



Date: April 11, 2017

To: Karen Steer, Forest Stewardship Council US

RE: Public Consultation On the Third (Forest Tested) Draft of Forest Service Supplemental Requirements for FSC Certification

In July 2014, The Forest Stewards Guild published a policy statement in support of forest certification systems to verify whether forests are well managed. This statement was endorsed by the professional members of the Guild and remains the benchmark against which our membership evaluates certification systems.

The Guild certification policy statement can be read here:

http://www.forestguild.org/publications/policy/Policy_certification.pdf

In the statement, four broad criteria are provided, that continue to shape our community's view of forest management and the different certification systems in which we participate, professionally and/or personally. The fourth criterion, Certification of Public Forests, remains a nationally contentious issue with opportunities for certification innovation and success balanced against concerns of greenwashing, redundancy, and legal morasses. Much progress has been made in forest certification at the State level, but less at the Federal.

Beginning in 2015, the Forest Stewardship Council (FSC) has undertaken a multi-step process to develop a supplemental standard that would allow US Forest Service (USFS) National Forests to pursue certification, at the forest unit level, if they so choose. This effort is precisely in keeping with The Guild position of 2014: that certification systems must be periodically revised to incorporate new information, knowledge, and stakeholder concerns. In short, any certification system must evolve.

With focus on the needed evolution of certification standards, the Guild, and its professional members, support FSC's process of developing a supplemental standard for USFS National Forests. The complexity and scope of management, and the variety of demands placed on these forests warrant it, and we, professional members of the Guild, applaud FSC's willingness to consider and supplement its US Standard to apply and address these additional exigencies. We note a careful, thorough approach in devising additional standard requirements, and look forward to evaluating the final product given our previous support for forest certification systems.

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Well-managed National Forests are critical to our nation-from public health, recreation and wellbeing, to forest the products they grow, and on to the green infrastructure functions they provide. Forest certification allows third-party verification of management practices and provides additional assurances that, in this case, public forest resources are being managed for multiple benefits, including environmental, economic, and social attributes. Therefore, the Guild supports the FSC in developing and applying a USFS supplemental standard, as provided in this third draft, to allow certification of National Forests.

Thank you,

A handwritten signature in black ink, appearing to read "John S. Gunn". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

John, S. Gunn, Ph.D.
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