



## **Forest Stewardship Council, Controlled Wood and the FSC Mix Label**

The Forest Stewardship Council (FSC) protects forest ecosystems by promoting environmentally appropriate, socially beneficial, and economically prosperous management of forests through our forest management and chain of custody standards. Forests that are certified to our forest management standards are able to make a formal claim about the materials that are harvested within them. However, not all forest owners are able or willing to go through the certification process.

In its early years, FSC only allowed products to be labeled with the FSC logo if all of the forest materials used to make them came from FSC certified forests. This meant that some forest product sectors were not able to participate in the FSC system, including pulp and paper, since the technical requirements for keeping certified and non-certified materials segregated were impractical. As a result, these large users of forest-based materials were outside the FSC system and unable to create demand for certified forests.

In 1997, FSC began to allow mixing of uncertified materials with FSC certified materials. This change led to the need for a more formal process for controlling what forms of uncertified materials could be included in FSC-labeled products. To maintain the credibility of the FSC label, FSC sought to avoid certain undesirable forest materials from being included in any FSC claim, including forest materials that were:

- Illegally harvested
- Harvested in violation of traditional and human rights
- Harvested in forests in which high conservation values are threatened by management activities (using FSC's definition of high conservation values)
- Harvested in forests that are being converted to plantations or to non-forest use
- From forests in which genetically modified trees are planted

In 2004, FSC introduced the concept of Controlled Wood – forest material that has been controlled for unacceptable sources and may be mixed (up to a certain level) with FSC-certified material in products that carry the FSC Mix label. Originally, to control forest materials, a company first completed a risk assessment for the area from which they sourced forest materials to determine if there was a risk of sourcing any of these ineligible materials. Then, if they wished to use forest materials from areas where the risk was something other than low, they had to verify that the forest materials sourced were not from these ineligible sources.

After the introduction of mixing and Controlled Wood, there was a marked increase in the number of companies producing FSC certified products, as well as an increase in the area of FSC certified forestland. It is clear that in the years following, new industry



sectors, such as pulp and paper, became involved in the FSC system in a significant way, and there was an increased demand for certified materials.

In 2015, FSC made changes to the requirements for companies that wanted to control materials prior to mixing with FSC certified materials. These changes were primarily intended to address concerns related to: 1) inconsistencies that had resulted from each company completing its own risk assessment; and 2) the perceived conflict of interest when a company itself completed the risk assessment for an area where they wished to source forest materials (and would prefer to not go through the verification process). The revised requirements mandate that companies use risk assessments developed by FSC or partners working on FSC's behalf. Additionally, these new FSC risk assessments must meet a higher standard than those previously required.

At the same time, FSC also introduced the concept of risk mitigation as an alternative to the previously required verification process that was used to confirm that ineligible materials were not sourced. This alternative provides companies with more flexibility in how they deal with forest materials from areas where the assessed risk of sourcing ineligible materials is something other than low. It means that instead of going through the verification process, companies may implement other kinds of actions to mitigate the risk of sourcing ineligible materials. This flexibility is important, as FSC believes it will encourage existing certificate holders to maintain their certification and new ones to join the FSC system (thereby growing demand for certified forest materials). With the increased flexibility, companies are also required to use more rigorous risk assessments, which are likely to identify more areas where the risk of sourcing unacceptable materials is something other than low.

## **U.S. Controlled Wood National Risk Assessments – Part 1 & Part 2**

FSC previously developed a Controlled Wood National Risk Assessment for the conterminous United States (i.e., all parts of the country except the states of Alaska, Hawaii and the U.S. territories) – that risk assessment, 'Part 1,' was approved in April 2019 and is now being used by all companies that wish to control uncertified forest materials from the assessed area, so that those materials may be mixed with FSC certified materials for use in certified products that carry the FSC Mix label.

FSC is now developing a 'Part 2' Controlled Wood National Risk Assessment for the states of Alaska and Hawaii. This Part 2 risk assessment is based in-part on the results of the risk assessment for the conterminous US, when the assessment was applicable to the entire United States. However, in many situations, additional information sources specifically related to Alaska and Hawaii were also consulted for the Part 2 assessments. The methodology used for development of the Part 2 risk assessment is also consistent with that of the risk assessment for the conterminous US. However, the



risk designations resulting from the assessment are not the same, nor is the proposed approach to risk mitigation.

We are now inviting interested and affected stakeholders to review the draft U.S. National Risk Assessment (Part 2) for Alaska and Hawaii, and provide us with your comments.

The public consultation period is open until Monday, December 23<sup>rd</sup>, 2019. While we welcome all comments, we would also like to receive your responses to a set of specific consultation questions, which can be accessed via our [FSC-US Controlled Wood National Risk Assessment for Alaska and Hawaii web page](#). Thank you for your interest and participation!

– FSC-US Policy & Standards Team