

SUGGESTIONS FOR THE FSC PLANTATIONS REVIEW

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Please accept the following as our initial input into the FSC's examination of plantation certification issues and ways to improve the efficacy of P&C 10.

The American Lands Alliance works with conservation organizations and citizens across the United States (US) to protect and recover our wildlife and wild places. We have been an FSC member since 1999. I have personally been involved with the FSC since about 1996, have served on the FSC US Board and the FSC US Pacific Coast Regional Standards Working Group, have participated in two General Assemblies, and have been active in promoting the FSC to key audiences.

We continue to support the FSC as the most rigorous and credible forest certification system, hope to see the FSC become even stronger in the coming years, and applaud the FSC's effort to resolve outstanding issues with plantation certification. We look forward to continuing to work with FSC IC and other FSC members to identify and advance proposals for improving the process and standards for plantation certification.

THE REVIEW PROCESS

To be successful in improving the FSC's approach to plantation certification, the plantation review needs to acknowledge and address the full range of issues with P&C 10 and plantation certification. It is my impression that the issues range from concerns with the implementation of P&C 10's existing requirements to fundamental questions over whether and how plantations should be certified, i.e., concerns with the basic structure and role of P&C 10. The process for resolving implementation issues may need to be different than the process for addressing P&C 10's deeper issues, though they could also overlap.



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The plantation review should probably also distinguish as much as possible amongst different situations. Worldwide, there is probably substantial variation in the styles of plantation management, concerns with plantations, plantations' role within landscapes, ecosystems, communities, and economies. Failure to recognize and address different situations will impede the resolution of the diverse concerns and objectives with plantations. We need more refined standards and procedures that explicitly address differences, rather than inadequate and overly generalized requirements designed to fit all situations.

THE DESIGN AND ROLE OF P&C 10—DECISION POINTS

The following questions are amongst those that need to be addressed by the plantations review. See the following section for our thoughts on these decision-points.

- How can the FSC most effectively prevent further conversion (i.e., degradation and destruction) of natural forests to ecologically-impooverished plantations?
 - How should the FSC close the loophole in P&C 10.9?
 - Should the FSC address the ongoing conversion of non-FSC certified natural forests more generally, and if so, how?
- Should the FSC certify plantations already established through the conversion of natural forests—including plantations established prior to 1994—and if so, how?
 - Should the FSC certify plantation-style forestry, or require existing plantations to be returned/restored to more natural conditions—including conditions that would also be productive for timber and other forest products?
 - To what extent should the FSC require the restoration of natural forest attributes in regions where intensive forest management has converted extensive forest tracts to plantations and pushed forest ecosystems to the brink of collapse?
 - If/where the FSC does not require the restoration of plantations to natural forest conditions, should the FSC require those plantations to demonstrably leverage the protection of natural forests elsewhere?
 - Should the term “plantation” and P&C 10 continue to potentially be applicable where intensive forest management has reduced natural forests to plantation conditions, yet where the plantations' dominant tree species are relatively native to the site?
- How should the FSC resolve the contradiction between P&C 10's requirement that plantations meet P&C 1-9, and the fact that plantations—by definition—probably can not fully meet P&C 1-9?
- Should the FSC certify plantations established on sites that normally are not forested?
 - Should the FSC protect non-forested ecosystems from conversion to plantations?
 - Should the FSC require plantations to demonstrably help protect natural forests?
- Should the FSC attempt to more explicitly address land allocation issues?

THE DESIGN AND ROLE OF P&C 10—CONCERNS AND RECOMMENDATIONS

The following issues and recommendations are enumerated for ease of reference. Recommendations 2A, 2B, 3A, and 5A are our highest priority. We are open to discussing all recommendations, and consider this document a starting point, not the last word. The following input reflects our perspective on the situation in North America and particularly the U.S. However, we have also tried to be sensitive to other regions' perspectives, to the extent we are familiar with them.

ISSUE 1: *Distinguishing plantations established through the conversion of natural forests from plantations established on non-forested sites.*

The FSC does not appear to distinguish between plantations established on non-forested sites, and plantations established through the conversion of natural forests. The former type of plantations might, in some cases, help relieve pressure on natural forests. The latter type carries an inherently high risk of harming natural forests in the area of conversion, and may or may not result in relieving pressure on other forests. Other differences also exist between these two classes of plantations.

RECOMMENDATION 1A: The FSC and P&C should distinguish between plantations established through forest conversion, and plantations established on non-forested sites.

ISSUE 2: *How can the FSC most effectively prevent further conversion (i.e., degradation and destruction) of natural forests to ecologically-impooverished plantations?*

In the U.S., conversion of natural forests to plantations remains a significant problem in non-certified forests, particularly in the Southeastern U.S. It is unlikely that this conversion is reducing pressure on other natural forests, and it is very unlikely that any reduction of pressure on other natural forests occurs to an extent that justifies the harm to the forest being converted. Generally, the FSC should continue to do everything in its power to limit the conversion of natural forests to plantations. As discussed below under Issue 3, some regions of the US already suffer from extensive plantation conversion, and should not be subjected to further conversions. Presumably, similar situations exist elsewhere.

SUBISSUE: *Protecting certified natural forests from conversion to plantations.*

RECOMMENDATION 2A: The FSC must continue to prohibit the conversion of natural forests to plantations and to non-forest land uses, at P&C 6.10.

SUBISSUE: *How should the FSC close the loophole in P&C 10.9?*

P&C 10.9 permits the certification of plantations established through the conversion of natural forests after 1994 if the current landowner was not responsible for the conversion. Timberland is frequently sold or traded, including after conversion and plantation establishment has occurred. Thus over time, P&C 10.9 will increasingly function as a loophole allowing significant amounts of post-1994 plantations to be certified, without those plantations being required to be restored to natural conditions. Indeed, plantations could be certified without even demonstrating that they relieve pressure on natural forests, that the conversion avoided harming HCVPs, or that continued plantation management will not prevent the survival and recovery of species and ecosystems.

RECOMMENDATION 2B: P&C 10.9 should be revised to require that plantations established after 1994 through the conversion of natural forests must be returned to (managed) natural forest conditions, for those plantations to be certified, regardless of whether the current landowner was responsible for the conversion. See Recommendation 3A for additional suggestions on how to require restoration of plantations within P&C 10.

SUBISSUE: *Should the FSC address the ongoing conversion of non-FSC certified natural forests more generally, and if so, how?*

P&C 10.9 does not allow plantations to be certified if they were established through conversion of natural forests after 1994, and if they were established by the same landowner. Certainly we do not want to endorse or encourage such conversion. However, such conversion continues to occur in lieu of FSC certification. Thus over time, there may be an increasing amount of plantation that will fall through the cracks in the FSC system.

RECOMMENDATION 2C: We may want to consider whether to revise P&C 10.9 to allow plantations established through conversion after 1994 to be certified, but only if those plantations are fully restored to (managed) natural conditions. We may want to continue precluding the certification of plantations established through the conversion of HCVPs and previously unlogged forests, i.e., wilderness.

ISSUE 3: *Should the FSC certify plantations already established through the conversion of natural forests—including plantations established prior to 1994—and if so, how?*

SUBISSUES: *Should the FSC certify plantation-style forestry, or require existing plantations to be returned/restored to more natural conditions—including conditions that would also be productive for timber and other forest products?*

To what extent should the FSC require the restoration of natural forest attributes in regions where intensive forest management has converted extensive forest tracts to plantations and pushed forest ecosystems to the brink of collapse?

If/where the FSC does not require the restoration of plantations to natural forest conditions, should the FSC require those plantations to demonstrably leverage the protection of natural forests elsewhere?

In the U.S., substantial percentages of the forests in the Pacific Northwest and some other regions were converted to relatively monocultural, short-rotation, chemically-intensive plantations before 1994. Such conversion has been a principle cause of the loss of native forest ecosystems, water quality degradation, sharp declines in timber inventories, and the endangerment of fish, wildlife, and plant species. Continued plantation style management of these forests perpetuates the degraded condition of these resources, and impedes efforts to recover ecosystems and biodiversity across the landscape. Plantation style management can also undercut more natural forest management in the marketplace, making it hard for certified forest landowners and others to adopt more sustainable forest practices.

While these plantations are characterized partly by a loss of tree species diversity, the dominant remaining tree species are often native to the local region. Thus many of these plantations may not fit some stereotypes about plantations. Nevertheless, they are functionally plantations, and can easily fit within the FSC's existing definition of plantation and P&C 10. Of course plantations established with non-native and/or off-site species are also a significant problem in the US.

Certification should be used to recognize and promote natural forest management practices. Certification should not be used to perpetuate ecologically destructive plantation practices on substantial portions of the landscape. However, by themselves, the P&C can allow existing plantations of both native and non-native species to be certified while still being managed as plantations—a problem that has not been adequately corrected by most of the FSC US' Regional Standards.

It should not be assumed that plantations are more productive than managed natural forests. In some parts of the world, exotic species may produce more timber volume per acre, per year, than managed natural forests. However, in the U.S., natural, long-rotation forestry can produce comparable or even greater amounts of wood volume per acre, per year, than the type of plantation forestry practiced here. The US timber industry is probably moving to shorter rotations because of their accounting practices and wood utilization strategies, not because of productivity issues.

RECOMMENDATION 3A: P&C 10.5 should be revised to require that except where it is proven that the plantation in question relieves pressure on natural forests, the plantation should be restored to (managed) natural forest conditions, i.e., full compliance with P&C 1-9 and their Regional Standards. The following specific requirements should be included in the revision.

It is preferable for 100% of the plantation area to be restored, though a minimum requirement of 50% may be acceptable, in the interest of keeping certification economically practicable, provided that the most ecologically important areas are among those restored. Certification should also be contingent upon: a) the existence of a management plan that will result in the conversion of the plantation area to (managed) natural forest conditions as quickly as possible, b) initiation of the revised management at or prior to the time of

certification, c) the existence of milestones for evaluating progress, and d) the existence of certification conditions that require attainment of the milestones.

Exceptions to the restoration requirement may be appropriate for plantations:

a) whose establishment and management are proven to reduce pressure on natural forests, per the following examples, b) that are located in areas that are a low priority for natural ecosystem conservation and restoration, and c) that will not contribute to substantial cumulative levels of existing and likely future conversion of natural forests to plantations within the region.

Examples of credible proof that plantations reduce pressure on natural forests include enforceable land allocation policies that expressly increase the acreage of protected forest reserves in the same region, in return for allowing some forest to be managed as plantation, with the size of the protected areas in question being no less than the size of the plantation areas. Other examples should demonstrate that the size and ecological value of natural forests in which pressure is relieved substantially exceeds the size and ecological value of the area in plantation, and that an institutional mechanism exists to ensure the trade-off is maintained over time.

By itself, increasing the supply of plantation-derived wood is not necessarily proof of reduced pressure on natural forests, given that the plantation wood may not be a market substitute for the timber logged in natural forests, given that plantations do not necessarily produce more timber volume per acre, per year, than natural forests, given likely continued increases in global demand for wood products, and given that establishment of the plantation may have simply shifted pressure from one natural forest location to another.

SUBISSUE: *Should the term “plantation” and P&C 10 continue to potentially be applicable where intensive forest management has reduced natural forests to plantation conditions, yet where the plantations’ dominant tree species are relatively native to the site?*

RECOMMENDATION 3B: Adopting a narrower definition of “plantation” that applies only a narrowly-targeted set of circumstances might also help alleviate some (though not all) problems with P&C 10. Forest areas that do not meet the definition of “plantation” would have to be certified as “natural forests” under FSC P&C 1-9. Presumably, degraded natural forests that are not certified as plantations would, quite appropriately, have to undergo improved management and restoration to be certified under P&C 1-9.

ISSUE 4: *How should the FSC resolve the contradiction between P&C 10’s requirement that plantations meet P&C 1-9, and the fact that plantations—by definition—probably can not fully meet P&C 1-9?*

There is an inherent contradiction between P&C 10’s requirement that plantations meet all elements of P&C 1-9, and the fact that by definition, plantations do not meet some elements of P&C 1-9, since they are not natural forests. This leads to confusion about the extent to which plantations must actually meet the requirements of P&C 1-9. Criteria that may inherently be incompatible with plantation management include: 5.4 (relating to

production of diverse forest products), 6.3 (relating to ecological diversity and ecosystem function), and 6.6 (specifically with regard to the avoidance of chemical use). This inconsistency has led to the adoption of some Regional Standards that directly contradict one another (e.g., Standards under P&C 6.3 that require in-stand retention within even-aged management units versus Standards under P&C 10 that allow even-aged management without variable retention).

Plantations are also unlikely to meet key conservation objectives with regard to imperiled species, representative samples of existing ecosystems, HCVPs, etc. However, these latter examples may not represent a violation of the P&C per se, since these ecological values are likely to have been eliminated in plantation areas prior to their certification, when the plantations were established. This latter situation speaks to the need to require improved management and restoration of natural forests that have been reduced to plantation conditions.

RECOMMENDATION 4A: The FSC should consider whether the P&C and/or an FSC guidance document should: a) explicitly identify limited situations where plantations will not be expected to fully meet a narrowly defined set of Criteria or Regional Standards, and b) state unequivocally that plantations must fully meet all other elements of P&C 1-9 and their Regional Standards.

ISSUE 5: *Should the FSC certify plantations established on sites that normally are not forested?*

SUBISSUE: *Should the FSC protect non-forested ecosystems from conversion to plantations?*

RECOMMENDATION 5A: The FSC should require, as part of P&C 10, an assessment of whether plantations established on non-forested sites were established at the expense of other natural ecosystems, e.g., native grasslands. Plantations established through the conversion (i.e., degradation and destruction) of natural, non-forest ecosystems should generally not be certified, except where justified by Regional Standards.

SUBISSUE: *Should the FSC require plantations on non-forest sites to demonstrably help protect natural forests?*

RECOMMENDATION 5B: Probably yes. See Recommendation 3A for language that should also be considered here.

ISSUE 6: *Should the FSC attempt to more explicitly address land allocation issues?*

RECOMMENDATION 6A: We may want to see P&C 10 or other elements of the P&C revised to more clearly require and guide the development of Regional Standards that address land allocation issues, i.e., the allocation of forests within the region to protected

forests, managed natural forests, and where desirable, plantations. However, we have not yet given this sufficient thought. For example, it will probably be important to limit the percentage of forest which can be allocated in any one region to plantation, perhaps to 15%. This process should also not serve to allow additional natural forest to be converted to plantation.

OTHER CONSIDERATIONS

Projections of substantial increases in global demand for wood products should not be used as a basis for deciding that plantations are “sustainable.” Sustainability must be measured, first and foremost, in terms of whether management practices are sustaining natural forest ecosystems, their biodiversity and other components, and their productivity. It is quite possible that current levels of demand, let alone projected increases, are not ecologically sustainable. Increased demand should be addressed through promotion of recycling, improved utilization efficiency, and demand-reduction. Increasing supply as a way to meet increased demand will only serve to facilitate further increases in demand.

With regard to questions that should be addressed by proposals to promote natural forest conservation through promotion of plantations, see our memo of October 17, 2001. We will provide this memo upon request. We are not yet endorsing such proposals. We do think such proposals raise interesting possibilities and pitfalls that are worth exploring, perhaps at the national level through public policy dialogues.