

AF&PA WHITE PAPER: SUSTAINABLE FORESTRY AND CERTIFICATION PROGRAMS IN THE UNITED STATES

BACKGROUND:

Written for use by manufacturers of wood and paper-products, this paper provides an overview of the unique characteristics of United States (U.S.) forests and sustainable forestry practices, the reinforcing system of federal and state forest management laws, and the U.S. certification programs that further support sustainable forestry. Information within this document has been referenced to outside sources.

Information in this paper can be used to respond to groups that are “pressuring corporations... to purchase wood and paper products” that meet only a single certification system versus meeting one of several widely accepted and credible third-party certification systems.¹ It also is intended to serve as a general reference document to help explain the concepts of sustainable forestry and forest certification to employees, customers, the general public and other interested stakeholders.

It is important to understand the context of forest land ownership and fiber sourcing in the U.S. Unlike many other countries, the majority of wood fiber-based manufacturing operations in the U.S. are supplied by fiber from a base of numerous, extremely diverse private landowners. Sustainable forestry on these lands is ensured largely by the strong rule of law in place in the U.S., and this has been reinforced through the highly successful implementation of voluntary best management practices and engagement encouraging sustainable forest practices by companies sourcing fiber from small family forest landowners. Thus, direct certification of these lands is not necessarily essential to ensuring a sustainable fiber supply. Forest certification programs, in general, however, have played a very important role in promoting and establishing sustainable forestry, and this paper describes the requirements of the existing certification programs, including their similarity and variability.

SUSTAINABLE FORESTRY:

Sustainable forest management, as defined at the 1992 United Nations Conference on Environment and Development, requires a balance between meeting the forest resource needs of the present without compromising the ability of future generations to do the same. Sustainable forest management involves practicing a land stewardship ethic that integrates silviculture (reforesting, managing, growing, nurturing and harvesting of trees for useful products) with the conservation of soil, air and water quality, wildlife and fish habitats, recreation and aesthetics.

Sustainable forest management practices on U.S. forests ensure healthy and abundant forests for present and future generations, while providing renewable natural raw materials for the production of pulp and environmentally beneficial, recyclable paper and packaging products and energy-efficient building materials. Approximately 766 million acres in the U.S. are forestland - the same acreage that existed 100 years ago. This is due, in part, to reforestation efforts, improvements in agricultural practices and

environmentally and economically sustainable markets for forest products.² While deforestation is occurring in other countries, there is more standing wood on U.S. forestlands today than there was a half century ago.³

The majority of the forestland within the U.S., approximately 56 percent, is privately-owned by approximately 11 million individual landowners. These 11 million individual landowners provide approximately 92 percent of the fiber needed to support the forest products industry. The remainder of the forestland is owned by federal, state and municipal governments.

Private landowners have shown widespread adoption of sustainable forest management practices,ⁱ including forestry best management practices (BMPs), which are science-based guidelines for harvesting forests (focusing on water quality) that have been found to be very effective in most circumstances. BMPs have the flexibility to be regionally adaptive. The National Council for Air and Stream Improvement (NCASI) has been monitoring the implementation and effectiveness of forestry BMPs since the 1970s.⁴ In its January 2012 report, NCASI concluded that “there is strong evidence that forestry BMPs work..., and that the forest community is implementing BMPs and providing enhanced water quality protection.”⁵

The National Association of State Foresters, in a 2015 Best Management Practices report, found that the BMP implementation rates were an average of 91 percent nationwide.⁶

U.S. forest products manufacturers also take steps to promote sustainable forest practices. For example, as a condition of membership, AF&PA member companies that source wood fiber from forests must comply with sustainable procurement principles that require providing information to landowners about reforestation following harvest, best management practices, and identification and protection of important habitat elements for wildlife and biodiversity, including Forests with Exceptional Conservation Value.

OVERARCHING LEGAL STRUCTURE:

The strong framework of voluntary BMPs in the U.S. is reinforced by a thorough system of federal and state forest management laws that apply on public and private land. At the federal level, a number of laws govern management of federal and private forestland, including laws that protect threatened and endangered species; provide for certain BMPs and regulation of activities in forested wetlands; protect air quality and visibility; regulate chemical use in forest stands; and provide for safe harvest activities and equipment, and fair labor practices. Most of these laws contain significant penalties for violations, which are enforced by state or federal governments. Many also contain citizen suit provisions, allowing interested citizens to challenge their implementation and enforcement, and the U.S. Congress exercises oversight responsibilities.⁷

ⁱ AF&PA member company landowners all conform to credible sustainable forest management programs.

At the state level, state agencies work to promote sound forestry practices on public and private lands. For example, as of 2008, more than 1,000 government entities had responsibility for over 800 public programs focused on forest resources, providing for air and water quality, fish and wildlife, reclamation and restoration of forested areas, human health and safety, forest trails and roads, forested coastal zone management, professional licensing and certification, taxation and revenue collection, and regulation of solid and hazardous materials in forested areas.⁸

THIRD-PARTY FOREST CERTIFICATION PROGRAMS:

Forest certification programs provide a set of standards, or guidelines and structure, for sustainable forest management. “Forest certification requires rigorous documentation to prove that forestry practices are sustainable as defined by a widely accepted standard.”⁹ Individual certification standards may be designed to address forest land management, wood fiber sourcing operations, or chain of custody. Many forest products manufacturing companies are certified to more than one certification system. Dual/multiple certification can allow companies to account for variations in the systems and utilize fiber from all certified lands in their wood basket. For example, 27 AF&PA member companies are dual or multi-certified.

Below is a description of the types of certification, the four primary forest certification systems within the U.S. and their requirements, and a limited comparison of the U.S. certification programs:

A. Types of Certifications

- 1. Forest (land) Management** – certifies the management of forest land and ensures the management is based upon sustainable practices as defined by the forest certification system.

Approximately 10 percent of all forests worldwide are certified. The majority of certified forests are located in industrialized countries such as Canada, the U.S. and a number of European countries.¹⁰ About 500 million acres (two-thirds) of U.S. forestlands are classified as timberland.¹¹ Current certified acres by certification program show higher participation by private landowners in the U.S. in the Sustainable Forestry Initiative® (SFI®) and the American Tree Farm System (ATFS) certification programs. Twenty percent of U.S. timberlandⁱⁱ is certified, with approximately 5 percent certified to the ATFS, 7 percent to Forest Stewardship Council (FSC)-U.S., and 12 percent to the SFI. (Note: These percentages exceed 20 percent as some acreage is dual certified.) Currently, there are no federal certified lands where harvest activities generally occur (U.S. Forest Service Lands, BLM); some state and municipal lands are certified to FSC and/or SFI.¹² While there is a strong legacy of voluntary sustainable forestry practices in the U.S., the fragmented pattern of land ownership, with so many small landowners, has hindered overall certification of forest lands to one of the

ⁱⁱ Timberland is land capable of growing twenty cubic feet per acre of wood.

standard forestry certification schemes due to the added cost and associated work of certification.¹³

2. **Wood Fiber Sourcing** – standardsⁱⁱⁱ, which can apply to suppliers and/or manufacturers' wood procurement operations to ensure fiber is purchased from responsible sources, and in some cases, promote sustainable practices on non-certified lands. Procurement standards do not require fiber purchases to be limited to certified lands and sources as they are meant to address the non-certified portion of the land base and ensure responsible fiber procurement from these sources. They can, but do not always, include a certification of the procurement process.
3. **Chain of Custody** – standards, which apply to suppliers and/manufacturers, require the tracking of certified, recycled, and non-certified fiber as it moves through the supply chain and permits the application of certified content claims and labels to products. The standards also allow mixed products when fiber from certified and non-certified lands is combined during the manufacturing process. Third-party certified Chain of Custody participants must track the amount of fiber moving through these systems to prevent double counting.

B. Forest Certification Programs in the United States

Within the U.S., there are four primary forest certification systems.

1. The Programme for the Endorsement of Forest Certification ([PEFC](#))

PEFC is an independent non-profit global umbrella organization and the world's largest forest certification system. Founded in 1999, and headquartered in Geneva, Switzerland, PEFC promotes sustainably managed forests through independent third-party certification. It assesses and endorses national land management standards that align with its principles, with 40 endorsed national certification systems and more than 268 million hectares (or 662 million acres) of certified forests. Of the 662 million acres endorsed under PEFC globally, 60 percent comes from PEFC standards in North America. In the United States, both SFI's and ATFS's forest management standards are endorsed by PEFC and in Canada. PEFC has endorsed the Canadian Standards Association's (CSA) forest management standard as well as SFI's forest management standard. The national certification programs are assessed by a PEFC-approved assessor based on a 4-Part PEFC Minimum Requirements Checklist. The checklist covers everything from how the national certification program was developed to the stakeholders involved, forestry requirements, chain of custody requirements, and third-party certification and accreditation requirements.¹⁴

2. Sustainable Forestry Initiative ([SFI](#))

ⁱⁱⁱ AF&PA members have a goal of increasing the amount of fiber procured from certified forestlands or through certified sourcing systems in the U.S. In 2010, 24 percent of the fiber procured by AF&PA members was procured from third-party certified forestlands and more than 96 percent of fiber sourced from the forest by AF&PA members was sourced through certified sourcing programs.

The SFI program was launched in 1995. The SFI standard is a North American standard overseen by SFI Inc., an independent, non-profit organization with offices in Washington, D.C. and Ottawa, ON Canada, dedicated to promoting sustainable forest management. It encompasses forest land management, wood fiber sourcing and chain of custody. SFI is SFI Inc. is governed by a three-chamber board of directors representing environmental, social and economic sectors, equally.

The SFI Standards are revised every five years following an inclusive, public review process, which includes recommendations from multi-stakeholder committees and an external review panel. As an integral part of its program, SFI has established SFI Implementation Committees (SICs) that include private landowners, independent loggers, forestry professionals, local officials, academics, scientists and conservation organizations, which provide logger training and education and landowner outreach promoting responsible forestry and best management practices.¹⁵

SFI offers three types of certifications:

Forest land management – The SFI 2015-2019 Forest Management Standard promotes sustainable forestry practices based on 13 Principles, 15 Objectives, 37 Performance Measures and 101 Indicators. These requirements include measures to protect water quality, biodiversity, wildlife habitat, species at risk and Forests with Exceptional Conservation Value.

SFI is the world's largest single forest land management certification standard, with approximately 61 million certified acres in the U.S. and over 266 million certified acres in the U.S. and Canada.¹⁶ Twenty-five percent of SFI certified land is in the U.S.¹⁷ SFI generally is used by large landowners, rather than small or family-type landowners.

Fiber Sourcing – applies to wood procurement organizations and requires SFI program participants to show that the fiber “in their supply chain comes from legal and responsible sources, whether the forests are certified or not. To meet the certified fiber sourcing requirements, primary producers must be third-party audited and certified to the SFI 2015-2019 Fiber Sourcing Standard. The SFI 2015-2019 Fiber Sourcing Standard promotes responsible forestry practices based on 14 Principles, 13 Objectives, 21 Performance Measures and 55 Indicators. These fiber sourcing requirements include measures to broaden the practice of biodiversity, use forestry best management practices to protect water quality, provide outreach to landowners and utilize the services of forest management and harvesting professionals. This makes the Fiber sourcing standard unique when compared to other forest certification programs in that it sets mandatory practice requirements for the responsible procurement of all fiber sourced directly from the forest, whether the forest is certified or not. T”¹⁸ Relative to

wood fiber sourcing, SFI is the only standard in the U.S. that requires program participants to engage in public outreach and the promotion of reforestation.

Chain of custody – applies to facilities such as manufacturers, processors and traders along the supply chain, and outlines the requirements for a system to track the flow of certified, recycled, responsibly sourced, and non-certified material from the forest to final product.¹⁹

3. American Tree Farm System ([ATFS](#))

ATFS, established in 1941, is the oldest U.S. forest land management certification program with 82 thousand woodland owners and 22 million certified acres. Currently ATFS is operated under the American Forest Foundation who promotes stewardship and protects the values provided by our nation's forest heritage. ATFS does not include procurement or a chain of custody certification programs. Fiber harvested from ATFS lands can be recognized under the PEFC and SFI chain of custody certificates.

ATFS-certified family forests “meet eight standards of sustainability and are managed for multiple purposes: water, wildlife, wood and recreation.”²⁰ ATFS also operates State Tree Farm Committees that support small landowners in the sustainable management of their forests.

4. Forest Stewardship Council (FSC) ([International](#) and [U.S.](#))

Developed in 1992 and 1993, and headquartered in Bonn, Germany, FSC is a global forestry certification organization that sets out [international standards](#) with which national and regional FSC standards must conform. FSC-International has approximately 450 million acres certified world-wide. Eight percent (or just over 35 million acres) of FSC's 450 million acres are located within the domestic United States.²¹ FSC-U.S. formerly maintained nine standards for different regions of the U.S.; in July 2010, it incorporated the different regional standards as “variations” into a single FSC-U.S. standard.²²

In 2010, FSC also finalized a family forest ownership program that allows group certification, with the goal of providing small family forest owners access to FSC certification.²³ Currently, FSC has approximately 4.8 million acres certified to this group certification program.²⁴

FSC offers three types of certification:

Forest management certification – uses ten Principles and Criteria (P&Cs) to serve as a framework for development of national and sub-national standards. “The P&Cs are applicable worldwide and relevant to forest areas and different ecosystems, as well as cultural, political and legal systems. This means that they are not specific to any particular country or region.” The

P&Cs were developed in 1994; a full review was undertaken in 2009 and completed in January 2012.²⁵

FSC-International maintains over 40 different forest certification standards across the world.²⁶ FSC engages with different national-level stakeholders when developing standards from country to country; thus, the terms of certification may differ from one country to another given the differences in the underlying laws and standards. “For example, some U.S. and Canadian forests have clearcut size limits, whereas FSC’s standards for Brazil, Russia and New Zealand have no limits.”²⁷

Currently, many FSC-International forest management standards “are interim or not fully developed.”²⁸ Where there is not yet an FSC-accredited standard, certification bodies use “their own ‘generic’ interim standards, adapted to account for the local conditions in the country or region in which they are to be used with input from local stakeholders.” FSC-International recently proposed a set of International Generic Indicators to replace the generic interim standards.²⁹

Controlled wood certification – Under the FSC system, if wood fiber does not come from certified land and will be mixed with FSC fiber for labeling it must be “controlled” to ensure it is wood FSC considers acceptable. Controlled wood certification is designed to minimize risk surrounding issues such as legality, traditional and civil rights, conversion, high conservation values and genetically modified organisms when sourcing from non-FSC certified lands. Controlled wood material can be mixed with certified material during manufacture of products with an FSC-mixed label, enabling “manufacturers to manage low and fluctuating supplies of FSC certified forest products, while creating demand for FSC certified wood.”³⁰ There is no consumer label available for FSC Controlled Wood.

Chain of custody certification – applies to entities such as manufacturers, processors and traders of FSC certified forest products. It verifies FSC-certified material and products along the production chain.

C. Limited comparison of the U.S. Certification Programs

At their core, forest certification systems as a whole have much in common, sharing similar objectives and providing consumers with a choice in the marketplace. When different programs are available, comparisons inevitably are drawn. There is significant documentation in the public domain comparing different aspects of the available certification programs. Below is a sampling of this information:

1. Similarities

According to National Association of State Foresters (NASF), the ATFS, FSC-U.S. and the SFI systems all include “fundamental elements of credibility and make positive contributions to forest sustainability.”

The elements of credibility are: independent governance, multi-stakeholder standards, independent certification, credible complaints and appeals processes, open participation, and transparency.³¹ All three programs are recognized as sharing the common attribute of reforestation, “which is the cornerstone of sustainable forestry.”³²

FSC and SFI include requirements for third-party auditors, chain of custody, public reporting, stakeholder consultation and independent governance, and are based on compliance with local laws and regulations, forestry science, and best management practices.³³ The two systems are based on similar (but not the same) criteria and indicators, which include requirements for reforestation and conservation of biodiversity and old growth, protection of endangered species and water quality, and maintenance of sustainable harvest levels. Both systems allow plantations, clearcuts and conversions, with variation in requirements.³⁴ The FSC, PEFC, and SFI standards prohibit use of fiber from forests with genetically modified organisms or genetically engineered trees.^{iv}

Changes in the major certification programs in recent years mean “it is increasingly difficult to differentiate between certification systems in North America.”³⁵ The United Nations Economic Commission for Europe/Food and Agriculture Organization notes that: “[o]ver the years, many of the issues that previously divided the (certification) systems have become much less distinct. The largest certification systems generally have the same structural programmatic requirements.”³⁶

NASF stresses that: “[n]o certification program can credibly claim to be “best,” and no certification program that promotes itself as the only certification option can maintain credibility. Forest ecosystems are complex and a simplistic “one size fits all approach to certification cannot address all sustainability needs.”³⁷

2. Variations in FSC-U.S. and SFI Standards

Despite the overall similarity in structure and criteria, there are some variations in the certification systems. In comparing the systems, it should be noted that: 1) products carrying an FSC label may be sourced under one of the forty national, sub-national, or interim FSC global standards that sometimes have less vigorous benchmarks than the FSC-U.S. standard;^v and 2) the nine regions in the FSC-U.S. standard contain different requirements for practices such as set-asides and clearcut size.

^{iv} SFI and FSC-U.S. previously varied in requirements related to GMOs. In January 2014, the SFI board adopted a policy prohibiting the use of fiber from genetically engineered trees via tree biotechnology

^v For example, the FSC-Russia standard has no limits on clearcut size and specifies the width of streamside management zones as that which is within legal requirements. In contrast, the FSC-U.S. standard specifies streamside zones beyond the legal requirements in the Pacific coast – up to 150 feet in fish bearing streams.

Variations in the forest management standards include:

Clearcuts: Both standards allow responsible clearcutting. SFI has a single requirement in North America of a maximum average size of 120 acres. FSC-U.S. clearcut requirements vary by region and forest type. FSC sometimes refers to clearcuts as clearings. Both FSC and SFI standards require mast trees, snags, and nest trees to be left in clearcuts. In some US regions, FSC has specific requirements regarding the number of such trees. The FSC-U.S. standard has varying maximum size restrictions, ranging from two to 80 acres in some cases, although sometimes a maximum clearcut size is not specified in the standard. The Southeastern U.S. standard recommends a nonbinding 80-acre limit on clearings and clearcuts; however, auditors approve larger openings, and have approved 100-acre average openings close to SFI's 120-acre average.³⁸

Chemical Use: FSC-U.S. encourages minimization, but does not prohibit the use of all chemicals, requiring that “the forest owner/manager strive to reduce the use of chemical pesticides and biocides, and work towards their eventual phase-out whenever feasible.”³⁹ SFI allows forest chemical use that has been approved by federal, state and local governments. The SFI Standard has eight auditable requirements related to chemical use. SFI also has two new indicators that ban World Health Organization 1A and 1B pesticides, except where no other viable alternative is acceptable, and pesticides under the Stockholm Convention on Persistent Organic Pollutants.⁴⁰

Plantations: FSC prohibits replacement of natural forests with tree plantations, and places requirements on management of plantations. FSC places more restrictive requirements on plantations than natural stands and “semi-natural” forests. The classification of plantations has become more “relaxed,” and in certain regions, such as the southeastern U.S., some forest types have been reclassified as planted semi-natural stands.⁴¹ Under the SFI standard, conversions to plantations “are not allowed except in justified circumstances where the program participant can document that ecological impacts are not significant if managing for a different species mix after a final harvest.”⁴² SFI prohibits conversion to plantations in specified circumstances, including when the forest type is old growth or rare and ecologically significant at the landscape level and when reforestation cannot be accomplished promptly.

Independent Third-Party Certifications and Audits: FSC's auditors are accredited by Accreditation Services International (ASI), a for-profit organization founded by FSC and governed by a Board of Directors that provides “external oversight of ASI's operations to strengthen the competence, independence and impartiality of the organization.”⁴³ FSC certificates can be awarded with multiple “minor” non-conformities related to issues such as First Nations consent, chemical use, areas of special

ecological value and rates of harvest....”⁴⁴ SFI requires certification bodies to be accredited by independent accreditation bodies, such as the American National Standards Institute, the American National Accreditation Board, and the Standards Council of Canada, following audit procedures and certification as required by the International Accreditation Forum.⁴⁵ SFI allows some minor non-conformances, but will not certify major or multiple minor non-conformances.⁴⁶

For more detailed comparison charts see Differences between FSC and SFI Certification Standards for Forest Management,⁴⁷ Comparing Forest Certification Standards in the U.S.: Economic Analysis and Practical Considerations,⁴⁸ and SFI and FSC Certification in North America- A Summary Comparison.⁴⁹

CONCLUSION:

Sustainable forestry on U.S. forest lands is largely assured by the strong rule of law in place in the U.S. and highly successful implementation of voluntary BMPs. Thus, direct certification of these lands is not necessarily essential to ensuring a sustainable fiber supply.

Four main certification programs operate in the North America. These certification programs are all credible and have a number of similarities, but there are differences. An important and desirable element of these programs is that they are continuously reviewed and revised over time. It is critical to note the importance of participating in all public comment processes during any standard revision. Company and trade association participation in a public vetting process will help to avoid the potential of any emerging certification requirement impacting U.S. global competitiveness. If a competitive disadvantage were to emerge, it could disrupt the balance between social, environmental, and financial value to the unique small non-industrial private landowner base. Once certification requirements significantly reduce the overall financial value received by the landowners, they may transition the use of their land from sustainable forest operations to non-forest use, which directly contradicts the goal of sustainable forest management.

When purchasing forest-based products, consumer products goods companies should be aware of the variations in the standards and look beyond the certification label to the specific requirements of the certification and consider the overall sustainability of the forests where the fiber is sourced. There is no consensus preference for one certification program; all programs reviewed in this paper play a significant role in promoting and advancing sustainable and responsible forestry. As such, customers should feel confident that products sourced in accordance with any of these programs support sustainable and responsible forestry.

Endnotes

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