

Sorting Through the Systems

A Greenpeace Briefing on Interfor's Forest Certifications

We would never buy paper from dead bears, otters, salmon and birds, from ruined native cultures, from destroyed species and destroyed lives, from ancient forests reduced to stumps and mud; but that's what we're buying when we buy paper made from old-growth clearcut trees – Margaret Atwood, Canadian Author and Booker Prize finalist.

Why are we considered the Second Coming of Darth Vader? – Interfor¹

Customers who do not wish to buy ancient forest destruction need to be selective in the certifications they will accept. Interfor, a Canadian forestry company notorious for its destructive logging in Canada's Great Bear Rainforest, is a case in point. (For more information on Interfor's forestry practices, see "Certified Destruction: A Greenpeace Briefing on Interfor's Operations in Canada's Great Bear Rainforest". www.greenpeace.org)

Interfor has recently obtained two certifications covering its coastal logging operations in old-growth temperate rainforests in British Columbia. The first certification uses "environmental management system" 14000 series standards sponsored by the International Organization for Standardization (ISO). The second uses "Sustainable Forestry Initiative" (SFI) standards written by the American Forest and Paper Association (AF&PA).

Interfor is using its ISO and AF&PA SFI certifications as evidence to make misleading "green" claims with the public and in the marketplace. Certification per se, however, is nothing more than a procedure whereby a third party gives written assurance that a product, process or service conforms to a specified standard. Use a weak or inappropriate standard and even the most destructive forest company can get certified. Certify against a comprehensive and effective standard for well-managed forests and these rogue companies will be weeded out.

So what do these ISO and SFI certifications really indicate? Who is behind them? How strong are their forest management, conservation and protection standards? Do they address significant social issues such as indigenous peoples' rights and land tenure? Do they offer opportunities for meaningful public input and participation?

ISO 14001 Environmental Management System Certification: What is it?

ISO certification reflects world-class environmental standards...[It] provides shareholders, customers and others with independent verification that we are meeting an internationally recognized standard for environmental management. – Interfor²

ISO 14001 does not establish performance requirements or specific criteria and indicators for defining sustainable forestry... Among the misleading practices that ISO wants to put an end to [is]... giving the false impression that... ISO 14000 is a label signifying a 'green' or 'environmentally friendly' product. This is not so. – ISO³

The International Organization for Standardization (ISO) is best known for its work on establishing shared technical standards for products such as screws and bolts, the size of credit cards, camera film speeds and the shape of shipping containers. The environment is a new area for the ISO. Development of the ISO 14000 "Environmental Management System" (EMS) standard was promoted by corporate interests in 1993. However, ISO procedures that were adequate for purely technical matters of setting the size of screws have proven totally insufficient for representing the much wider range of legitimate impacted stakeholder interests when dealing with environmental issues.⁴ ISO 14000 sets no environmental performance standard.

ISO 14001 is a standard to help companies design generic internal management procedures to assess environmental issues. Companies should:

- Define, write and make public an environmental policy
- Allocate staff and resources to implement a company program towards meeting the objectives outlined in the policy
- Establish internal procedures to monitor if they are making progress (or not) towards implementing their policy.

Weaknesses of the ISO 14001 standard include:

- Compliance with the environmental policy, or even compliance with the law, is not a requirement of certification – the company sets the environmental policy
- ISO 14001 neither sets nor endorses any environmental performance standards, in forestry or in any other industrial sector
- ISO 14001 certifications neither audit nor verify on-the-ground environmental performance
- Public consultation is not a requirement of the certification process, nor are public summaries of certification audits required
- ISO 14001 is not an environmental labeling system
- ISO has no effective controls to prevent misleading marketing claims related to ISO 14001 certifications.

Environmental management system (EMS) certification schemes are completely different from environmental labeling schemes. As the ISO points out, *“Two organizations carrying out similar activities but having different environmental performance may both comply with its [EMS] requirements.”*⁵

Environmental labeling, on the other hand, requires performance above a threshold. The environmental label is only awarded if a product or service has reached this level.⁶ The distinction between ISO 14001 and environmental labeling is essential.⁷

Because ISO 14001 has no forestry performance standards, any forestry company – from the most environmentally destructive to the most sustainable – can be certified. An ISO 14001 certification tells the consumer nothing about the relative environmental performance of any company's, including Interfor's, forestry operations.

AF&PA Sustainable Forestry Initiative (SFI) Certification: What is it?

*SFI program is an exacting standard to measure performance of sustainable forestry. – Interfor*⁸

*The bottom line for compliance with the SFI Principles and Objectives is unclear – but clearly very low. – American Lands*⁹

The American Forest and Paper Association (AF&PA) is the US forest industry trade and lobby organization. Its more than 200 members, which include some of the largest forestry industry companies in the world, control 90% of the industrial timberland, 84% of paper production and 50% of solid wood production in the United States.¹⁰

The Sustainable Forestry Initiative (SFI) program and its standards are set and controlled by the AF&PA; in other words by the forestry industry, for the forestry industry. All members of the AF&PA are, by definition, in compliance with the SFI Principles and Objectives, since compliance is a condition of AF&PA membership. Not surprisingly, the standard is written with very low performance thresholds, in order to be consistent with the wide range of existing and often destructive forestry practices of AF&PA's members. For this reason, SFI is often popularly referred to as the *Same-old Forestry Initiative*.

AF&PA members are free to choose between first party (self-reporting), second party or third party audits to report their compliance with the SFI standard. Once a company passes a third party audit it is considered SFI "certified". AF&PA promotes SFI certifications of Canadian logging companies through its non-member-licensing program.

The AF&PA developed the SFI program as means of improving its forestry industry members' bad public image. AF&PA research showed that the public gives the industry particularly low grades for its performance related to logging in wilderness areas, destruction of wildlife habitat, damage to water quality and streams, and industrial clearcutting.¹¹ The SFI standard is promoted by the AF&PA as addressing these issues and ending past abuses. Ironically, with Interfor now SFI certified, the AF&PA has endorsed a company that is a pariah in the international marketplace for its logging of wilderness areas, destruction of wildlife habitat, damage to streams and clearcutting of old-growth

AF&PA's SFI certification of Interfor's 2.9 million hectare coastal logging operations is no anomaly. Proclaimed by no less than AF&PA's CEO as "monumental"¹², Interfor's certification represents one quarter (25%) of the total AF&PA SFI certified forest area as of February 2001. Interfor's certification clearly demonstrates the weak performance requirements of the SFI standard.

The SFI standard creates an initial positive impression with its 11 "objectives", 35 "performance measures" and flowery language about "sustainable forestry". However, more careful reading shows that while its objectives are laudable, the "performance measures" are weak, and the 75 mandatory "core verification indicators" even weaker still. Compliance with the SFI standard is through "environmental management system" measures rather than on-the-ground performance indicators. (See ISO section above.) Of the required SFI core verification indicators:

- Twenty-nine (39%) can be met simply by providing evidence of a written policy, program, plan and/or planning procedure
- Fourteen (19%) require evidence of record-keeping systems
- Nine (12%) require evidence of participation and/or support for training or education activities
- Seven (9%) relate to reporting requirements to the AF&PA and/or evidence of support to SFI program State Implementation Committees
- Four (5%) require evidence of funding support for research
- Three (4%) require copies of relevant state laws to be on hand, and four (5%) more urge companies to follow applicable laws, rules, regulations and/or state mandated best management practices.

In short, more than 90% of the SFI standards core indicators are "systems" based.

The five remaining core indicators use performance-based requirements that are vague, open-ended and/or overly repetitive. For example, three of the remaining core indicators relate to soils, calling for practices that "maintain soil productivity", "avoid excessive soil disturbance", and "utilize erosion control measures" respectively. The two other remaining core verification indicators state that members shall "manage forests in a healthy and productive condition to minimize susceptibility to damaging agents", and ensure that "aesthetic considerations are incorporated in...management activities where visual impacts are a concern".

Analysis of the SFI standards published by the British Columbian government found:

*"a high degree of freedom in how the applicant decides to meet each objective and prescriptiveness is kept to a minimum...There is minimal requirements in regards to social and community standards, and there is no mention of consideration of indigenous peoples. Land tenure is not addressed...There is comparatively very little requirements for public consultation; the emphasis being on public education and outreach. Where consultation is mentioned, it is only in regards to how the Program Participant is meeting the SFI standard, not in regards to the standard itself."*¹³

Other shortcomings with the performance measures of the SFI standard that have been identified by the American Lands Alliance include¹⁴:

- **Weak forest protection standards.** SFI fails to require protection, much less restoration, of imperiled resources, including old-growth forests, threatened and endangered species and endangered ecosystems. SFI merely asks members to “identify and manage special sites” in a manner “appropriate to their unique features”. “Special sites” are never defined. In practice, SFI endorses clearcutting and highgrading of threatened and endangered old-growth forests.
- **Conversion of native forests.** SFI fails to prevent conversion of natural and semi-natural forests to monoculture tree plantations.
- **Clearcutting.** The SFI standard limits companies to an average clearcut size of 120 acres (50 hectares). Individual clearcuts can be much larger, and there are no limits on average clearcut size for “salvage” operations. SFI also allows entire watersheds to be clearcut within short time frames, as landowners need only wait 3 years to clearcut adjacent units.
- **Chemical pesticides.** SFI endorses regular use of toxic chemical pesticides in forest management, as long as it is “prudent”.
- **Genetically engineered trees.** SFI endorses the use of genetically engineered trees.

Not surprisingly, AF&PA’s SFI certification scheme has not only failed to gain the endorsement or support of major environmental organizations in the United States, including Greenpeace, World Wildlife Fund, Natural Resources Defense Council, The Sierra Club, The National Wildlife Federation, Friends of the Earth and American Lands, it is earning their outright opposition.

The Certified Forest Products Council (CFPC), a US-based group whose members include large retailers of forest products such as Home Depot, has developed ten criteria to assess if certification schemes provide credible, comprehensive and effective evaluations to justify consumer recognition as “Certified Well-Managed Forest”.¹⁵ According to the CFPC, *“Today, the only standards available in the marketplace that meet the criteria established by the Certified Forest Products Council are those of the Forest Stewardship Council.”*¹⁶

Nonetheless, the AF&PA is moving forward with a labeling scheme for its SFI certification program, scheduled for release in April 2001. The label will use a new logo identifying wood products produced by SFI “certified” companies. However, there are no plans for a chain-of-custody system to be put in place, and SFI labeled products, for what little they stand for, may also come from non-SFI certified forests. AF&PA is planning to spend US\$7 million per year over the next three years to advertise its certification and labeling system. It is a key part of a larger US\$85 million North American forestry industry public relations effort to persuade consumers that the destructive logging practices that have given the industry such a bad name are now a thing of the past.

Interfor: Setting the standard for ancient forest destruction

Rather than tackling the fundamental issues of forestry practice on the ground, Interfor seeks to solve its credibility problem through promoting its certification schemes that have very low or no forestry practices performance requirements. Interfor’s certifications serve only as window dressing to make its products appear more acceptable to the international marketplace. Failures include:

- **Failure to conserve ancient forests** of major environmental, social and cultural significance
- **Failure to respect the rights of indigenous Nations** to own, use and manage their lands, territories and resources
- **Failure to stop clearcutting** and other destructive logging practices that undermine biodiversity, ecological functions and forest integrity
- **Failure to safeguard local and regional economic interests** both through jobs directly related to logging and non-timber forest work and through stumpage fraud.¹⁷

Don't buy the hype

Interfor and the AF&PA are not alone in promoting as “green”, certifications that in fact endorse destruction of old-growth and other high-conservation value forests. The AF&PA are working to establish mutual recognition with the Pan European Forest Certification (PEFC) scheme. A recent national field assessment of PEFC endorsed certifications in Finland found over 50 cases where high conservation value old-growth forests were simply clearcut. (www.pefcwatch.org).

The Canadian Pulp and Paper Association (CPPA) is also stepping up its international public relations work. It is using certifications in misleading ways to create the perception that they say something “good” about Canadian forestry practices, when in fact they nothing at all. Seventeen Canadian forestry companies controlling 37 million hectares of forestlands are currently ISO 14001 certified. Contrary to the CPPA's misleading claims¹⁸, however, ISO 14001 certification clearly does NOT “ensure sustainable forestry” in Canada, or anywhere else.

What consumers can do?

- Do not buy Interfor
- Reject any ISO 14001 or AF&PA SFI certifications presented as evidence that a company is managing its forests well or “sustainably”
- Do not endorse, profile or promote the SFI system or labels in stores or with consumers
- Demand credible, performance based certification of forest management, endorsed by the Forest Stewardship Council
- Ask for FSC labeled products from your suppliers.

¹ Duncan Davies, Remarks to 58th Annual Truck Loggers Convention, 17 January 2001, Vancouver, BC

² Interfor Annual Report 1999

³ www.iso.ch

⁴ Pierre Hauselmann, 1997. “ISO Inside Out: ISO and environmental management.” WWF International Discussion Paper.

⁵ ISO 14,001 standard, introduction.

⁶ The Forest Stewardship Council (FSC) certification and labeling system is the only example of an international scheme with global coverage that is based on forest management, conservation and protection performance standards and supports a legitimate environmental label. www.fscoax.org

⁷ Hauselmann, op cit

⁸ Interfor, ‘New Relationships New Forestry’ 2000

⁹ www.americanlands.org/forestweb/SFI.htm

¹⁰ www.afandpa.org

¹¹ AF&PA, 1995. Sustainable Forestry Principles and Implementation Guidelines: Model Presentation. mimeo

¹² <http://www.afandpa.org/news/news.html>

¹³ Wood, P., 2000. A comparative analysis of selected international forestry certification schemes. Ministry of Employment and Investment, Province of British Columbia, BC.

¹⁴ <http://www.americanlands.org/forestweb/SFI.htm>

¹⁵ <http://www.certifiedwood.org/> “What is a Certified Well-Managed Forest?”

¹⁶ ibid

¹⁷ Certified Destruction: A Greenpeace briefing on Interfor's operations in Canada's Great Bear Rainforest. www.greenpeace.org

¹⁸ www.cppa.org/english/news/press00h.htm