Proposal: Pilot Tests of Draft Standards

Draft Names: Requirements for Sourcing FSC Controlled Wood and FSC Accreditation Standard for Chain of Custody Evaluations
Codes of the documents: FSC-STD-40-005 V3-0 and FSC-STD-20-011 V2-0
Program: Controlled Wood

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Related documents: (1) The Development and Revision of FSC Normative Documents (FSC-PRO-01-001); and (2) FSC Policy for Pilot Tests of Draft FSC Standards (FSC-POL-01-001)

1. A description of the specific goals of the pilot tests;

The revised draft Controlled Wood Chain of Custody standard (FSC-STD-40-005 V3-0) is being implemented in practice for the purpose of pilot testing. The aim is to assess the workability of the standard, with a particular focus on requirements for the mitigation of risk by organizations wanting to source Controlled Wood from areas designated as ‘specified risk’ in a risk assessment.

2. An explanation as to why a pilot test is considered a better alternative than simple field testing prior to presentation of a standard to the FSC board for endorsement;

The overall goal of the pilot tests is to assess the possibility of implementation and auditability of the revised Controlled Wood standards; FSC-STD-40-005 V3-0 and its respective accreditation standard FSC-STD-20-011. The focus is on requirements for ‘Minimum Outcomes for Control Measures’ – the testing of which was directly requested by the FSC Board of Directors during their 67th meeting, in November 2014, when revised FSC procedures for risk assessment were approved.

3. A description of the pilot test methodology, including specifically the involvement of FSC National Initiatives, accredited certification bodies and their clients or potential clients, and the basis on which temporary certificates might be issued as a result of the test;

Requirements for Minimum Outcomes for Control Measures exist for some types of risks (related to the rights of indigenous and traditional peoples, and to high conservation values, particularly intact forest landscapes) of sourcing unacceptable material that cannot be used as FSC Controlled Wood. They set minimum thresholds for risk mitigation by Control Measures,
which must be implemented by Organizations wishing to source Controlled Wood from areas that have been designated as ‘specified risk’ in a risk assessment.

The pilot test will focus on these requirements to test their workability and practical implications for sourcing Controlled Wood (see right side-bar). The originally-proposed requirements will be reviewed and if necessary revised, based on the outcomes and stakeholder feedback. Two Controlled Wood documents will then be amended based on the outcome; the tested standard FSC-STD-40-005 V3-0 and FSC-PRO-60-002a FSC National Risk Assessment Framework, which will contain the same requirements for Minimum Outcomes for Control Measures.

4. A specific statement as to the range of situations in which testing is desirable (e.g. boreal, tropical, temperate forest types; large/small forest areas; large/small manufacturers; north/south participation; etc.);

The pilot test will take place in two separate locations within Canada, and one in Russia. Due to the need to carry out the tests in big countries with appropriate conditions (presence of indigenous or traditional peoples, and intact forest landscapes), FSC and FSC Network Partners in Brazil, Canada and Russia searched for possibilities to conduct pilot tests in these three countries. The necessary stakeholders were all on board in Canada. Eventually, it was also possible to find stakeholders in Russia, however this was not possible in Brazil, where it was found that little Controlled Wood is sourced in areas of intact forest landscapes (the same is supposed to be the case for Russia). As the pilot test in Russia was planned quite late, it will not include additional workshops (see section 7).

Three certificate holders are involved in the pilot test:

- Mercer International will implement the draft revised standard for its Celgar pulp mill in Castlegar, Canada. This mill sources round logs and wood chips from a large number of suppliers in a complex supply chain. Its current Controlled Wood Risk Assessment covers areas of British Columbia, Canada, and parts of Washington, Idaho and Montana in the USA. Within this area there are several indigenous communities and areas of intact forest landscapes.

- Tembec will implement the draft revised standard for its pulp operations (two mills) in Temiscaming, Canada. It sources round logs and woodchips from a large area covered by its current Controlled Wood Risk Assessment – this is comprised by parts of the provinces of Ontario and Quebec, and includes intact forest landscapes and communities of indigenous peoples.
ICE TITAN will implement the draft revised standard as a trader without physical possession of material in Russia. It currently sources timber from the north-west of Russia using the FSC National Risk Assessment developed by FSC Russia and approved by FSC International, and implements a field verification program due to sourcing in unspecified risk areas. The pilot test will cover the Arkhangelsk region, which is the region where most of the company’s timber is sourced.

Should you be interested in testing in other countries, please approach the Coordinator.

5. A specific statement as to the potential implications, both positive and negative, of permitting the temporary FSC-labeling of products as a result of the pilot test;

The focus of the pilot test is the “workability” of minimum outcomes for control measures. The Oxford Dictionary defines ‘Workable’ as ‘capable of producing the desired effect or result; practicable; feasible’. Using this, “workability of Minimum Outcomes” refers to the possibility to implement the requirements with their original intent, as well as the practical implications for sourcing Controlled Wood within the tested area and the maintenance of the credibility of the revised Controlled Wood system.

6. A description of the specific safeguards implemented to ensure that the FSC trademarks are used properly and that the integrity of the FSC trademarks is maintained;

KPMG Forest Certification Services Inc. is the certification body for the Celgar mill of Mercer International and will conduct the evaluation/certification process for those operations. Rainforest Alliance is the certification body for Tembec and will conduct that certification process, and NEPCon is the certification body for ICE TITAN in Russia.

FSC International and FSC Canada will oversee the project.

A number of other stakeholders will be involved to provide input to the process and ensure a diversity of views are represented.

7. A copy of the draft standard that is to be tested, together with a specific statement of the key features of the draft standard and how they differ from existing FSC policies or standards.

A basic overview of the pilot testing process is as follows:

- Training webinar for all stakeholders (20 March 2015)
• Implementation of the standard by the certificate holder (by 30 April 2015).
• Stakeholder consultation on the certification process by the certification body (by 31 May 2015)
• Evaluation of the certificate holder’s implementation of the standard by the certification body (by July 2015)
• Preparation and submission of a report on the whole process by the certification body, including recommendations for consideration when finalizing the draft standards (July 2015).
• A (possible) workshop to discuss the outcomes to discuss and propose revisions (if necessary) to the MO requirements (mid August 2015).