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Analysis of Corrective Actions Issued to Existing Plantation Certificates

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The Forest Stewardship Council (FSC) is an independent, not for profit, non-government organisation based in Bonn, Germany.

The mission of the Forest Stewardship Council is to support environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC develops, supports and promotes international, national and provincial standards in line with its mission; evaluates, accredits and monitors certification bodies which verify the use of FSC standards; provides training and information; and promotes the use of products that carry the FSC logo.

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1. Introduction

Plantation management is a major issue facing the world's forests. The contribution of plantations towards sustainable forest management remains controversial. An extensive list of issues concerning plantations has been raised by a diverse group of stakeholders. In recent years, stakeholders have also voiced concerns related to the standards met by FSC certified plantations. In response to these concerns, FSC has initiated an international review process to clarify the global standard for responsible plantation management.

This document is produced in support of the review. It summarises the results of a study of "corrective actions" issued to 114 FSC certified plantations over the last 10 years. In all, 1238 corrective actions were included in the study.

For further information about the FSC plantations review, visit www.fsc.org/plantations.

2. The Certification Process

The Forest Stewardship Council (FSC) is an international body which accredits certification organizations (or bodies) in order to guarantee the authenticity of their claims for evaluating the extent to which forest management meet the FSC Principles and Criteria for Forest Stewardship. In all cases the process of certification is initiated voluntarily by forest owners and managers who request the services of a certification body (CB). The goal of FSC is to promote environmentally responsible, socially beneficial and economically viable management of the world's forests, by establishing a worldwide standard of recognized and respected Principles of Forest Stewardship.

The FSC's Principles and Criteria (P&C) apply to all tropical, temperate and boreal forests, as well as to plantations. The P&C are incorporated into the evaluation systems and standards of all certification organizations seeking accreditation by FSC. FSC and FSC-accredited certification organizations do not insist on perfection in satisfying the P&C. However, major failures in any of the individual Principles will normally disqualify a candidate from certification, or will lead to de-certification. Such decisions are taken by individual certifiers, and guided by the extent to which each Criterion is satisfied, and by the importance and consequences of failures. Some flexibility is allowed to cope with local circumstances and encourage the improvement of forest management practices.

A central component of the certification process is the issuance of Corrective Action Requests (CARs) to forest managers and owners. There are two types of CARs: pre-conditions (major corrective action requests) and conditions (minor corrective action requests) that respectively signify major and minor non-compliances with one or more aspects of the FSC P&C. A non-compliance is considered major where it results in, or is likely to result in a fundamental failure to achieve the objectives of the relevant FSC Criterion. A non-compliance is deemed minor if it is either unusual/ non-systematic, a temporary lapse, or its impacts are limited in their temporal and spatial scale. A non-compliance can only be considered minor where prompt corrective action has been taken to ensure that it will not be repeated such that a fundamental failure to achieve the objective of the relevant FSC Criterion does not result.

Pre-conditions (i.e. major non-compliance resulting in major corrective action) must be corrected prior to the issue of a certificate. In contrast, conditions (i.e. minor non-compliance resulting in

minor corrective action) do not preclude certification, but are attached to a certificate such that the forest management enterprise must meet its conditions within a defined period of time, followed up on by surveillance visits by the CB, in order to maintain certification.

This paper examines the Corrective Actions Requests issued to existing plantation certificates. CARs examined are drawn from public summaries of the main assessment reports produced by certification bodies. The purpose of this analysis is to examine the elements of the FSC P&C that generate the greatest number of CARs relative to plantations. Therefore this analysis will indicate areas where plantation management faces some of its most difficult problems as well as aspects of the FSC P&C that may require detailed guidance or greater clarity. The corollary is that this will reveal aspects of plantation management where FSC certification is generating improvements in management on the ground.

Pre-conditions and conditions are considered together for the purpose of generating an overall picture of those areas where the FSC certification process is generating improvements in plantation management. Additional rationale for this approach relates to circumstances where a pre-condition is closed (i.e. a certificate is issued), but a CB issues a condition related to the initial issue(s) the pre-condition was intended to address. In such cases, the pre-condition and its associated condition are grouped together as a single CAR because both cover the same aspect of the FSC P&C.

CARs are organised around each of the ten FSC Principles. Although aligning each CAR with a relevant FSC criterion is desirable, such organisation is impractical due to the fact that a single CAR is often relevant to several FSC Criteria and in many cases more than one Principle. The result is that in some cases a single CAR is grouped in more than one Principle. Within each FSC Principle, corrective actions are grouped together in similar categories rather than according to each individual FSC criterion. In some cases the categories are consistent with FSC Criteria, in others they are not.

3. Corrective Actions issued to FSC Certified Plantations

An overview of all CARs issued to plantation certificates indicates certain FSC Principles pose the greatest difficulties for plantations seeking certification (Table 1). Principle 6 (environmental impact) stands out because it is responsible for 35% of all CARs issued to plantations. Four other FSC Principles are also significant, with each contributing between 10-15% to the total. FSC Principles concerning community relations and worker's rights, management planning, monitoring and assessment, and the plantations-specific principle 10 collectively form a strong majority (81% including P6) of all CARs issued to plantations. Conversely, the other 5 Principles each generated 6% or less of the total.

Table 1: CARs issued to plantations certificates relative to FSC Principles

Principle #1: Compliance with laws and FSC Principles	6%
Principle #2: Tenure and use rights and responsibilities	2%
Principle #3: Indigenous peoples' rights	3%
Principle #4: Community relations and worker's rights	16%
Principle #5: Benefits from the forest	6%
Principle #6: Environmental impact	35%
Principle #7: Management plan	10%

Principle #8: Monitoring and assessment	11%
Principle #9: Maintenance of high conservation value forests	3%
Principle #10: Plantations	9%

3.1 Principle #1: Compliance with laws and FSC Principles

Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.

Corrective actions issued relative to forest owners and managers ability to comply with laws and FSC Principles (Table 2) contributed a small amount (6%) to the overall total. Forest owners and manager ability to communicate its national and international legal obligations, as well as FSC commitments to employees, contractors, and the general public generated the most CARs relative to Principle 1. CARs issued include requirements to maintain up-to-date lists of all relevant documents, as well as monitoring contractors and employees to ensure they are able to implement such commitments. Two other major areas where CARs were issued regard failures to adhere to one or more of the relevant legal requirements, and the absence of any clearly demonstrable commitment to the FSC P&C. Corrective actions were also required to improve the ability of forest managers to prevent unauthorised illegal activities from occurring within their management areas, and in a small number of miscellaneous areas such as the availability of information to auditors, and internal procedures for monitoring.

Table 2: CARs relative to Principle 1

Inadequate communication around national, international and FSC commitments	35%
Non-compliance with Laws	26%
Commitment to FSC P&C	20%
Prevention of illegal activities	9.5%
Other	9.5%

3.2 Principle #2: Tenure and use rights and responsibilities

Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.

Corrective actions regarding the definition, documentation, and legal establishment of long-term tenure and use rights generated 2% of all CARs. Such corrective actions have been issued regarding two primary areas (Table 3). Nearly half of all such CARs issued concern inadequate documentation regarding the tenure and use rights of either the forest management enterprise or of other affected stakeholders. Otherwise corrective actions were generated primarily in response to inadequate engagement with stakeholders. In such cases corrective actions required the development of procedures for consultation and dispute resolution.

Table 3: CARs relative to Principle 2

Documentation of tenure and use rights of company and others stakeholders	48 %
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Engagement with stakeholders	44%
Other	12%

3.3 Principle #3: Indigenous peoples' rights

The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.

The majority of CARs issues relative to recognition and respect for legal and customary rights of Indigenous peoples concern the ability of forest management enterprises' to consult with indigenous peoples (Table 4). CARs were also issued to develop procedures and provide training for staff to improve their ability to consult with indigenous peoples. Corrective actions also required forest owners and managers to improve their monitoring of such issues.

Table 4: CARs relative to Principle 3

Consultation	78%
Staff training and procedures	14%
Monitoring	6%
Other	2%

3.4 Principle #4: Community relations and worker's rights

Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.

The ability of plantation operations to maintain or enhance long-term social and economic well-being generated a significant number (16%) of all corrective actions issued. Two aspects of Principle 4 are prominent (Table 5). Corrective actions associated with the health and safety of workers generated nearly 40% of the total. These include requirements to provide training for workers and monitor the implementation of safety programs. Requirements for forest managers to better consult with communities and therefore better assess the social impacts of management actions generated one third of all CARs.

Although several other aspects contributed relatively minor amounts to the total, the large number of CARs issued relative to the Principle 4 highlights their significance. Corrective actions were issued to ensure forest owners and managers provided training programs for employees and community members that would enhance their skills. Forest managers were also required to improve the monitoring of management's impact on communities, and develop dispute resolution procedures. CARs also required forest managers and owners to better ensure the protection of workers' rights to organise and earn fair wages, as well as ensure contractors meet similar requirements in their treatment of employees.

Table 5: CARs relative to Principle 4

Health and safety	40%
Consultation with communities and assessing social impacts	33%
Training related to community benefits	10%
Monitoring	6%

Worker rights	4%
Dispute resolution	3%
Other	4%

3.5 Principle #5: Benefits from the forest

Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.

Corrective actions concerning the efficient use of the forest's multiple products and services made up 6% of the overall total. Approximately two-thirds of all corrective actions issued relative to Principle 5 required forest management to more effectively account for non-timber resources. In several cases this included monitoring and collecting more information not related to yield. Over 20% of CARs were issued to ensure and improve the accuracy of long-term sustained timber yield calculations. This aspect included the greater collection information and incorporating such information into management planning. CARs also required the implementation of measure to ensure the economic viability of the operation, and to encourage the promotion of other economic benefits within the community such as the collection of non-timber forest products.

Table 6: CARs relative to Principle 5

Demonstrate and ensure that management accounts for non-timber resources	66%
Long-term sustained yield calculations	22%
Ensuring economic viability	4%
Promotion of other economic benefits within the community	4%
Other	4%

3.6 Principle #6: Environmental impact

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.

Principle 6 generated the most CARS among all principles (35%). The most corrective actions were in this case issued to ensure biodiversity conservation measures were implemented. These included the designation of ecologically representative reserve networks, further protection for rare, threatened and endangered species, and the development of management plans for conservation areas. Corrective actions were also issued in large numbers to ensure that landscape level strategic planning and assessments were undertaken and implemented such that all environmental values were accounted for. Numerous corrective actions were also issued to ensure the environmental impacts of harvesting at the operational or site level were minimised and planned for accordingly.

The use of chemicals also generated a significant number of CARs. Approximately 16% of all CARs relative to Principle 6 were issued to ensure that certified plantations increase efforts to minimise the use of pesticides and work towards an integrated pest management strategy using non-chemical alternatives. A further 10% of CARs were issued relative to the security and safety of storage facilities, including handling and usage procedures. Corrective actions were also issued relative to the ability of management to control and monitor exotic and potentially invasive species, as well as the appropriateness of silvicultural and site preparation techniques such as the use of fire as a management tool and opportunities for moving away from clearcut harvest systems.

Table 7: CARs relative to Principle 6

Biodiversity conservation measures	26%
Landscape level strategic planning and assessment	20%
Site level operational requirements	19%
Chemical use and management	16%
Chemical storage and spillage preparedness	10%
Exotic and invasive species management	4%
Silviculture and site preparation	4%
Other	1%

3.7 Principle #7: Management plan

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.

Corrective actions issued regarding management plans form 10% of the total. The most prevalent area in this case concerns the inadequate incorporation of environmental values into management planning. Corrective actions included requirements for the development of, and incorporation of management plans for conservation areas as well as for rare, threatened and endangered species. Roughly 14% of the CARs issued required forest owners and managers to provide a publicly available summary of the management plan. A further 13% of all CARs required substantial improvement to management plans that were considered inadequate. This commonly consisted of requirements to better integrate, and in some cases incorporate, social, environmental and/ or economic aspects into a single coherent document.

Several corrective actions were also issued to ensure that employees received the necessary training to implement management plans. Three other areas each generated roughly 10% of the corrective actions issued relative to Principle 7. Forest managers were required to better monitor and implement management plans, ensure maps were produced or improved to help guide management planning, and carry out planning exercises to ensure that production was sustainable over the long term. Corrective actions were also issued to ensure that harvesting operations were adequately planned for and better incorporated into strategic plans.

Table 8: CARs relative to Principle 7

Environmental elements	21%
Public summary	14%

Training to ensure implementation	13%
Inadequate management plan	13%
Sustainability of production over the long term	10%
Monitoring and implementation	9%
Mapping improvements	9%
Harvesting operations	5%
Other	5%

3.8 Principle #8: Monitoring and assessment

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.

Corrective actions issued relative to monitoring and assessment make up approximately 11% of all CARs issued to plantations. Such CARs most commonly require forest managers to collect a greater quantity and quality of information on environmental aspects, such as wildlife and water resources, in both conservation and production areas. Corrective actions requiring forest managers to monitor and assess all resources in a comprehensive and coherent manner were prevalent. CARs were also issued in significant numbers that required improvements in the ability of the forest managers to trace forest products back to their source, a process termed the “chain of custody”. Corrective actions also required forest managers to make monitoring information publicly available. Requirements to collect information related to timber production, harvesting operations (including contractors), and the social impacts of management actions were also issued.

Table 9: CARs relative to Principle 8

Environmental Aspects	35%
Comprehensiveness	26%
Chain of custody	15%
Public availability of information	8%
Production	6%
Operations	6%
Social	2%
Other	2%

3.9 Principle #9: Maintenance of high conservation value forests

Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.

Few corrective actions were issued relative to high conservation value forests compared with other FSC Principles (3%). Nearly half of those issued required forest managers to better identify and assess high conservation value forests within their management areas. Failures to incorporate such areas into management planning also generated several CARs. Forest managers were also required to improve their monitoring of, and conduct more research examining the conservation values contained in such areas.

Table 10: CARs relative to Principle 9

Assessment and identification	48%
Management planning	26%
Monitoring and research	26%

3.10 Principle #10: Plantations

Plantations shall be planned and managed in accordance with Principles and Criteria 1 - 9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.

Corrective actions issued relative to the plantation-specific Principle 10 contributed 9% to all CARs issued to plantations. Such corrective actions most commonly required forest managers to improve and/or implement conservation and restoration activities at a strategic level. These include the development of management plans for conservation and restoration areas, including mapping these areas. Many corrective actions were also issued to correct deficiencies associated with harvesting operations at the strategic level. These include the development and implementation of guidelines on maximum clearcut size, landscape level projects to evaluate spatial patterns of harvest areas and the effects of road networks, as well as the collection of information on species diversity and age structure.

Corrective actions were also issued to minimise the impacts of harvesting operations and site level treatments. These include operational guidelines for operating around waterways and for minimising erosion. Forest health measures also figured prominently generating corrective actions requiring forest managers identify and manage the threats associated with pest and disease outbreaks, and the spread of exotic species into natural areas. CARs were also issued to ensure plantations were conducting research that examines opportunities for planting native species in production areas.

Table 11: CARs relative to Principle 10

Conservation and restoration	37%
Strategic operational issues	24%
Site level operational	17%
Forest health	11%
Native species trials	7%
Other	4%

4. Conclusions

Relative to the complete FSC P&C it is worth examining those aspects responsible for generating the greatest number of corrective actions. The ten most prevalent areas generating CARs collectively account for over half of all corrective action requests issued to plantations (Table 12). Corrective actions associated with Principle 6 (environmental impact) figure prominently. Five of the ten most prominent areas were generated relative to this Principle, and three others are relevant. The relevant aspects require forest managers to monitor environmental aspects, as well as improve and/or implement conservation and restoration

activities at a strategic level. Corrective actions also required forest managers to better demonstrate and ensure that management accounts for non-timber resources.

Corrective actions associated plantation operations' ability to maintain or enhance long-term social and economic well-being also generated a large number of CARs. Requirements to provide safe and healthy work environments were significant. Equally significant were requirements for forest managers to consult with communities and therefore improve their ability to assess the social impacts of management actions.

Table 12: Elements of the FSC P&C generating the greatest amount of CARs

Biodiversity conservation (P6)	9%
Landscape level strategic planning and assessment (P6)	7%
Health and Safety (P4)	7%
Site level operational requirements (P6)	7%
Chemical use and management (P6)	6%
Consultation with communities and assessing social impacts (P4)	6%
Demonstrate and ensure that management accounts for non-timber resources (P5)	4%
Chemical storage and spillage preparedness (P6)	4%
Monitoring environmental aspects (P8)	4%
Conservation and restoration (P10)	4%

More than indicate the aspects of plantation management where the FSC P&C are leading to improvements, this analysis also suggests that certain aspects of the P&C are particularly difficult for plantations to satisfy. Certain aspects are relatively straightforward, e.g. health and safety, however others reveal that what constitutes environmentally responsible plantation management remains unclear to many forest managers and owners. The conservation of biodiversity and planning for environmental values over large scales appear particularly difficult.