

# FSC® US FSS EXPLAINERS SERIES – CONVERSION EXPLAINED



## Conversion in the FSC Framework

FSC prohibits conversion of natural forests (including semi-natural forests) and high conservation values (HCVs) within FSC-certified management units and also (via the FSC Policy for Association; FSC-POL-01-004) prohibits conversion outside of certified areas but within lands that are the responsibility of the certificate holder. There are limited exceptions for “minimal conversion” that produces environmental and social benefits and situations that are outside of the control of the certificate holder.

### What is conversion?

Conversion in the FSC framework occurs whenever there is a lasting change in natural forest cover through human interference. This covers most land use changes: from converting a forest to a parking lot to the slow degradation of a forest over time that results in the inability of the natural forest conditions to recover without direct intervention. Conversion also applies to high conservation values (HCVs) in the same way it applies to natural forests, which is to say that any lasting negative changes in HCVs due to human interference are considered conversion. Other characterizations of conversion in the FSC framework may include significant loss of species diversity, habitat diversity, structural complexity, ecosystem functionality, or even livelihoods and cultural values. Restoration of native ecosystems that includes removal of trees or forested areas is not considered conversion by FSC.

The definition of conversion covers gradual forest degradation as well as rapid forest transformation. Importantly, land use changes are only considered conversion within the FSC framework when the change is induced by human activity. FSC has a Policy to Address Conversion (FSC-POL-01-007) that includes a comprehensive definition of what constitutes conversion. Elements of the Policy to Address Conversion are included in the revised Forest Stewardship Standard. This policy explicitly requires organizations to demonstrate that they are not converting natural forests and/or high conservation value areas to plantations or other land uses. FSC also prohibits the transformation of plantations to non-forest land uses, but this does not fall within the definition of “conversion.”

Importantly, the definition of “plantation” in the FSC framework is different than that of typical U.S. forestry use, and many U.S. planted and managed stands are considered “natural forest” under FSC definitions. See the adjacent Plantation Explainer document for more detailed information about what constitutes an FSC plantation.

### What about previously converted lands?

Conversion of FSC certified land, or even lands associated with FSC, is only allowed in very limited and specific circumstances. Similarly, certification of previously converted lands is only allowed under specific circumstances. FSC acknowledges much of the U.S. used to be natural forest and has undergone extensive land use changes over the years. For this reason, lands that were converted before December 1st, 1994 are eligible for certification and do not require implementation of any remedy. For lands that were converted between December 1, 1994 and December 31, 2020 a potential certificate holder must remediate environmental and social harms caused by that conversion (with differential expectations depending on whether or not they were responsible) following the FSC Remedy Framework before certification or association with FSC is possible. Lands that were converted after December 31, 2020 are generally not eligible for FSC certification.

### When is conversion allowed?

The limited and specific circumstances where minimal conversion of natural forest is allowed within FSC-certified management units:

- when the conversion affects a very limited portion of the management unit,
- when the conversion results in the production of long-term conservation and social benefits in the management unit, and
- when the conversion does not threaten HCVs or the sites and resources on which they rely

Importantly, all three of these criteria must be met for the conversion to be allowable, and the benefits provided by the conversion must be clear, substantial, additional and secure for the long-term.

### What does “a very limited portion” mean?

Generally, a very limited portion of the management unit is equal to 5% or less of the total area, or the maximum threshold of 2471 acres (all existing conversions combined), whichever is less.

### How do you define or determine “long-term conservation and social benefits” of conversion?

Ultimately, it will be up to your Certification Body as to what kinds of evidence they will accept as proof of long-term conservation and social benefits, but examples could include:

- situations where conversion of a forest will alleviate pressures on other more valuable ecosystems, thereby providing conservation benefits while also providing social benefits (e.g. collection of fuelwood where an essential need for local communities);
- conversion for infrastructure that will help to protect environmental values and will also provide social values (e.g., fire watch towers); and
- conversion for infrastructure that supports environmental education and/or sustainable tourism.

FSC has an Advice Note (ADVICE-20-007-016) explicitly stating that conversion to wind-turbines can be considered as acceptable forest conversion, so long as it meets the requirements outlined above regarding the size limit, proof of benefits, and no negative impact on HCVs. Though this specific advice note does not automatically allow all conversion to renewable energy land-use cases, it is a helpful starting point when developing evidence of conservation and social benefits of such conversions. With any conversion, an assessment of potential environmental and social impacts would need to take place.

### **For More Information:**

Criteria 6.9, 6.10 and 6.11 in the revised FSC US Forest Stewardship Standard address conversion issues for FSC-certified management units. The FSC Policy to Address Conversion (FSC-POL-01-007) includes additional details and guidance on conversion. FSC US is working to develop guidance on demonstrating environmental and social benefits in a U.S. context.