 4) FSC Principles and Criteria for Forest Stewardship, April 2005

FSC-STD-20-002 (version 2-1) Structure and Content of Forest Stewardship Standards, 30 Nov 2004

FSC-STD-20-001 (version 2-1) The application of ISO/IEC Guide 65:1996 (E) by FSC accredited certification bodies, 30 Nov 2004

FSC-STD-20-003 (version 2-1) Local adaptation of certification body generic forest stewardship standards, 30 Nov 2004

FSC-STD-20-006 (version 2-1) Stakeholder consultation for forest evaluation, 30 Nov 2004

FSC-STD-20-007 (version 2-1) Forest management evaluation, 30 Nov 2004

FSC-STD-20-009 (version 2-1) Forest certification public summary reports, 30 Nov 2004

FSC-STD-40-004 (version 1.0) FSC chain of custody standard for companies supplying and manufacturing FSC-certified products, 1st Oct 2004

FSC-STD-40-005 (version 1.0) FSC standard for non FSC-certified controlled wood, 1st Oct 2004

FSC-STD-40-201 (version 2.0) FSC on-product labelling requirements, 25th Nov 2004

FSC Trademark Policy Manual, Sept 2001

FSC National Initiatives Manual, Sept 1998

FSC A.C. Bylaws FSC Doc 1.1, June 2005

ASI-QMS-10-100 Quality System Manual

1. Forest Standards

1.1. Content of standards for legal compliance

Criteria	Findings	Score	L[1]	S
1.1.1 The standard requires that the forest owner/manager holds legal use rights to the forest	Adequately addressed FSC P&C 2.1 *Clear evidence of long-term forest use rights to the land (e.g. land title, customary rights, or lease agreements) shall be demonstrated.*	2	✓	
1.1.2 The standard requires compliance from both the forest management organisation and any contractors with local and national legal requirements including those relevant to: • Forest management • Environment • Labour and welfare • Health & safety • Other parties' tenure and use rights	Adequately addressed FSC P&C 1.1 *Forest management shall respect all national and local laws and administrative requirements.* FSC P&C 4.2 *Forest management should meet or exceed all applicable laws and/ or regulations covering health and safety of employees and their families.* FSC P&C 4.3 *The rights of workers to organize and voluntarily negotiate with their employers shall be guarantees as outlined in Conventions 87 and 98 of the International Labour Organisation (ILO).*	2	✓	
1.1.3 The standard requires payment of all relevant royalties and taxes	Adequately addressed FSC P&C 1.2 *All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.*	2	✓	
1.1.4 The standard requires compliance with the requirements of CITES.	Adequately addressed FSC P&C 1.3 *In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.*	2	✓	

1.2. Content of standards for sustainable variant

Criteria	Findings	Score	L	S
1.2.1 Certification standards must be consistent with a widely accepted set of	Adequately addressed Forest management standards are based on FSC-STD-01-001 FSC Principles and Criteria for Forest	2		✓

[1] L: required to meet requirements for legal, S: required to meet requirements for sustainable variant

Criteria	Findings	Score	L	S
international principles and criteria defining sustainable or responsible forest management at the forest management unit level.	Stewardship adapted to national or sub-national conditions in order to be used at the forest management unit level. Adaptation of the FSC P&C is governed by FSC-STD-20-002 Structure and content of forest stewardship standards. FSC-STD-20-002 is effective for all accreditation of certification bodies and new national and sub-national standards. Standards submitted prior to 01/01/05 are required to comply within 5 years of original accreditation.			
1.2.2 The standard must be performance-based.	Adequately addressed The FSC P&C includes both performance based and systems based elements and addresses all requirements in 1.2.3-1.2.6.	2		✓
1.2.3 The standard must ensure that harm to ecosystems is minimised. In order to do this the standard must include requirements for: a. Appropriate assessment of impacts and planning to minimise impacts; b. Protection of soil, water and biodiversity; c. Controlled and appropriate use of chemicals and use of Integrated Pest Management wherever possible. d. Proper disposal of wastes to minimise any negative impacts.	a. Adequately addressed FSC P&C 6.1 *Assessment of environmental impacts shall be completed – appropriate to the scale, intensity of forest management and uniqueness of the affected resources – and adequately integrated into management systems.* b. Adequately addressed FSC P&C 6.5 *Written guidelines shall be prepared and implemented to: control erosion; minimise forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources.* c. Adequately addressed FSC P&C 6.6 *Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organisation Type 1A and IB and chlorinated hydrocarbon pesticides: pesticides that are persistent, toxic or whose derivates remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimise health and environmental risks.* d. Adequately addressed FSC P&C 6.7 *Chemicals, containers, liquid and*	2		✓

Criteria	Findings	Score	L	S
	solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.			
1.2.4 The standard must seek to ensure that productivity of the forest is maintained. In order to do this the standard must include requirements for: a. Management planning and implementation of management activities to avoid significant negative impacts on forest productivity. b. Monitoring which is adequate to check compliance with all requirements, together with review and feedback into planning. c. Operations and operational procedures which minimise impacts on the range of forest resources and services. d. Adequate training of all personnel, both employees and contractors. e. Harvest levels that do not exceed the long-term production capacity of the forest, based on adequate inventory and growth and yield data.	a. Adequately addressed FSC Principle 7 *A management plan – appropriate to the scale and intensity of the operations – shall be written, implemented, and kept up to date. The long term objectives of management, and the means of achieving them, shall be clearly stated.* b. Adequately addressed FSC Principle 8 *Monitoring shall be conducted – appropriate to the scale and intensity of forest management – to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.* c. Adequately addressed FSC P&C 6.5 *Written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources.* d. Adequately addressed FSC P&C 7.3 *Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.* e. FSC P&C 5.6 *The rate of harvest of forest products shall not exceed levels which can be permanently sustained.*	2		✓
1.2.5 The standard must seek to ensure that forest ecosystem health and vitality is maintained. In order to do this the standard must include requirements for: a. Management planning which aims to maintain or increase the health and vitality of forest ecosystems. b. Management of natural processes, fires, pests and	a. Adequately addressed FSC Principle 6 *Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.* b. Adequately addressed FSC P&C 6.3 *Ecological functions and values shall be maintained intact, enhanced, or restored, including:*	2		✓

Criteria	Findings	Score	L	S
diseases. c. Adequate protection of the forest from unauthorised activities such as illegal logging, mining and encroachment.	*a) Forest regeneration and succession* *b) Genetic, species, and ecosystem diversity* c) *Natural cycle that affect the productivity of the forest ecosystem.* c. Adequately addressed FSC P&C 1.5 *Forest management areas should be protected from illegal harvesting, settlement and other unauthorised activities.*			
1.2.6 The standard must seek to ensure that biodiversity is maintained. In order to do this the standard must include requirements for: a. Implementation of safeguards to protect rare, threatened and endangered species. b. The conservation/set-aside of key ecosystems or habitats in their natural state. c. The protection of features and species of outstanding or exceptional value.	a. Adequately addressed FSC P&C 6.2 *Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g. nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing and collecting shall be controlled.* b. Adequately addressed FSC P&C 6.4 *Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.* c. Adequately addressed FSC Principle 9 *Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decision regarding high conservation value forests shall always be considered in the context of a precautionary approach.*	2		✓

1.3. Standard-setting process

Criteria	Findings	Score	L	S
1.3.1 The standard-setting process must be consistent with the requirements of *ISO Guide 59: Code of Good Practice for Standardisation* or the ISEAL *Code of Good Practice for Setting Social and*	Partially addressed. Three standard-setting processes exist: • The FSC P&C • Development of national or sub-national forest stewardship standards	1		✓

Criteria	Findings	Score	L	S
Environmental Standards or equivalent.	• Local adaptation of certification bodies generic forest stewardship standards. The FSC P&C are maintained by the FSC General Assembly regulated through the FSC Bylaws Sections 12, 13 and 15. The standard-setting process applicable to maintenance of the P&C is consistent with the ISEAL Code of Good Practice. This has also been verified by an audit undertaken by ISEAL. Guidelines for national standard setting are set out in FSC National Initiatives Manual September 1998. This does not specifically reference ISO Guide 59 and pre-dates the ISEAL code. In countries that have not yet developed an FSC-accredited Forest Stewardship Standard the FSC system permits certification bodies to carry out certification according to their own 'interim' standards which are adapted for use in the country with input from stakeholders. These interim standards would be superseded should a national initiative develop and have a standard accredited by FSC. Guidance for this process is provided in FSC-STD-20-003 Local Adaptation of Certification Body Generic Forest Stewardship Standards.			
1.3.2 The standard-setting process must seek to ensure balanced representation and input from the economic, environmental and social interest categories.	Partially addressed. For the FSC P&C, FSC Bylaws Sections 12, 13 and 15 require the General Assembly to be divided into 3 chambers representing economic, environmental and social/indigenous interests. Each chamber has 1/3 voting power of the General Assembly. The standard-setting process for the FSC P&C adequately addresses this criterion. National and interim certification body standards are fully derived from the P&C. For national and sub-national standard development the FSC National Initiatives Manual Chapter 12 includes requirements for participation in standard setting, this includes: 12.3.1 '*Shared ownership of process: No one particular interest group can dominate the design or implementation of the consultative process; it must be co-ordinated by a working*	1		✓

Criteria	Findings	Score	L	S
	group that is independent of any one interest group (e.g. a government, certification body, etc.) 12.3.1 *Working group procedures: The structure of the working group must incorporate a balance of interests, including, but not limited to, ecological, social and economic interest groups. The working group must have clearly defined procedures, including avenues for participation of interested groups.* 12.3.1 *Adequate participation and representation: The consultative process should attempt to reach as many stakeholder groups as possible, including those groups that may not fully agree with or endorse the concept of certification. All FSC members in the area should be contacted.*' For local adaptation of certification bodies' generic standards FSC-STD-20-003 section 3.1 requires that '*The certification body shall seek broad stakeholder comment on the adaptation of its generic standard to the area in which it is planned to be used.* ' Section 3.1.3 specifies that the certification body shall contact at least 7 stakeholder groups in the country concerned, at least one month prior to the evaluation of the forest management: a) FSC National Initiative b) Any national committee or working group that is developing national forestry standards c) The state forest service d) National NGOs that are involved or have interest in respect of social or environmental aspect of forest management e) Representatives of indigenous peoples f) Representatives of forest workers g) Representatives of forest industry Although certification bodies are required to maintain records of stakeholder comments, publicly available details of who the certification			

Criteria	Findings	Score	L	S
	bodies has consulted during the process and how the certification bodies incorporates these into a particular interim standard are extremely limited.			
1.3.3 The standard-setting and decision-making process adopted must seek to ensure: • No single interest can dominate the process; • No decision can be made in the absence of agreement from the majority of an interest category.	Partially addressed. For the FSC P&C, FSC Bylaws Section15 identifies consensus as the means of decision making and provides a methodology where voting is required '*in the case of a vote decisions shall require both the affirmative vote of a simple majority of members within each sub chamber, and 66.6% of the total voting power'* A quorum is considered to be 50% +1 eligible voters. The standard-setting process for the FSC P&C adequately addresses this criterion. National and interim certification body standards are fully derived from the P&C. For national and sub-national standards the FSC National Initiative Manual section 5.5 states that '*The way in which decisions are made within a National Initiative should be decided by the National Initiative members. However, consideration should be given to the FSC three-chamber and voting system.* *FSC recommends that all National Initiatives take decisions through consensus. A consensus decision may be reached when no party involved has registered a persistent or serious objection, i.e. all parties are willing to live with the decision.* *When disagreements exist, issues should be put to a vote. If a vote is taken, a two-thirds majority should be required for a decision (rather than simple majority).*' Local adaptation of certification bodies' generic standards, similar to the findings for 1.3.2, does not follow this process, these being developed by the certification bodies through the process detailed in FSC-STD-20-003. Section 4.5 notes that the certification body is not required to seek or develop consensus, but shall make meaningful accommodation of stakeholder concerns.	1		✓

2. Certification

Criteria	Findings	Score	L	S
2.1 Certification must be undertaken by a body whose organisation, systems and procedures conform to applicable ISO guidance, or publicly available equivalent.	Adequately addressed FSC-STD-20-001 Section 1 requires that '*The certification body shall comply with the requirements of ISO/ IEC Guide 65:1996.*'	2	✓	✓
2.2 Certification is undertaken by a body which is accredited to evaluate against forest management standards.	Adequately addressed. Certification bodies must be accredited by the FSC to certify against forest management standards. Accreditation requirements contained in ASI Quality System Manual ASI-QMS-10-100 and associated procedures (see findings for 3.1 below).	2	✓	✓
2.3 The requirements for certification audits must include assessment of systems and documentation together with verification of outcomes in the forest adequate to ensure that both system and performance requirements in the standard are being met.	Adequately addressed FSC-STD-20-007 provides requirements for certification bodies carrying out certification audits. Section 1.3c requires the certification body '*carry out sampling of sites, documents, management records and consultation with stakeholders sufficient to verify that the management system is being implemented effectively and consistently across the whole scope of the evaluation'* Section 3.4 Evaluation at the Level of the Forest Management Unit 3.4.1 Documents and Records requires that '*the auditor(s) shall identify and assess management documentation and a sufficient variety and number of records at each FMU selected for evaluation as to make direct, factual observations to verify compliance with all the indicators of the applicable Forest Stewardship Standard that are under evaluation at that FMU and for which such documents are a necessary means of verification.*' Section 3.4.2 Sites requires that '*the auditor(s) shall visit a sufficient variety and number of sites within each FMU selected for evaluation as to make direct, factual observations as to compliance with all the indicators of the applicable Forest Stewardship Standard that*	2	✓	✓

Criteria	Findings	Score	L	S
	are under evaluation at that FMU and for which such inspection is a necessary means of verification…'			
2.4 The certification audit must include sufficient consultation with external stakeholders to ensure that all relevant issues are identified relating to compliance with the requirements of the standard.	Adequately addressed FSC-STD-20-006 which sets out the requirement for stakeholder consultation. Section 1 General Requirements states that '*The certification body shall consult with a range of stakeholders who can provide relevant information as to an applicant's compliance with the environmental, legal, social and economic requirements of the Forest Stewardship Standard*.' Section 2 contains specific requirements on identification of and provision of information for stakeholders prior to the main evaluation, section 3 details the requirements on consultation during the main evaluation. Section 2.1 states that '*The certification body shall have effective procedures to identify the range of stakeholders that are likely to have information relevant to the evaluation of the applicant for certification, and/ or that may be able to put the certification body in contact with other such stakeholders*.' Section 3.1 states that '*The consultation shall include a sufficient variety and number of people affected by or involved in the applicant's forest management, to evaluate the range of situations relevant to the applicable Forest Stewardship Standard*.'	2		✓
2.5 A summary of the results of the certification audit (excluding confidential information) must be publicly available to interested parties.	Adequately addressed FSC-STD-20-009, which sets out the requirements on public summary reports. Section 2.1 Public Availability requires that '*All public summaries (including translation as specified above) shall be published on the issuing certification body's web site no later than 30 days after the certificate has been issued, and shall be available on request to the certification body*.'	2		✓
2.6 There is an accessible and functioning mechanism for dealing with complaints and disputes which is open to any	Adequately addressed. FSC-STD-20-001 Section 14 Appeals, Complaints and Disputes refers to the requirements of ISO Guide 65 Clause 7	2	✓	✓

Criteria	Findings	Score	L	S
interested party.	(Appeals, Complaints and Disputes). In addition, Section 14 requires that '*The certification body shall publish summary information about the procedures for submitting complaints, appeals and disputes, and about the certification body's procedures for handling such complaints, appeals and disputes on the certification body's website and make such information available in print on request.*'			

3. Accreditation

Criteria	Findings	Score	L	S
3.1 Accreditation must be undertaken by a national or international body whose organisation, systems and procedures are consistent with ISO 17011:2004 *Conformity assessment -- General requirements for accreditation bodies accrediting conformity assessment bodies* or equivalent.	Adequately addressed. The FSC accreditation programme is now operated by Accreditation Services International (ASI), a separate legal entity. FSC A.C. is the sole shareholder. Accreditation decisions are made by the FSC Board. The ASI Quality System Manual (ASI-QMS-10-100) and associated procedures has been evaluated as consistent with the requirements of ISO 17011.	2	✓	✓

4. Chain of custody

Criteria	Findings	Score	L	S
4.1 Assessment of chain of custody must be undertaken by a certification body operating in accordance with ISO Guide 65 or equivalent and accredited by an accreditation body operating in accordance with ISO 17011 or equivalent.	Adequately addressed. Certification bodies must be accredited by FSC to certify against chain of custody standards. FSC-STD-20-001 Section 1 requires that '*The certification body shall comply with the requirements of ISO/ IEC Guide 65:1996.*' The FSC accreditation programme is now operated by Accreditation Services International (ASI), a separate legal entity. The ASI Quality System Manual (ASI-QMS-10-100) and associated procedures has been evaluated as consistent with the requirements of ISO 17011.	2	✓	✓
4.2 There must be a certified	Adequately addressed	2	✓	✓

Criteria	Findings	Score	L	S
chain of custody in place from the forest of origin to the final certified product which provides a link between the certified material in the product or product line and certified forests.	FSC-STD-40-004 FSC Chain of Custody Standard for Companies Supplying and Manufacturing FSC-certified Products specifies the requirements for chain of custody and labelling for FSC-certified products. These include requirements for wood sourcing, production control, labelling requirements and invoicing and sales.			
4.3 If mixing of certified and uncertified material in a product or product line is allowed, the uncertified material must be covered by a verifiable system which is designed to ensure that it is from legal sources.	Partially addressed FSC-POL-40-001 FSC Policy on Percentage-based Claims May 2000 Section 3 Uncertified Contents and Controversial Sources requirements apply to: 1. Chip and fibre products with less than 70% certified virgin raw materials 2. Solid wood products in collections with less than 100% certified raw materials Section 3.2 requires companies to avoid: • Wood that has been illegally harvested • Wood from genetically modified trees • Wood from areas where there is a clear demonstration of violation of traditional, or civil rights or of serious extant disputes with indigenous peoples or other social stakeholders involving confrontation or violence • Wood from uncertified high conservation value forests Section 3.3 requires companies making percentage based claims to have a public policy to avoid illegal timber and an internal verifiable system for tracing and monitoring system its sources. Section 3.4 requires certification bodies to ensure that companies have a policy statement, and monitor that the company reports at regular intervals on the volumes and origins of uncertified raw materials. The certification body also assesses the company's internal system for tracing sources, but not the sources themselves. Currently, the FSC scheme does not provide assurance that percentage-labelled certified chip and fibre products containing more than 70%	1	✓	

Criteria	Findings	Score	L	S
	certified material products do not contain illegal timber, as there is no scrutiny of the uncertified portion. FSC-STD-40-004 and FSC-STD-40-005 are designed to assist companies buying non FSC-certified wood/ fibre materials to avoid uncontrolled wood such as illegal timber by requiring certificate holders to develop a programme for verifying that sources meet the requirements laid out in the standard. Both FSC-STD-40-004 and FSC-STD-40-005 are current. However, existing FSC chain of custody certificate holders are not required to meet both standards until 1st January 2007. [Note: New versions (Version 2-0) of *FSC-STD-30-010 FSC Controlled Wood standard for forest management enterprises* and *FSC-STD-40-005 Standard for company evaluation of FSC Controlled Wood* have recently been approved, with effective date for the latter extended to 1st January 2008 for some users.]			
4.4 If mixing of certified and uncertified material in a product or product line is allowed and the proportion of uncertified material can exceed 30%, then the uncertified material must be covered by a verifiable system which ensures that it is from sustainable forest sources where the requirements for sustainability set out in criteria 1.2.3 – 1.2.6 above are being met.	Inadequately addressed. As detailed in 4.3 the FSC system requires avoidance of illegal timber, GM trees, wood from areas with violation of rights or rights disputes and from uncertified HCVF within the uncertified portion. It does not provide any guarantee that the uncertified portion is from sustainable sources.	0		✓
4.5 There is a clearly defined mechanism for controlling all claims made about the certified nature of products which ensures that claims are clear and accurate and that action is taken to prevent any false or misleading claims.	Adequately addressed. The FSC Trademark Policy Manual, provides guidance on the use of FSC trademark for on-product and off-product claims. Section 1.7.3 specifies that '*FSC accredited certification bodies are responsible for approving and controlling use of the FSC Trademark their certificate holders. Certification bodies must exercise this control in the form of a sub-licence or equivalent contractual document signed by the certificate holder*.'	2	✓	✓

Criteria	Findings	Score	L	S
	Section 1.7.6 requires that '*Certification Bodies and Nominated Agents are required to report unapproved non-conforming uses of the Trademark to FSC International. FSC International will evaluate the material to determine whether further action, including legal action, is required.*' In addition, FSC-STD-40-201 FSC On-product Labelling Requirements specifies the requirements for the correct on-product use of the FSC label and related claims.			
4.6 If recycled material is used there must be a verifiable system in place which is designed to ensure that recycled material is from the following categories: • Pre-consumer recycled wood and wood fibre or industrial by-products but excluding sawmill co-products • Post-consumer recycled wood and wood fibre • Drift wood	Fully addressed. FSC-STD-40-004 specifies the requirements for chain of custody and labelling which include FSC "recycled" products. These include wood sourcing, production control, labelling requirements and invoicing and sales. Section 6.5 contains the specifications for reclaimed wood sourcing. It requires that '*all post-consumer reclaimed material shall be independently verified with respect to its quantity and compliance with the specified definitions, or, if the company is purchasing unverified post-consumer reclaimed material, then the company shall be demonstrate to the certification body that all material claimed to be 'post-consumer' meets the definition of 'post-consumer reclaimed material' used for this standard'* Annex 2 contains categories of reclaimed wood material and excludes industrial scrap and by products commonly reused within an original manufacturing process	2	✓	✓