

BEGINNER'S GUIDE TO
THIRD-PARTY FOREST CERTIFICATION:
*SHINING A LIGHT ON THE
CANADIAN STANDARDS ASSOCIATION (CSA)*

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Background

Forest certification began about a decade ago. Since that time, a number of players have become involved in development of certification programs. The resulting variety of approaches and diversity of standards can be interesting, but also confusing and frustrating at times, especially for businesses interested in certifying forests and participating in certified wood markets. Since September 2004, the Dovetail Reports have explored the Forest Stewardship Council (FSC), Sustainable Forestry Initiative (SFI), American Tree Farm System (ATFS), and the Programme for the Endorsement of Forest Certification schemes (PEFC). This report explores the Canadian Standards Association's Sustainable Forest Management Standard (CAN/CSA-Z809) and offers information about its origins, performance standards, labeling program, and adoption.

An Introduction to the CSA

The Canadian Standards Association (CSA) is a non-profit, membership organization. The CSA was chartered in 1919 and serves diverse interests with its more than 2,000 different standards for various industries¹. The CSA first published Canada's National Sustainable Forest Management (SFM) Standard, CAN/CSA Z809 in 1996. The CSA's SFM Program consists of four components: the SFM Standard, a chain-of-custody program, product marking with the CSA SFM Mark, and the CSA International's Forest Products Group which is responsible for promoting the program².

The CSA Standard addresses three general areas of industry operation: sustainable forest management in adherence with the Canadian Council of Forest Ministers' criteria, public participation, and operational systems consistent with ISO 14001 Environmental Management System Standards¹. The CSA Standard has been widely adopted by the major industrial forestland managers (license holders) in Canada, including Abitibi-Consolidated Company of Canada and Weyerhaeuser Company Limited. The American Forest & Paper Association (AF&PA) has also accepted the CSA Standard as the "functional equivalent



CSA International is a leading provider of product testing and certification services.

<http://www.csa-international.org/about/>



The Forest Products Marking program of CSA International developed the CSA SFM Mark that demonstrates to customers a labeled product has originated from a forest certified to Canada's National Standard for Sustainable Forest Management (CAN/CSA Z809) with the origin verified through an independent chain of custody audit.

http://www.csa-international.org/product_areas/forest_products_marking/

¹ <http://www.sfms.com/csa.htm#about>

² http://www.pefc.org/internet/resources/5_1185_962_file.921.doc

of the Sustainable Forestry Initiative (SFI) Standard³. In 2004, the CSA applied to the Programme for Endorsement of Forest Certification schemes (PEFC) for mutual recognition. A decision on this application is anticipated in 2005. With these strategic alliances, the CSA may be positioning itself for significant growth and increased market visibility in the coming years.

The CSA Standard

The development of a CSA Sustainable Forest Management (SFM) standard was initiated in 1993 when government agencies and the forest industry in Canada made a request to the CSA to develop credible forest management standards for the country⁴. A unique issue that needed to be addressed was the fact that the vast majority of forestland in Canada is publicly owned, with only 6% in private ownership⁵. Although there are large forest product industries in Canada, the industries are granted licenses to operate on public lands in the public interest and do not own these lands outright. This situation necessitated that public interests be given significant attention in forest management standards development. Also, the structure of the relationship between government agencies and forest industries operating on public lands in Canada creates liability and accountability issues in terms of consultation with the general public and First Nations.

The CSA SFM Standard is the *CAN/CSA-Z809-02, Sustainable Forest Management: Requirements and Guidance*. The CSA SFM Technical Committee (TC) was established to write and coordinate the standard. This Committee consists of four Chambers: Academia/Professional/Practitioner; General Interest/Environmental Groups; Government/Regulatory Authority; and Business Interest⁴. The TC includes members representing the interests of forest product producers, woodlot owners, researchers, government organizations, environmental

SFM Technical Committee Participants

<http://www.sfms.com/pdfs/matrix.pdf>

Industry

Abitibi-Consolidated Inc.
Coalition for Sustainable Forestry Certification
Federation Des Producteurs De Bois Du Quebec
Quebec Lumber Manufacturers' Association
Canadian Forest Products Ltd.
Lowood Enterprises

Professional Academia & Practitioners

Forintek Canada Corp.
Abusow International Ltd.
Dalhousie University
University of Alberta
Pricewaterhouse Coopers
University of British Columbia

Environmental & General Interest

National Aboriginal Forestry Association (NAFA)
Wildlife Habitat Canada
Canadian Wildlife Federation
Weldwood SFM Public Consultation Group
IWA Canada
Alberta Wilderness Association
Ontario Federation of Anglers & Hunters
Consumers' Association of Canada

Government/Regulatory

Department of Natural Resources and Energy,
New Brunswick
Alberta Innovation & Science
B.C. Ministry of Forests
Ontario Ministry of Natural Resources, Forest
Management Branch
Natural Resources Canada, Canadian Forest Service
Ministere des Ressources Naturelles du Quebec

³ <http://www.sfms.com/pdfs/sfiapplication.pdf>

⁴ http://www.pefc.org/internet/resources/5_1185_962_file.921.doc

⁵ http://www.pfc.forestry.ca/canforest/canf/canf1_e.html

groups, consumers, labor, and First-Nations⁶. Many environmental and Aboriginal organizations in Canada, most notably the Sierra Club of Canada and the National Aboriginal Forestry Association (NAFA) have raised concerns with the adequacy of the CSA standard for addressing ecological considerations and Aboriginal and Treaty rights. Both organizations have withdrawn from the CSA SFM Technical Committee⁷. The CSA requires that the Technical Committee review a new Standard within five years of publication. In 2000, the Technical Committee initiated a review of the standard first published in 1996, and a revised standard was approved in 2002 and published on June 27, 2003⁸. This revised standard is the one currently applied. Organizations registered to the 1996 standard must be evaluated against the revised standard and reregistered within 3 years of the publication date (i.e., by June 27, 2006).⁹

The CSA Standard's SFM requirements are based on the international Helsinki and Montreal processes and the SFM criteria developed by the Canadian Council of Forest Ministers. The CSA closely follows ISO guidelines and claims to have "the only SFM Standard in North America to be developed according to an internationally recognized and accredited standards development process⁴."

The CSA Standard aims to emphasize the role of adaptive forest management in sustainable forest management and to link adaptive management with forest certification through three categories of requirements in the Standard: Performance Requirements, Public Participation Requirements, and Systems Requirements.

Performance Requirements (CSA Clause 5)

The Performance Requirements encompass the Sustainable Forest Management (SFM) measures and are based on the Canadian Council of Forest Ministers (CCFM) SFM criteria, elements and indicators. There are six Criteria, which are adopted verbatim from CCFM in the CSA Standard. There are also 21 Elements included in the standard though slightly modified. The Indicators developed by the CCFM are not listed in the CSA Standard but are available in the 2003 CCFM document¹⁰.

CCFM Criteria¹¹

1. Conservation of biological diversity;
2. Maintenance and enhancement of forest ecosystem condition and productivity;
3. Conservation of soil and water resources;
4. Forest ecosystem contributions to global ecological cycles;
5. Multiple benefits to society;
6. Accepting society's responsibility for sustainable development.

⁶ <http://www.sfms.com/csa.htm#about>

⁷ <http://www.nafaforestry.org/docs/backgroundunder.pdf>

⁸ http://www.csa-international.org/product_areas/forest_products_marking/program_documents/

⁹ http://www.scc.ca/en/news_events/news/newsdetails2_250.shtml

¹⁰ http://www.ccfm.org/2000pdf/CI_Booklet_e.pdf

¹¹ <http://www.for.gov.bc.ca/het/certification/csaz809overview.htm>

Certificate holders are required to use a public consultation process to develop a performance matrix that includes measurable objectives, indicators and targets for addressing the CCFM Criterion.

The CSA Standard does not include minimum acceptable management treatments in regard to the typical forest management issues included in other forest certification standards such as forestland conversion, plantation management, or endangered species. Under *CSA SFM Element 4.2 Forest Land Conversion*, forest managers are expected to “reduce” the amount of forest converted to non-forest uses “as much as possible” but no specific minimums or maximums are stated. Section 5.4 of the standard relates to the identification of issues in the public participation process and includes “timber harvest practices, pesticide use, species at risk, genetic engineering, and sites of special significance” as topics that interested parties may identify during the public consultation process. However, no guidance is given regarding what practices are allowed or required to address these issues if they are identified, and if they are not identified in the public consultation process they are not required to be addressed in the Sustainable Forest Management (SFM) plan.

The CSA Standard for a SFM plan is in Clause 7, which outlines the establishment of performance requirements for addressing the CSA SFM Elements for a Defined Forest Area (DFA). This Clause includes requirements that: one or more values are identified for each element, objectives are set for each value, one or more qualitative indicators are identified, and data on the current status of each indicator be provided with targets and acceptable levels of variance. This section suggests that SFM plans be made for a 20-25 year period.

Although it could be argued that, given the existing regulatory structure already in place in Canada, it is appropriate to avoid being too prescriptive in the forest management aspects of the Standard; however, the Standard is not adequately detailed to produce consistent or comparable management practices across certificate holders. *Instead, the Standard appears to be designed to result in uniformity of process rather than practice.*

Public Participation Requirements (CSA Clause 6)

A significant and noteworthy strength of the CSA Standard lies in the public participation requirements. The sections of the standard related to public participation provide abundant guidance, tools, and examples of approaches that organizations can employ. Independent of pursuing CSA certification, any organization interested in developing a public consultation program could benefit from reviewing this section of the CSA Standard. Organizations are asked to maintain a list of interested parties, including those that chose not to or were unable to participate. Organizations must document evidence of invitations and any reasons given for not participating. The standard even encourages an annual review of active participants and periodic invitation of new participants (5.2.f). The Standard includes details about what elements must be included in a Public Participation process such as defined roles and responsibilities, an agreed upon decision-making method, a conflict of interest policy, and a dispute-resolution mechanism (5.3).

Excerpt from CAN/CSA-Z809-02***5.3 Process******5.3.1 Basic Operating Rules***

The Organization shall demonstrate that

- a) the public participation process works according to clearly defined operating rules that contain provisions on*
 - . content;*
 - . goals;*
 - . timelines;*
 - . internal and external communication;*
 - . resources (including human, physical, financial, information, and technological, as necessary and reasonable);*
 - . roles, responsibilities, and obligations of participants and their organizations;*
 - . conflict of interest;*
 - . decision-making methods;*
 - . authority for decisions;*
 - . mechanisms to adjust the process as needed;*
 - . access to information (including this Standard);*
 - . the participation of experts, others interests, and government; and*
 - . a dispute-resolution mechanism; and*
- b) the participants have agreed to the public participation process operating rules.*

System Requirements (CSA Clause 7)

This final section of the CSA Standard requires a third-party independent audit conducted by an accredited certifier and uses the ISO 14001 Environmental Management System (EMS) Standard as the baseline.

Annex A of the CAN/CSA-Z809-02 Document describes the CSA certification process. Periodic surveillance audits (at least every 12 months) are required to verify operations and field performance to the SFM requirements and the Standard. The 2002 revised standard does not explicitly state a consistent re-certification timeline, although the 1996 version of the Standard indicates that full re-certification audits are required every three years¹. The 2002 Standard states that the Standards Council of Canada can provide information about audit frequency requirements. The CSA Standard follows ISO guidance for the audit report content.

The 2002 version of the CAN/CSA-Z809 is available at: <http://certifiedwood.csa.ca> Appendix B of the Standard provides a useful summary of the requirements.

CSA Forestland Certification

As of June 2004, 32.9 million acres of forest in Canada were CSA Certified¹². A survey of the Canadian Forest Products Industry conducted in 2002 showed that a significant number of companies intended to certify to one or more third-party standards. If all of the intentions are fulfilled, more than 170 million acres of forestland will be certified to the CSA Standard by the end of 2006¹³. Three organizations are accredited to perform CSA assessments, Quality Management Institute, PricewaterhouseCoopers LLP, and KPMG Performance Registrar Inc¹⁴.

CSA Chain of Custody

There are a relatively limited number of businesses that are participating in the CSA Chain of Custody program. According to the list of certified sites provided on the CSA International Website¹⁵, 42 CSA chain of custody certificates have been issued. Of these 42 certifications covering 76 sites¹⁷, several represent multiple certifications for one company. For example, Weyerhaeuser Company Limited is listed with 22 certificates. Overall, of the 42 certificates listed, there are 15 unique companies identified.

The tracking and labeling aspects of the CSA SFM Program were developed in July 2001. The CSA Chain of Custody requirements are included in the document entitled *CSA PLUS 1163: Chain of Custody for Forest Products Originating from a Defined Forest Area Registered to CAN/CSA-Z809*¹⁶. The CSA claims their chain of custody requirements are “the most rigorous and credible in the marketplace today”, due in part, to the inclusion of requirements for environmental management in their chain of custody program, based on “the belief that certified forest products should be produced by facilities that are environmentally responsible”¹⁷. Section 4.10 of the CSA Chain of Custody requirements includes the following Environmental Management requirement: “The organization shall establish

The CSA SFM Mark



Physical Separation: 100% of the product has been tracked and monitored from its point of origin (a Z809 certified forest) to the end consumer. This mark appears on the product and/or the packaging.



Minimum Average Percentage System for Composite Products: At least 70% of the input used to make this product line has been tracked and monitored from its point of origin (a Z809 certified forest) to the end consumer. This mark appears on packaging only.



Minimum Average Percentage System for Solid Wood; At least 70% of the content of this composite product has been tracked and monitored from its point of origin (a Z809 certified forest) to the end consumer. This mark appears on the product and/or the packaging.

<http://www.sfms.com/csa.htm#chain>

¹² <http://www.sfms.com/status.htm#csa>

¹³ <http://www.sfms.com/pdfs/CertificationIntentionsBulletin.pdf>

¹⁴ <http://www.forestrycertification.info>

¹⁵ http://www.csa-international.org/product_areas/forest_products_marking/certified_sites/

¹⁶ http://www.pefc.org/internet/resources/5_1185_980_file.934.pdf

¹⁷ http://www.pefc.org/internet/resources/5_1185_962_file.921.doc

and maintain policies, procedures, processes and management systems, or similar initiatives to provide assurance and demonstrate that it is operating and managing its site, facilities, structures, activities, processes, raw materials, by-products, finished products, and their associated environmental impacts in a proactive and responsible manner. This shall include the identification of, and commitment and compliance with, all relevant legal requirements related to the environment.¹⁶

The CSA SFM Product Mark

The CSA Forest Products Marking Program offers three label options based on the amount of certified material in the product and the inventory management system being used¹⁸. Currently, three sites are licensed to use the CSA SFM Mark: Canfor's Grande Prairie sawmill in Alberta, B.W. Creative Wood Industries LTS and Visscher Lumber in British Columbia¹⁷.

The CSA Forest Products Group

Besides the SFM Standard, the chain-of-custody program, and product marking with the CSA SFM Mark, the fourth component of the CSA SFM Program is the Forest Products Group. The role of this organization is to manage the marking program and to promote CSA both nationally and internationally with a focus on the program's rigor and its alignment with an internationally recognized standards development process. This Group represents the CSA SFM Program as Canada's Member Body on the PEFC Council.

There is some evidence of success in the program promotion effort. The CSA was recently endorsed in the United Kingdom's Government Procurement recommendations, and it appears likely that the CSA Standard will achieve PEFC endorsement more quickly and easily than the SFI standard.

The Relationship Between CSA and Other Forest Certification Systems

While CSA has applied for endorsement and mutual recognition from the PEFC, and the CSA standard has been recognized as the "functional equivalent" of the SFI standard,

CSA Welcomes UK Government Announcement to Ensure Government Sourcing of Legal and Sustainable Timber

Toronto – November 12, 2004 – The Canadian Standards Association (CSA), Canada's leading developer of standards and codes, welcomes UK Environment Minister Elliot Morley's November 9 call to strengthen the UK government's efforts to purchase legally harvested timber from managed forests.

The UK Ministry of Environment has conducted a thorough assessment of five forest certification schemes applicable to the UK and concluded that two schemes meet the Government's definition of Sustainable Forest Management (SFM) and legal harvesting. The report, commissioned for the Central Point of Expertise on Timber, concluded that CSA's sustainable forest management systems program meets both SFM and legal harvesting requirements. CAN/CSA - Z809 - 02, Sustainable Forest Management Requirements and Guidance (SFM) Canada's National Standard, is the only Sustainable Forest Management Standard in North America that requires both performance and management systems components, two key elements critical for assuring sustainable forest management.

http://www.csa-international.org/product_areas/forest_products_marking/forestry/Default.asp?articleID=8287&language=english

¹⁸ <http://www.sfms.com/csa.htm#chain>

there are significant differences between these programs. For example, CSA and PEFC fully conform to ISO guidelines, but in several areas such as accreditation, SFI does not. Also, PEFC and CSA permit only third-party certification while SFI allows first and second party claims. The sustainable forest management standards of both CSA and SFI are based on The Montreal Process, but their interpretations of these criteria and indicators differ. These differences do not make the systems incompatible, but they may help to explain why CSA has moved more quickly and been more successful in achieving international recognition, and the significant differences also highlight the oft-mistaken assumption that mutual recognition equates to standards being analogous in the assurances they provide.

Kathryn Fernholz has worked on family forest management issues and the challenge of increasing landowner access to certification for the past five years. Prior to Dovetail Partners, Kathryn developed and managed a group certification project for family forest owners in the Upper Midwest. Kathryn has also helped landowners in other regions of the United States and Canada increase their understanding of certification, improve their compliance with the standards, and realize the various benefits of participation. Kathryn has a B.S. degree in Forest Resources from the University of Minnesota and also studied at the College of Saint Benedict in St. Joseph, MN and Sheldon Jackson College in Sitka, Alaska.

This report was prepared by
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