### Appendix B. Selected Issue Specific Comparison FSC and SFI

2010 FSC-US and 2015 SFI Indicators Regarding Clearcuts (for plantation/even age management)

	Max (acres) Opening With no Retention	Max average Opening Size with No Retention	Max Opening with 20-30% Retention	Max Average Opening With 20- 30%	Adjacent Stands	Overarching Focus
FSC	2-80 depending on region and forest type <sup>1</sup>	2-40	20, 40, 60, 80, or undefined depending on region and forest type <sup>2</sup>	Retention  20-100 depending on region and forest type <sup>3</sup>	At least 10 feet, 50% edge canopy closure, or advanced successional (except southern pine plantations which can be early	Harvests are designed to resemble components of natural disturbance and maintain habitat needs of wildlife species
SFI	None	120	None	None	successional) At least 3yrs and 5 feet tall	Planting or regeneration rapid site "green up"

### 2010 FSC-US and 2015 SFI Riparian Buffer Indicators

	Minimum Numerical Harvesting Buffer for Perennial Streams	Water Quality Objectives	Habitat	Prescriptions	Overarching Focus
FSC	Rockies – 50ft Ozark, Mississippi –75ft Appalachia –80ft Pacific Coast –100ft <sup>4</sup> Southwest—50ft  (None in Southeast, Lake States, and Northeast apart from legal requirements and BMPs)	Temperature Sedimentation Min chemicals Shade Natural cycles	Recruit woody debris & litter Timing and volume of water flows Fish passage Feeding, cover, travel, and breeding Maintains aquatic and upland plant and animal habitat	Written plan before harvest Minimize soil disturbance No harvest in buffer Filter strips Protect bank Minimize floodplain disturbance Minimize roads and crossings Temporary crossings restored No logging on steep slope Restrict grazing	Enhance or restore aquatic and upland habitat, similar to natural systems
SFI	None, but must comply with legal requirements and voluntary state BMPs	Protect	Identify and protect	Map, Water body protection plans, Identify non-forested wetland, Minimize impact of roads and skids	Protect and implement BMPs

<sup>&</sup>lt;sup>1</sup> This table poorly captures FSC requirements as the FSC-US FMS Appendix C sets out differing standards by region for cutting under even-aged management. In the Ozarks, openings without retention are limited to 2 acres and shelterwood cuts with 20-30% retention are limited to 20acres. In Appalachia harvest openings with no retention are limited to 10 acres. Mississippi region requires retention in cuts larger than 20 acres. In the Pacific Northwest, any opening larger than 6 acres requires 10% basal area retained whereas Guidance in the Southeast suggests that clearcuts up to 80 acres may be allowed where lesser cut would not provide enough timber volume to secure a timber sale. Other regions have other maximums: Appalachia (10), Ozark-Ouachita (2-20), Mississippi (20), Rocky Mountain (even age only for restoration), Northeast and Southwest (Harvests protect native natural regeneration).

<sup>&</sup>lt;sup>2</sup> Maximum individual openings with retention specified for Ozark-Ouachita (20), Mississippi (40), Pacific Coast (60), and Southeast (80 unless 40 is economically viable)

<sup>&</sup>lt;sup>3</sup> Average opening does not exceed 100 acres. Pacific Coast limits average openings to 40 acres. By default, there will be a lower average in areas with lower individual cut limits: Ozark-Ouachita (20), Mississippi (40), and Southeast (80)

<sup>&</sup>lt;sup>4</sup> The FSC-US FMS Appendix E sets factors for assessing buffer width. Appalachia, Pacific Coast, and Mississippi Regions vary based on stream class; Appalachia, Ozark, Mississippi and Rockies Regions vary based on slope.

2010 FSC-US and 2015 SFI Indicators Regarding Forest Conversion and Plantations

	Restrictions on Conversion to	Restrictions on Plantation Management	Restoration	Rotation/
	Plantation or Non-forest		of Plantations	Harvesting
FSC	Leads to long term	Thinning minimizes damage to residual trees.	10-25% on	Maintains late
	conservation benefit	Native species preferred, and in some cases required	private land	successional
	Restore to national	(e.g. no use of exotic species in SE US)	100% of	habitat.
	conditions	Distribution of plantations maintains natural mosaic	public land	Retains habitat
	No conversion after 1994	Openings without retention limited to 40 acre	on forest	diversity
		average and 80 acre maximum (except in Pacific	soils	
		Coast where retention is required in all openings)		
		Average for all openings with and without retention		
		does not exceed 100 acres		
		Openings larger than 80 acres only when justified by		
		credible scientific analysis and retention resembling		
		natural disturbance		
SFI	None	None specific to plantations	None	Promote
		120 average opening?		habitat
				diversity

# 2010 FSC-US and 2013 SFI Indicators Regarding GMOs

	Use GMOs
FSC	Prohibited
SFI	Prohibited

# 2010 FSC-US and 2015 SFI Indicators Regarding Protected Areas

	Identification	Habitats	Protection	Documentation
FSC	Gap analysis, identify and establish representative sample areas, survey for listed, candidate, G1-G3, S1-S3, and N1DN3 species or assume presence, report findings	All	Permanent protection of representative sample, conservation zones support viable populations	Document road building for minimized impact, public review of HCVF areas with maps and description, comments incorporated into plan
SFI	Program to locate G1-G2 species through credible system, use NatureServe or equivalent	Special sites and sites with special conservation value including vernal pools of ecological significance, and sites with species at risk	Protect/manage	Map and catalogue special sites

# 2010 FSC-US and 2015 SFI Indicators Regarding At-risk Species

	Identification	Protection	Restoration
FSC	Survey for all listed, candidate, (G1-G3, S1-S3,	Permanent protection of representative	Public forest
	and N1DN3) species or assume presence, report	sample, conservation zones support viable	designed to meet
	findings	populations	recovery goals
	Habitats delineated on maps	Hunting, fishing, trapping controlled	
SFI	Plans to locate G1 and G2 species though credible system, Natureserve or equivalent Determine viability	Program to protect known sites with viable threatened and endangered species (all excellent/good viability, some fair, not all poor), Participate in local or regional conservation planning	None

2010 FSC-US and 2015 SFI Indicators Regarding Old Growth

	Identification	Protection	Restoration
FSC	Old growth is normally mapped as HCVF	Only restoration management on public land Maintains structure, composition and processes Legacy trees not harvested Buffered as necessary	A portion of forest restored where old growth would naturally occur
SFI		Support and participate in programs for old growth conservation in region	None

2010 FSC-US and 2015 SFI Indicators Regarding Carbon

	Emissions	Management	Reporting
FSC	None	Identify and define appropriate measures for maintaining and/or enhancing carbon storage and sequestration	None
SFI	None	Management planning and long term resource analysis reviews carbon storage	None

2010 FSC-US and SFI Indicators Regarding Monitoring

	Protocols	What is Monitored	Evidence Required	Public Access
FSC	Written	Regeneration, structure, unanticipated loss, NTFP yield, disturbances, water, habitat, soil, fire, pests, sensitive species, invasives, road system, employment, local jobs, stakeholder responses, differences between expectations Social impact, environmental impact, and representative sample areas assessed		Summary upon request
SFI	Verifiable system identifies areas for improvement	Water quality BMPs, conformance to other BMPs, evaluation of BMPs, progress toward meeting standard	General evidence of conformity, annual report	Audit summary with evidence

2010 FSC-US and 2015 SFI Indicators Regarding Public Reporting and Consultation (Private Forests)

	Planning	Notification	Review	Appeal	Address Concerns
FSC	Opportunities for	Notified of effects	Opportunities	Accessible	Attempt resolution through
	people affected to	in time to express	to review	appeal process	communication/negotiation before
	participate in planning	concern			legal action
SFI	Public involved <b>on</b>	Appropriate	Summary	None	Respond to inquiries, address
	government land	contact	audit report		nonconforming practices
		Annual reporting			Regional Implementation Committee
		of conformance			may have process to respond to
					concerns aimed at standard revision

2010 FSC-US and SFI Indicators Regarding Education and Training

	Training	Public Education	Landowner Education	Promotion of SFM
FSC	Provide adequate training for safety	Contribute to education about forestry and forests	None	None
SFI	Appropriate training for SFM, enhanced utilization, and compliance with SFI standard, including contractors Foster improvement in professionalism	Encourage public and forest community to participate in practice of sustainable forestry; publically report progress Support and promote outreach, education, and involvement	Educate non- certified landowners about SFM, and species	Support development of educational materials Participate in other efforts to promote conservation Periodic promotion such as tours, trails, pubs, support for forestry organizations

	Right to Organize	Wages	Safety
FSC	Freedom to associate and	Meets or exceeds local norms	Program addresses equipment maintenance,
	advocate		posted safety guidelines, contracts include
	Develop dispute resolution		safety, records kept
SFI	Obey law, training on worker	Written commitment to comply	Written commitment to comply with OSHA
	rights	with social law prevailing wage,	Training on OSHA
		Training on wage rules	

2010 FSC-US and SFI Indicators Regarding Indigenous Rights

•	Use Rights	Consultation	Traditional Knowledge
FSC	Access and use rights documented, identified on maps	Identify and contact American Indian groups via designated tribal representatives for legal or customary use rights, ensure no impact on rights, protocols jointly developed and signed by tribes in formal consultation, informed written consent, identify special sites and protected areas	Identify knowledge used, fairly compensate for use
SFI	Identify and protect culturally important sites	Confer with affected indigenous peoples on public lands	Understand and respect

### Appendix C. Issue Specific Comparison FSC P&C and PEFC

2012 FSC P&C and 2010 PEFC Indicators Regarding Forest Conversion and Plantations

	Restrictions to conversion to plantation or non-forest			Plantations converted from	
	Extent	Benefit	Ecologically important	Laws	natural forest qualify for
			/ high conservation		certification when
			value forests		conversion
FSC	Affects limited area	Produces significant long-term conservation benefit	Does not damage HCV areas (6.9)	Complies with applicable laws, regulations, and nationally-ratified treaties, conventions and agreements	Occurred before Nov. 1994, not the fault of the organization seeking certification, affects limited area, and produces long-term conservation benefits (6.10)
PEFC	Affects small proportion of forest type	Long-term conservation, economic and social benefit	Does not damage ecologically significant areas, significant habitat, species, or socially significant areas.	Complies with relevant policy and legislation, land-use planning processes.	After Dec 2010: Only when "justified circumstances" outlined in 5.1.1 are met. Before Dec 2010: Not specified

The PEFC international standards focus on bounding the "justified circumstances" for forest conversion whereas FSC limits the timing and "extent" of conversion. PEFC focuses more on the type of forest being converted rather than the area, and specifies that the benefits of conversion must include economic and social benefits (in addition to long-term conservation benefits). FSC prohibits conversation of forest area with significant cultural or social value.

2012 FSC P&C and 2010 PEFC Indicators Regarding GMOs

<u> </u>				
	Use GMOs	Number		
FSC	No - no use at all within the management unit	10.4		
PEFC	No – no use at all within the management unit	5.4.7		

By adding the phrase "within the management unit," FSC implies that the organization being certified may still use GMOs in areas not being considered for certification. This is a weakening of the old standards which strictly prohibits all use of GMOs, carrying with it the interpretation that organizations using GMOs elsewhere would still not be certified (Criterion 6.8). They have also published external guidance interpreting their policy on GMOs (FSC-POL-30-602 (2000) EN), which does not hold status of an official position (p. 3).

2012 FSC P&C and 2010 PEFC Indicators Regarding Inventory, Monitoring & Evaluation

	Protocols	What is monitored	Continuous	Public Access
			Improvement?	
FSC	Not specified	Regeneration, structure, unanticipated loss, NTFP yield, disturbances, water, habitat, soil, fire, pests, sensitive species, invasives, road system, employment, local jobs, stakeholder responses, differences between expectations,	Yes	Summary of monitoring, excluding confidential info (8.4)
PEFC	Not specified	- Social, environmental and economic impacts (1.2) - Forest resources (1.3) - Health: pests, diseases, overgrazing, overstocking, fire, damage from climatic factors, etc. (2.2) - Exploitation of NTFPs, e.g. hunting and fishing (3.7) - HCV areas (4.2)	Yes. Feedback into planning process (1.7)	Management plan publicly available (1.6) but results of monitoring not specified.

Neither FSC or PEFC is prescriptive regarding the form that the monitoring and evaluation will take. FSC requires results of monitoring to be publicly available while PEFC does not.

2012 FSC P&C and 2010 PEFC Indicators Regarding Community Benefit

	Benefits	Community Needs	Employment
FSC	Enable production of benefits	Defines sites crucial to fulfilling	Provide reasonable opportunities
	to strengthen and diversify	community needs as a type of high-	for employment for local
	local economy (5.1)	conservation value area (9.1)	communities (4.3)
PEFC	Promote long-term health	Protects sites of significance that help to	"consider new opportunities for
	and well-being of	meet basic needs of local communities	employment" (6.1)
	communities (6.2)	(6.6)	

FSC and PEFC both have modest language regarding local employment – under FSC, it should be provided where "reasonable," and for PEFC it should be a factor to "consider" when making planning decisions. They both provide protection for sites that are crucial or significant for fulfilling community needs in terms of health, subsistence, and cultural importance.

2012 FSC P&C and 2010 PEFC Indicators Regarding Indigenous Rights

	Laws	Tenure	Consultation	Traditional Knowledge
FSC	FPIC (3.2) UNDRIP (3.4)	Recognizes and upholds legal and customary rights (3.2)	Engage with indigenous peoples re:  - Delegating control over management activities (3.2)  - Identifying significant areas (4.7)  - Use of knowledge (4.8)  7.6 Proactively and transparently engage affected stakeholders in planning and monitoring; engage interested stakeholders on request.	Compensate indigenous peoples for their knowledge (4.8)
PEFC	FPIC (6.4) UNDRIP (6.4)	"Legal, customary and traditional rights related to the forest land shall be clarified, recognized and respected."  (6.3)	"Provide for effective communication and consultation with local people and other stakeholders" (6.7); provide meaningful opportunities for parties to be engaged in forest management decisions (6.4)	Use traditional management systems when economically feasible (4.9); Make best use of local forest-related experience and knowledge (6.9)

It is unclear whether there is a legal difference between the terms 'upheld' and 'respected' in terms of indigenous land rights. If upholding is stronger, FSC holds stronger provisions for indigenous land rights. FSC also goes further in defining the topics that should be discussed in consultation with indigenous peoples, while PEFC leaves it open-ended. Both ways have their strengths and weaknesses; FSC may leave certain topics out, while the lack of clarification for PEFC may result in 'meaningful engagement' that fails to cover key points of contention.