



## Principles and Criteria Review

### Briefing Paper

#### The Primacy of Natural Forest?

**Bonn, 08<sup>th</sup> November 2010**

This paper was produced by the P&C Review Working Group to explain its approach to and address stakeholder concerns raised in relation the scope of FSC certification. The paper will also serve as a basis for further discussions at the P&C Review Workshop on the 15<sup>th</sup> and 16<sup>th</sup> of November 2010. The P&C Review Working Group does not pretend that this could be The Last Word on the issue.

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In line with its terms of reference, the tasks of the P&C Review Working Group are mainly –

- to clarify the FSC requirements, so as to reduce disparities in evaluations by ASI-accredited conformity assessment bodies;
- to shift the wording of Criteria towards outcomes where practicable; and
- to minimize the variety of interpretations found in national forest stewardship standards and national adaptations of the generic standards developed by the conformity assessment bodies.

#### What is the issue as perceived by some FSC stakeholders?

This is a signature issue for some members and stakeholders belonging to the environmental chamber. The arguments raised in comments on or related to the draft revisions of the P&C may be summarized as follows, but it should be recognized that there are diverse views within this chamber:

"The rate of loss of natural forest by deforestation and forest degradation is far greater than the increase in certified natural forest. FSC was created primarily to conserve natural forest, and should not support or engage in any activity which diminishes the area or quality of natural forest. The FSC website ([www.fsc.org/naturalforests.html](http://www.fsc.org/naturalforests.html)) says that "FSC does not encourage exploration [meaning, 'harvesting'] of natural forests".

Some stakeholders have taken this website statement to mean that FSC should not and will not certify logging in primary / pristine forest, and are concerned that such certification is continuing. However, this is not a unanimous view in the environmental chamber, and there is no specific policy motion to a FSC General Assembly on this subject.



“Why is the revision of the P&C apparently refining the requirements for logging and other forms of harvesting, and clarifying the conditions for transformations of vegetation? The revision should instead focus on preservation of the pristine forest, restoration of damaged forest, and enhancement of carbon storage.”

Pristine is used here in the dictionary senses of “old; showing no significant human influence; of, relating to, or typical of the earliest time or condition; primitive or original”.

### **What is the response by the FSC Working Group?**

The FSC statutes and by-laws, as well as FSC global strategy 2007, express FSC’s coverage as ‘the world’s forests’, without differentiation by type of forest. FSC documents have used the generic term ‘forest’ to mean all the vegetation inside the boundary of the Management Unit which is evaluated for quality of management. The kinds of vegetation which could be evaluated for certification were discussed in FSC-DIS-01-001 and confirmed by the FSC Board in FSC-POL-10-004 (both 2005) to be all tree-related vegetation and relevant open space inside that boundary. Other types of vegetation may be considered if they contribute to the mission of FSC. No explicit preference was given to a named type of vegetation, such as pristine or natural forest. The Organization has to manage all that geographic space, and the P&C therefore have to cover all the possible kinds of vegetation and all the possible kinds of legitimate management objectives.

Natural or pristine forest may contain more biodiversity and habitat diversity and more intricately related ecological functions than other types of forest and tree vegetation, and so may more easily comply with the whole suite of FSC requirements in the P&C. However, The Organization applying for or holding FSC certification may have objectives which are better matched by other types of forest but which can still comply with FSC requirements.

The same section of the FSC website also says “To withdraw from applying the FSC standards to logging in natural forests would not end further exploration [harvesting] of natural forests but only sacrifice a tool to promote equitable consideration of social and environmental issues in forestry where it matters most.”

The revised P&C cover Management Units which have tangible services and products as outputs, and Management Units which may have no aim to produce tangible outputs but which serve as totally protected areas (TPAs). However, the WG has not been made aware of progress with the feasibility study mentioned in policy motion 44 of GA 2008 and so cannot address possible outcomes from such a study.

Criteria are specified in Principle 9 for the extra care required in areas which may or do contain or are needed to support high conservation values. A pristine forest may contain HCVs such as rare, threatened or endangered ecosystems and so would be protected as HCV-3 according to revised Criterion 9.1. Large forest areas, major components of landscapes, may qualify for protection as HCV-2.



Extra care is also needed in relation to FSC Controlled Wood in areas which are Biodiversity Hotspots (as promoted by Conservation International - CI), Global 200 Ecoregions (as promoted by World Wide Fund for Nature - WWF), Frontier Forests (as promoted by the World Resources Institute -WRI), or Intact Forest Landscapes (IFLs, as promoted by Greenpeace, WRI and other ENGOs); FSC-DIR-40-005 (July 2010, page 7), FSC-STD-40-005. An ambiguity appears to have been inserted in these documents by inclusion of IFLs. As a result of this, FSC appears to accept the possibility of timber originating from an IFL, while the formal definition of IFL prohibits logging. Mention of IFL in these documents thus appears to be driving FSC towards the preservation of pristine forest, in parallel with the above-cited phrase on the FSC website: “FSC does not encourage exploration [meaning, ‘harvesting’] of natural forests”.

Apart from these two instances, and the control on conversion of natural forest in the current wording of Criterion 10.9, there does not seem to be any FSC document which explicitly favors natural forest over other types of vegetation.

Many of the Criteria provide protection for the environmental values commonly found in natural forests (and in other vegetation types), but there are no FSC policy statements which suggest that FSC’s primary focus is on natural forests.

The WG **concludes** that there is no FSC documentation to support a claim for the primacy of natural forest in the FSC forest certification system, in the sense that the FSC system is aimed primarily at the preservation and restoration of natural forest. The WG **recognizes** that there was a Board-level discussion in 2005, and concludes that natural forest is covered in the P&C adequately alongside other types of vegetation.

The WG **concludes** that the P&C as a whole and Principles 6 and 9 in particular contain Criteria which assure that all sensitive features are identified and protected from adverse management activities. It is not the name ‘natural forest’ which is important but what the area contains, what is the status of those contents, and how well is The Organization ensuring that the sensitive features are protected and secured, and where appropriate enhanced.

Stakeholder concerns about Restoration and Enhancement of carbon storage are treated in other FSC Briefing Papers.

The WG **suggests** that FSC members should ask themselves two questions:

- a. “Do you agree with / are you convinced by the argument in this paper?”
- b. “If you are not convinced, can we amend the wording of this Paper or the P&C to arrive at a mutually satisfactory understanding?”
- c. “If you do not think that we can simply edit the P&C wording, would you be willing to present a statutory motion to the GA2011 in which you propose specific, Criterion-related, alternatives and/or a policy motion to request a formal Policy paper from FSC.”

## Sources



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The mission statement according the FSC by-laws: [http://www.fsc.org/fileadmin/web-data/public/document\\_center/institutional\\_documents/1\\_1\\_FSC\\_By-Laws\\_2009.pdf](http://www.fsc.org/fileadmin/web-data/public/document_center/institutional_documents/1_1_FSC_By-Laws_2009.pdf)

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[http://www.fsc.org/fileadmin/web-data/public/document\\_center/international\\_FSC\\_policies/policies/FSC\\_POL\\_10\\_004\\_EN\\_Scope\\_of\\_FSC\\_PC\\_2005.pdf](http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/policies/FSC_POL_10_004_EN_Scope_of_FSC_PC_2005.pdf)

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[http://www.fsc.org/fileadmin/web-data/public/document\\_center/Current\\_consultations/FSC-DIS-01-001\\_Scope\\_P\\_C\\_2005.pdf](http://www.fsc.org/fileadmin/web-data/public/document_center/Current_consultations/FSC-DIS-01-001_Scope_P_C_2005.pdf)

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[http://www.fsc.org/fileadmin/web-data/public/document\\_center/international\\_FSC\\_policies/standards/FSC\\_STD\\_40\\_005\\_V2\\_1\\_EN\\_Company\\_Evaluation\\_of\\_Controlled\\_Wood.pdf](http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/standards/FSC_STD_40_005_V2_1_EN_Company_Evaluation_of_Controlled_Wood.pdf)

FSC-DIR-40-005 FSC Directive on FSC Controlled Wood (2010):  
[http://www.fsc.org/fileadmin/web-data/public/document\\_center/international\\_FSC\\_policies/Directives/FSC-DIR-40-005\\_EN\\_Controlled\\_Wood\\_Directive.pdf](http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/Directives/FSC-DIR-40-005_EN_Controlled_Wood_Directive.pdf)

The current Principles and Criteria: [http://www.fsc.org/fileadmin/web-data/public/document\\_center/international\\_FSC\\_policies/standards/FSC\\_STD\\_01\\_001\\_V4\\_0\\_EN\\_FSC\\_Principles\\_and\\_Criteria.pdf](http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/standards/FSC_STD_01_001_V4_0_EN_FSC_Principles_and_Criteria.pdf)