

# Membership Manual

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Forest Stewardship Council, U.S. Working Group SmartWood, a program of the Rainforest Alliance

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This Membership Manual encompasses the master list of documents required to implement the group certification scheme. Originally prepared in November 2010, this manual has since been updated:

January 5, 2011
November 3, 2011
January 10, 2012
November 7, 2012
November 5, 2013
October 20, 2014
November 14, 2014
December 15, 2015
October 20, 2016
November 10, 2017
November 10, 2017
November 10, 2018
March 20, 2020
May 12, 2021
May 20, 2022
September 21, 2023

NNRG will review and update this Membership Manual at least once annually and distribute updated manuals to Forest Stewardship Council (FSC) Group Certificate Members via email as part of updates pertaining to the annual FSC audit. Past manuals are maintained in digital format in NNRG's Seattle office.

Members will provide forest management records and updates to the Directory of Forestry and/or the Director of Programs. Information is maintained in NNRG's Salesforce<sup>TM</sup> database. NNRG uses this information to conduct an annual internal program review. To comply with the FSC public disclosure requirement, NNRG will release only aggregate level information. Any documents not available in digital format are stored in files in NNRG's Seattle and Olympia offices. All proprietary Member information is kept confidential. Proprietary information is available only for internal assessments and for verification purposes by the outside assessor, the Soil Association.

# 1. Background

**1.1 - Purpose of the Membership Manual -** The purpose of this manual is to guide you through the process of Forest Stewardship Council® (FSC®) certification as a Member of the NNRG Forestry Program. This manual explains FSC standards and policies as they relate to NNRG's Forestry Program Members in Washington and Oregon. This manual addresses most elements of the FSC Standard and Policies, but it is not a substitute for reading the source documents created by FSC. Members should refer to the underlying FSC documents when they identify issues of concern. This manual typically references the underlying documents by title and with internet links to a copy of the document. Northwest Natural Resource Group (NNRG) staff are available to provide further guidance when the underlying documents are not entirely clear.

The documents that state the rules for FSC certification can seem overwhelming at first. However, there are just a few primary documents with which all Members will need to be familiar. The other documents may be needed in special circumstances and can be referred to when the need arises.

NNRG Forestry Program Members will need to comply with all aspects of the FSC Standard and FSC Policies, Members will find that some requirements are not relevant to their individual situation. For example, if the member has never used pesticides and has no plans to use pesticides in the future, compliance with the FSC Policy on Pesticide Use requires only a statement in the forest management plan that the Member does not use chemical pesticides.

- **1.2 References -** The following are key FSC documents that this manual references:
  - **FSC Principles & Criteria**, FSC-STD-01-001 v4.0. This is the over-arching FSC Standard that applies to all FSC certified organizations in the U.S. and abroad.
  - **FSC U.S. Forest Management Standard, v1.0.** This is a more detailed, prescriptive document that was created by the regional working group. This is perhaps the most useful reference when planning your forestry activities. This includes the Family Forest indicators and guidance.
  - Standard for Group Entities in Forest Management Groups, FSC-STD-30-005 v1.0. This is the policy on the organization and administration of groups of separate landowners who attain certification as a group.
  - **SLIMF Eligibility Criteria**, FSC-STD-01-003 v1.0. This is the "Small, Low Intensity Managed Forests" criteria. The vast majority of NNRG Forestry Program Members qualify for these criteria.
  - **FSC Pesticides Policy**, FSC-POL-30-001 2005, and **Guidance**, including a list of hazardous chemicals in FSC-GUI-30-001 V2.0.

All of the documents described above are available at: <a href="https://us.fsc.org/en/certification/forest-management-certification">https://us.fsc.org/en/certification/forest-management-certification</a>

**1.3 - What is Forest Certification and why participate? -** For the past century, American society has increasingly recognized the importance of good forest management for the long-term social, economic and environmental outcomes it provides. We now recognize that stable communities, long-term profitability, and healthy, diverse ecosystems are only made possible through good planning and sound management that takes into account the full range of factors that are impacted by forest management.

Forest certification was started in the U.S. by the American Tree Farm System in 1941 as a method of encouraging planning, deliberate management, and recognition among small woodland owners.

Forest Stewardship Council (FSC) certification was created in 1993 as a system of connecting the forest products marketplace with good management practices around the world. The ultimate intent of the system is to both recognize and reward forest managers, including small woodland owners, with preferred market access, premium log pricing, and/or other incentives for managing to FSC standards.

FSC offers independent certification of forests, manufacturers and distributors to assure buyers that certified forests are well-managed and that products from these forests are harvested in an ecologically, economically, and socially responsible manner. FSC certification also provides a product label that is increasingly recognized and in demand in wood products markets and clearly identifies products as meeting rigorous standards.

**1.4 - What is the FSC? -** The FSC is an independent, non-profit organization that is controlled by its 1,000-plus organizational and individual Members worldwide. The organization operates on the conviction that meaningful standards are only possible through inclusive and transparent governance. Members include professional foresters, labor unions, forest product manufacturers, academics, timber companies, environmental groups, community development organizations, indigenous groups, and other forestry stakeholders. These Members are divided into a three chamber governance system: Economic, Social and Environmental. These chambers are 'weighted' to have equal power and reflect the three pillars of sustainability – economic productivity, social equity, and environmental conservation. Every three years, FSC Members meet to vote on system-wide issues at the General Assembly. This three chamber system also forms the basis for all national and regional decision making among FSC Members.

As an organization, FSC has three primary responsibilities:

- The creation and maintenance of standards and policies;
- The accreditation of third party certifiers;
- The development of the FSC brand and protection of the FSC trademark.

FSC forest management standards are based on a global set of 10 Principles and 56 associated Criteria. These Principles & Criteria are further refined into national or regional standards

developed by consensus-driven, multi-stakeholder working groups. FSC then accredits auditing companies to certify landowners to these standards, and has additional Chain of Custody (CoC) standards to certify manufacturers and distributors that process FSC materials.

FSC's international offices are located in Bonn, Germany (refer to <a href="www.fsc.org">www.fsc.org</a> for more information).

The head office for the FSC U.S. Initiative is in Minneapolis:

Forest Stewardship Council – U.S. (FSC-US)	Phone: 612.353.4511
708 First Street North, Suite 235	Email: <u>info@us.fsc.org</u>
Minneapolis, MN 55401	Web: <u>www.us.fsc.org</u>

**1.5 - What is Group Certification? -** Group certification is a voluntary process by which multiple independent landowners are certified under a single FSC certificate. The group of landowners is administered by an organization acting as group manager, in this case NNRG. The group manager acts as an intermediary between the certifier and landowners and assumes much of the responsibility for maintaining landowners' compliance with FSC standards. This differs from standard forest management certification in that the group manager typically has no legal title or use rights to the forest resources.

For a group structure to be certified, the group manager must meet all FSC policy and procedural requirements and their FSC compliance system must be applied to all individual forestlands in the group.

NNRG is more accurately referred to as the 'group entity' because landowner-Members share the responsibility for compliance with the FSC Standards and Policies. In a 'resource manager' group model, which would be managed by a consulting forester, the group entity would have responsibility for most forest management activities on Member properties.

Because a great deal of the responsibility and decision-making power rests with NNRG Forestry Program Members, it is very important to be familiar with the FSC requirements and NNRG Membership policies. This guide and other documents provided as templates will give you, the Member, the tools and guidance required to comply with the FSC certification program.

**1.6 - Why is Group Certification Important? -** The intent of group certification is to overcome the cost and administrative issues that limit small woodland owner access to FSC markets. Prior to the introduction of the group certification model, individual certification for small forest owners was cost prohibitive, particularly for acreages typical of smaller Northwest forests. Beyond direct costs, certification can also lead to additional indirect costs such as finding new markets for timber or creating new management systems.

Northwest Natural Resource Group's Forestry Program greatly reduces costs by aggregating landowners together, but also includes complementary services as a part of Membership. These include the development of new FSC markets, educational workshops, providing an information clearinghouse, referrals to financial incentive programs, and access to ecosystem services markets.

## 2. NNRG Policies

**2.1 - Membership Eligibility -** Membership in NNRG's Forestry Program is available to forest landowners in Oregon and Washington, with the intent of serving landowners that do not possess the resources to pursue certification directly. The program is not available to federal lands with the exception of the Departments of Defense and Energy.

Eligible landowners must demonstrate a long-term commitment to meeting and maintaining the FSC standards in their forest management, both through adherence to the NNRG service agreement, the content of their management plan, and their on-the-ground performance during field assessments. Eligible landowners must also demonstrate a willingness and ability to understand and comply with NNRG policies and procedures.

**2.2 - Membership Duration -** NNRG's FSC certificate has a duration of five years and is renewed following an intensive five-year audit by the Soil Association. Members in good standing will retain their chain of custody certificate as part of the renewal of the group certificate.

Membership is voluntary and landowners can enroll at any time during NNRG's five-year FSC certificate. Once enrolled, landowners are strongly encouraged to remain committed for at least five years. If a landowner wishes to end his or her Membership, the landowner must reapply to be readmitted.

If ownership of the enrolled property changes, the Membership does not automatically transfer to the new owner(s). If the new owner(s) are interested in retaining Membership, a new membership agreement can be established to keep the property certified, providing all other requirements are met.

Your membership will last for as long as you choose to stay current on membership dues and follow the FSC certification standards.

Members are encouraged to commit to at least 5 years.

**2.3 - Conditions & Corrective Action Requests (CARs) -** New members typically become "conditionally" certified, meaning that certain conditions must be fulfilled in the first months or year of membership. NNRG will issue written pre-conditions, conditions, or non-binding recommendations to an applicant following a site visit and review of the applicant's forest management plan. Conditions and CARs are issued along with guidance on how to make the correction. NNRG will follow up prior to the deadline to verify that a corrective action has taken

place. Verification involves either document review or a site visit, depending on the nature of the pre-condition and condition.

As a member of Northwest Natural Resource Group, an FSC-certified group, you agree to follow FSC policies. If the outcome of work or physical conditions on your property do not follow the FSC policies, the group may issue a "Corrective Action Request," a notice which explains what steps are needed to meet the policies.

The group may also make membership conditional on taking actions to conform to the policies for new member applicants. The FSC policies are described in detail in this manual, and in greater detail in the FSC U.S. Standard itself.

- **2.3.1 Pre-conditions -** If an aspect of management is grossly out of line with FSC standards such that Members are not compliant at the Criterion level, correction of the issue will be required as a pre-condition of FSC certification. Pre-conditions will be communicated to the prospective Member in writing. Certification is not possible without first satisfying preconditions.
- **2.3.2 Conditions** If an aspect of management is largely in compliance with FSC standards and satisfactory at the Criterion level, but needs improvement to achieve indicator level compliance, NNRG can provide conditional certification. Conditions will be communicated to the new Member in writing. Compliance with specific conditions will be required within a specified timeframe, most often prior to harvesting or one year, as deemed appropriate by NNRG in consultation with the landowner. Non-compliance with a condition will result in a second repeat condition with a firm time frame for compliance, typically 30 90 days. Non-compliance with a repeat condition is grounds for immediate expulsion from the certified group.
- **2.3.3 Recommendations -** In the interest of providing Members with constructive feedback, NNRG assessors may also provide formal recommendations for changes in management. These are completely non-binding.
- **2.4 Division of Duties -** FSC certification involves many different parties. The following section describes the key parties and the various responsibilities of NNRG, NNRG Members, monitors, service providers, the third-party assessor the Soil Association, and FSC. Each of these individuals and organizations must fulfill its obligations in order to achieve the objectives of ESC certification.

- NNRG is responsible for maintaining the certification standard and assuring that it is
  enforced. At all times, NNRG is directly and solely responsible for assuring that the
  certification standard is maintained on NNRG Member properties. NNRG will use a team
  of approved and qualified natural resource professionals for monitoring, but
  accountability cannot be delegated to another individual or organization. Forest service
  providers who have no conflict of interest (shall not both manage and assess the same
  property) will assess landowners to determine membership eligibility.
- NNRG Members are responsible for meeting the obligations specified in the Member Service Agreement (*Appendix 6: NNRG Member Service Agreement*). This includes reading and understanding this *Membership Manual* and FSC Standards and Policies. These obligations include:
  - Responding to NNRG's request for an Annual Renewal check-in call or report;
  - o Verifying qualifications of service providers (contractors); and
    - Note: Members are responsible for ensuring that all other service providers receive appropriate training on FSC and NNRG compliance.
  - o Complying with the Chain of Custody procedures.
- The Soil Association is the accredited certifier who is responsible for assessing NNRG's ability to assure compliance with certification standards throughout NNRG.
- All other contracted natural resource professionals are responsible for following the
  certification standard in their planning and operations and complying with NNRG
  policies on behalf of their landowner clients. Natural resource professionals, including
  foresters, loggers, tree planters, ecologists, and all other individuals, companies, or
  cooperatives providing forest management related services to Members are obligated
  to demonstrate an understanding and effective implementation of both the FSC U.S.
  National Standard and applicable NNRG policies.
- The Forest Stewardship Council is responsible for developing and updating the applicable regional standards for FSC certified forestry operations.
- **2.5 Dispute Resolution -** To avoid conflicts or disciplinary procedures arising during implementation or application of NNRG policies, Members are encouraged to communicate clearly and consistently with service providers, assessors, NNRG staff, and other relevant parties. If disputes arise that cannot be resolved by NNRG staff, a three Member Dispute Resolution Committee, comprised of one staff Member, one group Member, and one other party, will be asked to review the issue and propose a solution. If the Dispute Resolution Committee cannot facilitate a resolution, the two parties will contract with a third-party dispute resolution service. The two parties will share the cost of this service equally.
- **2.6 Withdrawal from NNRG -** Landowners will be removed from the certified group if they:

- Request to be removed from the group, giving at least 30-day notice;
- Do not adhere to their management plan and the FSC standards;
- Refuse to allow NNRG and/or the Soil Association access to their land for monitoring or auditing purposes;
- Sell their property (see last paragraph of this sub-section);
- Do not pay their annual Membership fee by the end of a 120-day grace period; or
- Fail to comply with a condition to their FSC certificate within the specified timeframe.

### Landowners that are exiting the group:

- Can no longer place any FSC or NNRG claim, logo, or their Chain of Custody number on any product, invoice, or marketing material, or make any FSC certified sales;
- Must remove all FSC logos and claims from material associated with the property including, but not limited to, websites, advertising, letterhead, brochures, and maps;
- Will no longer receive the benefits of NNRG Membership; and
- Must return their NNRG certificate and gate sign.

The continuation of use of logos by the landowner (former Member) on any paperwork, advertising or website constitutes a violation of the FSC trademark and may subject the landowner to legal action by FSC.

If a Member sells the property, membership will terminate 10 days after entering into a contract of sale or upon transfer of title by deed, whichever occurs earliest. The buyer or grantee of the property may become a Member and maintain the same property in the program if the seller and buyer/grantee notifies NNRG in writing and agrees to comply with all applicable policies. The new owner must also agree to comply with the previous owner's management plan, as well as to make all necessary updates to the plan. All FSC certification documentation must be updated with the new owner's information within 60 days of the property disposition.

**2.7 - Membership Fee Structure -** NNRG Members are responsible for an annual Membership fee which helps cover the administrative costs of certification, market development, and other NNRG activities. The Membership fee is payable to NNRG. NNRG reserves the right to raise fees if necessary. Starting in their second year, Members may be eligible for a reduced annual fee if they indicate during their Annual Renewal (*refer to Annual Renewal questions in Error!*\*Reference source not found., Section 1) that no significant management activity (e.g. harvest > 5 mbf has taken place), and they are up to date with compliance.

Member Level	Year 1	Reduced Annual	Standard Annual	
		Renewal	Renewal	
Family (1-100 acres)	\$350	\$75	\$250	
Small (101-200	\$450	\$150	\$350	
acres)				
Large (200 acres +)	Negotiated	Negotiated	Negotiated	

**2.8 - Notification of Membership Operations Updates -** NNRG will periodically update this Membership Manual and the Operations Manual as information changes or procedures are clarified. NNRG will review and update manuals at least once annually and distribute updated manuals to FSC Members via email as part of annual updates pertaining to the annual FSC audit. Backdated manuals are maintained on the hard drive at the NNRG main office.

# 3. Key Policies in the Context of FSC's 10 Principles

This chapter of the manual is structured to provide a section by section explanatory guide to the "FSC Principles & Criteria" document.

## 3.1 - Principle 1 - Compliance

The FSC Standard requires compliance with federal, state and local laws, as well as with the FSC Standard. This means that Members agree in writing to comply with the 10 Principles of the FSC and the detailed criteria included in the Standard and associated Policies, such as the policy on pesticide use.

**3.1.1 - Legal Requirements -** This principle requires Members, their employees and contractors to be knowledgeable of laws that pertain to property ownership, forestry and the environment. This often means a more than basic understanding of the law. The primary legal issues for NNRG Members are state forest practices, state environmental compliance, and federal and state taxes. Prior to beginning any active forest management, Members should consult with natural resources professionals about legal requirements, such as permits from state agencies and taxation of forestry revenues. If in doubt, Members must make reasonable inquiries about the law. NNRG can assist in many instances.

In this context, a legal violation could result in fines or other punishment, and could result in termination of Membership in the NNRG program. FSC certification requires Members to commit to long-term compliance with the FSC Standard. This commitment is stated in the service agreement and should be in your forest management plan as well.

## **Group Level Compliance**

**3.1.2 - Communications from NNRG to Members -** NNRG, as the group entity, is responsible for representing the Membership (*see Group Entities Standard FSC-STD-30-005*). NNRG's duties include representing the Membership at international FSC conventions, contributing to revising or developing new FSC Standard and Policies, working with the independent assessor, the Soil Association, during each annual audit, and by communicating with the Membership directly.

NNRG staff are always available during business hours to hear from Members. Please refer to <a href="https://www.nnrg.org">www.nnrg.org</a> for staff contact information. NNRG will make regular communications, usually by email, to the entire Membership with news about the group, case studies about particular Members (with the Member's prior approval), and general updates about FSC certification. When there are changes to the FSC Standard or Policies that require action by the group, NNRG will contact the entire group as soon as practicable. NNRG will explain the policy issue, the implications for Members, and guidance on complying with the policy. When modification of FSC policies affects only a few NNRG Members, NNRG will contact those Members directly. Members who do not use or have regular access to email should inform NNRG so that the

Member can receive postal mail or telephone communications. It is strongly recommended that Members have a regularly checked email address on file with NNRG staff.

- **3.1.3 CARs -** NNRG will clearly and promptly communicate information about the annual audit. The annual audit will often generate group-level Corrective Action Requests (CARs). NNRG will contact Members by email if the CAR necessitates action by Members. The communication will include a reference to the relevant FSC Principles and Criteria, guidance on what action is needed by Members, and timelines for action. To ensure full transparency, NNRG will notify Members upon completion of the audit and provide them with a link to the full report generated by the Soil Association.
- **3.1.4 Training -** NNRG conducts many sustainable forestry and forest product marketing training programs throughout the year in all parts of NNRG's service region. Members and the public at large may request to receive notice of these events. The trainings improve landowner knowledge and skills related to forest management and sustainable rural economies.
- **3.1.5 Application -** Prior to certification, applicants must complete the Membership application. The applicant or applicant's consulting forester must write a forest management plan (sometimes referred to as "FMP"), and complete all other applicable documentation requirements, such as environmental assessments. NNRG has several templates and examples available for use by applicants for drafting key documents. The next step in joining the certified group is a site visit by NNRG staff or an approved assessor who will evaluate landowner compliance with all aspects of the FSC standard. Prior to the site visit, NNRG or its assessor will review the management plan and other documents for sufficiency, accuracy and compliance. Refer to the NNRG Operations Manual for full details of the application process.
- **3.1.6 Member Reporting Requirements -** Member landowners must report information annually to NNRG in order to comply with the *Group Entity Standard, FSC-STD-30-005*. NNRG monitors forest management activity on each Member's property through data collection and site visits. Information about specific properties will be stored in NNRG's Salesforce<sup>TM</sup> database. NNRG uses this information to conduct an annual internal program review. To comply with the FSC public disclosure requirement, NNRG will release only aggregate level information. The Soil Association will review individual data, but this information remains confidential. Members must agree to release relevant information to NNRG and to allow the Soil Association to review it.

Members must report information to NNRG annually by completing the Annual Renewal interview and questions. The Annual Renewal questions are found in *Appendix 1: Annual Renewal Questions*. All of the reporting requirements are based on the *FSC U.S. Forest Management Standard (v. 1.0)* and other policies, as summarized in this manual.

NNRG also maintains copies of:

- Members' management plans,
- Membership Applications,
- Service Agreements,
- Poof of legal land tenure,
- Ecological monitoring records,
- Harvest yield information,
- Sales data,
- Post-harvest monitoring,
- Non-timber forest products,
- Chemical use records,
- Road and drainage maintenance,
- Road and drainage monitoring, and
- All other relevant documents.

These documents and data are also kept in electronic format using NNRG's enterprise software, Salesforce<sup>TM</sup>. Any documents not available in digital format are stored in files in NNRG's Seattle or Olympia offices. All proprietary Member information is kept confidential. Proprietary information is available only for internal assessments and for verification purposes by the outside assessor, the Soil Association.

NNRG retains Members' forest records for the duration of membership and retains data for the duration of membership in the group certificate and for at least 5 years after membership ends.

More information on monitoring is presented in 3.8 - Principle 8 - Monitoring below.

This manual summarizes the FSC Standard and its principles, focusing on its relevance to the group certification context. Members will gain a better understanding of the program by reading the summary.

Members are encouraged to read the full FSC Standard and associated policies.

## 3.2 - Principle 2 - Tenure

The second principle requires long-term land tenure and use rights. This must be shown by legal documents that record title, rights of access, and the right to cut and sell timber, for example. This principle is intimately linked to the first principle of legal compliance. The requirements of the tenure principle are relatively easy to comply with in the United States because title to land is publicly recorded and documents can be readily authenticated. Land

boundaries are recorded and can be readily verified by professional surveyors. In situations where title to land is questionable, landowners must cure the problem in the court system.

As part of the Membership Application, new Members must submit the county names and parcel numbers of all properties they wish to include. **If properties are added or subtracted, you must notify NNRG within 30 days.** It is critical that landowners cure any defects of title prior to Membership in NNRG. Any significant problems related to tenure and use rights can prevent or slow your admittance to the NNRG program.

Members must make sure that their property boundaries are clearly marked on the ground. You should check to see that property corners are staked and flagged. Boundaries should generally be marked by blazes on boundary trees at regular intervals. If you find that boundaries are not marked, a forester or surveyor (depending on state law) can easily mark boundaries. Good communication with neighbors is a good way to avoid problems. Taken together, these steps greatly reduce the risk of trespass and inadvertent timber theft during harvest operations.

The FSC U.S. Standard requires owners to permit community uses of property when these are legal and in existence at the time of certification. This may include hiking trail access, access across Member property by easement, or access onto the land for firewood, for example. If you are aware of access rights, describe who and where access occurs in the forest management plan. If there are no on-going, known rights to enter your land, then you should state this in the management plan.

Any disputes over tenure that arise after Membership in NNRG must be addressed by following a legal dispute resolution process. Common tenure problems include, for example, disputes among neighbors over road easements, or property line disputes under the law of adverse possession. If a dispute cannot be resolved between the parties on their own, the process of dispute resolution ordinarily starts with mediation, then may go to binding arbitration or to state or local court. NNRG expects Members to make reasonable efforts to quickly resolve tenure disputes. Members are required to promptly notify NNRG about tenure disputes when they arise.

## 3.3 - Principle 3 - Indigenous Rights

This principle is most important for managers of American Indian tribal lands. Managers of such lands will need to pay close attention to this principle. For all other Members, a brief assessment of possible indigenous peoples' rights may be sufficient.

Building upon Principle 2, this principle requires Members to determine if there are known or possible American Indian use rights on their property. There are numerous resources available to assist, such as local tribal governments, state archeologists and the Bureau of Indian Affairs.

Members must determine if there are current indigenous land use rights, as well as sites of archeological significance on their property. The possibility of either one, based on historical records or evidence on the ground, means more investigation is needed. Direct consultation with Tribes is not usually necessary, except for Members with large properties.

Managers of lands currently owned by American Indians have special obligations to landowners. Land managers and people in positions to make decisions about land management must consult with American Indian tribal authorities, such as tribal governments or allotment owners, to learn if there are sites that are used for ceremonial, hunting and food gathering, or social purposes that could be impacted by forest management. If sites are compatible with forest management, managers must develop plans to reduce the risk of damaging impacts. Some special sites may need to be placed off-limits to forestry activity and public access. It is often necessary to keep information of special sites confidential. FSC will never require confidential information to be made public. Finally, any use of indigenous land or indigenous knowledge by the landowner or manager will be properly compensated and such compensation will be made by formal agreement.

## 3.4 - Principle 4 - Community Relations, Workers' Rights, Social Impact

This principle concerns employment in the forest, economic effects on the local community, and relations between the forest owner and workers. Sustainable forestry is a means of creating sustainable rural economies, therefore FSC policies favor employment opportunities for people who live near the forest. If it is necessary to hire workers from outside the local area, it is important that these workers be granted the same rates of pay and benefits as local workers.

**3.4.1 - Hiring Contractors -** Some Members may do much of their forestry work themselves, many others hire contractors or employees. This depends on the owner, the size of the property and the management goals. Jobs in the woods range from highly skilled heavy equipment operation to basic manual labor. Workers should be paid according to their skill level and at or above local market rates.

Members are ultimately responsible for contractor performance. Service providers recommended by NNRG are pre-screened for professional qualifications, but Members are not required to hire based on NNRG recommendations. When hiring a contractor, the Member **must** obtain evidence of insurance and relevant training (Appendix 2: Service Provider Policies). The Membership list is a further resource for references and referrals.

The work of these contractors is where the theory of sustainable forestry is put in to practice. **FSC-certified forest management must meet or exceed applicable state and federal law.** It is critically important that contractors are competent and accountable. Contractors must be familiar with the FSC Standard as it pertains to their work, which is particularly important for

foresters and loggers who will carry out forest management activity. Members need to make sure that contractors are qualified and knowledgeable of the Standard and the quality of work required on FSC-certified properties. If contractors need guidance, NNRG will make their best attempt to assist them. Members should follow the recommended grievance procedures so that any problems that arise are handled in a systematic way.

In addition, it is important that Members and their contractors are knowledgeable of and comply with federal and state workplace safety laws. For questions on workplace safety and labor law, please consult the *Operations Manual, Section 4.4*.

**3.4.2 - Social Impact -** This principle addresses the fact that forestry impacts society as well as the environment. For this reason, owners must assess the social impact of their activities prior to certification. The assessment should ordinarily be incorporated into the forest management plan or can be a stand-alone document for larger properties. Owners of larger properties (over 2,500 acres) will need to consult with both those who could be directly affected by forest management, such as neighbors, and those who use nearby resources which could be impacted by timber harvesting, such as fishermen. The assessment should identify sites on the property that are important archeologically, culturally, or historically. The forest management plan must incorporate these findings and attempt to mitigate and reduce detrimental impacts.

## 3.5 - Principle 5 - Benefits of the Forest

This principle focuses on the economic value of the forest. Forests have the potential to generate economic benefits forever-as long as the land remains forested. There are trade-offs, of course, and forest management planning under FSC certification strives for long-term benefits over unsustainable, short-term gain.

**3.5.1 - Marketing and Diversification -** As part of an FSC-certified group, Members whose properties have completed the certification process can market their forest products as 'FSC Certified'. NNRG has many resources to assist in the effective marketing of certified material. This allows owners to capture a premium price, select market share or other preferred access for their sustainably managed forest products. NNRG promotes market connections between forest owners and local buyers of FSC logs.

Principle 5 recommends diversifying the forest products available for sale. Diverse forest stands promote product diversity-more species means more product types. Also, Members may identify non-timber forest products (NTFPs) that can be marketed. NTFPs are discussed in more detail below. See also the NNRG policy on NTFPs in the *Operations Manual*. Diverse land uses can also strengthen the economy. Recreational uses (hiking, hunting, and fishing) have direct and indirect economic benefits on the community. Members of NNRG are part of a large sustainable forestry network. Members are also encouraged to be active within the certified group and in other civic organizations such as the local chambers of commerce.

**3.5.2 - Rate of Harvest -** Above all, harvesting of forest products should have a long-term focus. This means that Members do not extract resources at an excessive rate or in a manner that damages other resources, such as soil or water. Timber harvesting should not exceed growth over any ten year period. Harvest operations must minimize waste and residual stand damage. Most of the timber cut during harvest operations should be removed from the site. Harvest operations must, however, leave adequate biomass on the ground to protect soil productivity without unduly creating fire risks.

Timber harvest must not exceed growth over any 10-year period. Growth estimates are based on stocking and site condition using site index models. Members will need to consult with a forester and document these estimates. Members who harvest timber at intervals greater than 10 years must compute the harvest based on the volume of growth since previous harvest and target stocking levels. Timber stands must reach target stocking as quickly as is practicable. Stocking depends on management objectives and species. Monitoring (3.8 - Principle 8 - Monitoring) and inventory of forest resources is discussed under Criteria 7.1 and 8 below.

## 3.6 - Principle 6 - Environmental Impact

**3.6.1 - Assessment -** Principle 6 sets out the rules concerning assessment of the environmental impact of forest management activity on FSC-certified lands. Environmental impact is a core concern, and is extremely important to the success of the entire FSC program. All Members should read all the criteria of Principle 6 closely because it sets forth detailed requirements that must be followed in planning and executing harvest operations. Contractors must be familiar with these details, as well. Small properties and owners who plan only lowintensity management activity can do less detailed assessments than owners of larger, more intensively managed forests.

The assessment process is closely linked to the High Conservation Value Forests (HCVF) requirement described in Principle 9 below.

The assessment process must be done before timber harvest or road building. The assessment requires skilled personnel to identify landscape-level ecological processes, such as disturbance regimes; common plants, wildlife and habitats; rare plant and wildlife communities; and water and soil resources. Typically, database research precedes field surveys. Managers, particularly of larger properties, must create maps of operationally useful scale that include the above-named attributes.

Management planning must incorporate assessment findings by designing timber harvest, road building or other activities to avoid or reduce environmental impact.

**3.6.2 - Silviculture -** Criteria under Indicator 6.3 provide detailed information on how to manage the forest to protect or maintain ecological functions. **Silvicultural systems that** 

promote natural regeneration and natural stand conditions are generally favored and timber harvest can be designed to simulate natural disturbance regimes. Forest management must also protect genetic diversity in the stand. This is possible through leaving seed trees, and by using local sources of seedlings for replanting. Retaining snags, downed wood, and individual old-growth trees provides important habitat for wildlife. Soil productivity will be protected by keeping the correct amount of biomass on site, and by monitoring site productivity. Fuels management will be carried out as appropriate to the site.

Members should refer to the detailed information contained in this portion of the U.S. Standard prior to planning harvesting operations.

- **3.6.3 Old-growth stands -** These are increasingly rare in the Pacific Northwest. The definition used by FSC takes into account stand size and past management activity. There are three types of old-growth stands:
  - Type I, stands of old-growth or late-succession structural and functional characteristics with no past harvest activity and few or no roads with an area of at least 20 acres;
  - Type II, same as type I, but with an area under 20 acres; and
  - Type III, stands with individual remnant old-growth trees.

Type I stands may not be harvested under FSC, except in certain circumstances on American Indian lands. The FSC Standard promotes not only the protection of existing stands, but also management activity to create future old-growth stands. Active management that created Type II and III stands may be continued. NNRG will determine the acreage of representative old-growth stands at the group level.

Outside of old-growth stands, Members will follow the tree retention guidelines of Criteria 6.3.e. Members must make sure that their consulting foresters are familiar with these guidelines *before* marking timber harvests. "Leave trees" will center around water bodies (riparian zones), snags, and special habitat areas.

Uneven-aged silviculture is generally preferred by FSC policy, but even-aged management may be used. If so, the guidelines of Criteria 6.3.f must be closely followed. The average size of harvest units must be less than 40 acres with no unit exceeding 60 acres, and there will be no harvest until saplings in adjacent units reach seven (7) feet in height. Even-aged silviculture may be used for restoration purposes and to promote the establishment of species that require direct sun. FSC and NNRG policy do not permit the conversion of natural forest to plantations unless it is very limited in extent, does not affect HCVF, and has an objective long-term benefit. See 3.10 - Principle 10 - Plantations.

FSC requires protecting representative samples of forest ecosystems. This refers to stand age and composition, and other natural features. NNRG will track this information at the group level. The size and extent of the group properties creates a wide range of possible forest

ecosystems that can be protected. Owners of larger properties may need to establish protected core areas within the property.

**3.6.4 - Roads and Harvest Operations -** Criterion 6.5 requires written plans to address the impact of mechanical operations on water resources. This section spells out operational requirements in great detail because the transportation system is perhaps the greatest source of water pollution from forest lands. Again, Members and contractors must read the standard closely. Members and contractors must carry out sufficient planning before timber harvest or road building and repair. Steep slopes may require the assistance of a geotechnical specialist.

The standard breaks streams into four categories depending on whether water flow is perennial or intermittent, whether the stream can or cannot support a fish population, and whether the water is used as a domestic water supply. A no-harvest buffer zone will protect every water body. The width of the buffer increases with the size and use, i.e., fish, domestic water supply, of the stream.

Members and their contractors will refer to state regulations and permitting requirements, as well as FSC standards prior to harvesting near water bodies, constructing water crossings or installing culverts.

**3.6.5 - Chemical Use -** NNRG strongly believes that good forest management does not need to rely on use of chemical pesticides when there are alternative practices available, such as integrated pest management strategies. Members need to regularly monitor their property for pest outbreaks. In some circumstances, exotic or invasive pests can only be effectively controlled with chemical pesticides. Permitted chemical compounds should only be used when clearly justified by the circumstances. The use of some synthetic chemical pesticides on Member properties is prohibited because of the detrimental impact on worker health, animal and plant health, and water and air quality.

Forest management plans must say whether pesticides will be used. If so, list the chemical, the quantity, and the targeted pest species, the risks involved, and include a map of areas where pesticides could be used.

All Members must monitor, retain written records and report to NNRG annually:

- a list of chemicals used
- quantities used (concentrate and diluted)
- application dates
- method of application
- the location and acreage treated, and
- effectiveness of pesticides

All pesticides, or toxicants, used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are:

- 1. not available;
- 2. prohibitively expensive, taking into account overall environmental and social costs, risks and benefits;
- 3. the only effective means for controlling invasive and exotic species; or
- 4. result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris).

If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.

FSC's revised <u>Pesticides Policy</u> takes a <u>risk-based approach</u> and encourages certified members to identify and address environmental and social risks prior to pesticide application. Members need to develop and implement written **strategies** that justify the use of any chemical pesticides based on the targeted species. Members should reference the environmental and social risk assessments (ESRAs) of particular chemicals to determine the potential risks and take steps to mitigate them.

FSC and NNRG have created the ESRAs below for the most commonly used pesticides, for members to consult when determining the risk factors of various pesticides. These and other ESRAs are available on the NNRG Certified member webpage at <a href="www.nnrg.org/resources/for-fsc-certified-members/">www.nnrg.org/resources/for-fsc-certified-members/</a>. Please contact the Director of Programs if you plan to use a pesticide that is not yet on the list so it can be prioritized and added.

- ESRA for Glyphosate
- ESRA for Imazapyr
- ESRA for Imidacloprid
- ESRA for Metsulfuron-methyl
- ESRA for Sulfometuron-methyl
- ESRA for Triclopyr
- ESRA for Aminopyralid
- ESRA for 2,4-D
- ESRA for Clopyralid
- Assessing Risk for Infrequently Used Chemicals

Whenever chemicals are used on any member properties, Members need to prepare a written **prescription** that states the chemical, the quantity, and the targeted species. Prescriptions will also describe the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. These prescriptions should be included in the forest management plan. The level of detail of the prescription and application procedures will depend on the U.S. EPA rating

of the chemical. Common general use pesticides require only brief and less technical procedures, while restricted use pesticides require more detailed, technical procedures.

Restricted Use pesticides, as defined by the U.S. EPA, may only be purchased and applied by licensed applicators with current safety and training certificates. With respect to EPA rated General Use pesticides, an applicator will have at least informal training and application procedures must be consistent with pesticide label requirements. All pesticide use, regardless of its EPA rating, must be consistent with product label directions and written management plan prescriptions. Members are responsible for informing workers of the risk of pesticide exposure and how to limit exposure. Management plans need to include, whenever possible, a strategy to phase-out chemical use.

If chemicals are used, Members need to **monitor** the effects. Members need to keep written records of:

- pest occurrences,
- control measures, and
- incidences of worker exposure to chemicals.

Members also need to keep a written log or list, and report to NNRG during the Annual Renewal:

- chemicals used.
- application dates,
- quantities,
- method of application,
- the location and area treated, and
- effectiveness of application.

The level of detail depends on the toxicity of the chemicals used and quantities applied. The results of monitoring need to be used for **adaptive management** purposes-that is, new strategies need to be developed if the first strategy proves ineffective.

#### 3.6.6 - Pesticide Information -

The USFS has prepared Human Health and Ecological Risk Assessments (HERAs). These assessments are a recommended starting point for members who are looking for reliable information about the chemical pesticide they plan to use:

https://www.fs.usda.gov/foresthealth/protecting-forest/integrated-pest-management/pesticide-management/pesticide-risk-assessments.shtml

The FSC pest management objectives and pesticide use information can be found here: <a href="https://us.fsc.org/en-us/certification/forest-management-certification/pesticides-policy">https://us.fsc.org/en-us/certification/forest-management-certification/pesticides-policy</a>

The FSC Policy on Pesticide Use is available at:

https://fsc.org/en/document-centre/documents/resource/208

The FSC lists of highly hazardous pesticides are available at: <a href="https://fsc.org/en/document-centre/documents/resource/315">https://fsc.org/en/document-centre/documents/resource/315</a>

The attributes of these chemicals are measured by the half-life-the time required for the compound to degrade in the environment; the quantity required to form a lethal dose (or LD50 measured in milligram of chemical per kilogram of body weight); and biomagnifications-the accumulation of the compound or derivatives in fat tissue. This information is based on research and ratings by the U.S. EPA and the World Health Organization. Note that the FSC list gives chemical compound names, not trade names. Members must exercise care by reading the containers of any pesticides to find the active ingredient and verify that the compound is not prohibited by FSC and NNRG policy. They must also ensure that chemicals are never stored in unlabeled containers.

The National Pesticide Information Center website has factsheets on common pesticides. NPIC is administered by Oregon State University and is found at: <a href="http://npic.orst.edu/npicfact.htm">http://npic.orst.edu/npicfact.htm</a>

The Pesticide Action Network has a searchable database of pesticides that Members should search prior to application. The FSC Pesticide Policy lists the scientific name of pesticides which can be matched to brand names in the database: http://www.pesticideinfo.org/Search\_Products.jsp#ProdCategory

**3.6.7 - Biological Agents and GMOs -** Members should avoid planting of exotic species because these can lead to environmental damage, particularly if not carefully controlled and actively monitored. Biological agents are sometimes used to control pests-this is a risky undertaking that the NNRG program and FSC strongly discourages. If either biological control agents or exotic species are used, the Member must document the species, location and reason for its use. A more common issue in the Pacific Northwest is the pre-existing presence of invasive exotic species such as Scot's broom and Himalayan blackberry. The NNRG policy

The use of genetically modified organisms, including trees is prohibited and will result in termination of certification and Membership.

favors mechanical removal over the use of chemicals if economically feasible.

## 3.7 - Principle 7 - Management Planning

The nerve center of an FSC-certified operation is the Forest Management Plan. All Members, no matter the size of the property, must have a forest management plan, appropriate to the scale and intensity of forest management. Members benefit from the various management plan

templates created by NNRG that incorporate the requirements of Principle 7. **This is a critically important Principle that Members should read carefully.** 

Members should keep in mind that smaller and less intensely managed forest properties allow for less detailed forest management plans.

**3.7.1 - Format -** Management plans should follow the format outlined below. The cross references to other Criteria are intended to make it easier to find detailed information within the Standard. The level of detail required again depends on the size of the Member property and intensity of forest management.

Required content	Explanation
(reference to FSC National standard)	
Management objectives	What do I plan to do on my property?
	What do I want the forest to look like in the
	future?
	Consultants can help, but the owner needs to be
	the ultimate decision maker.
Description of the forest resource	Age and species composition of the forest.
	Major features within the forest, such as streams
	and historic sites.
	Legal ownership information.
Description of silvicultural systems (6.3.a)	Rate and volume of anticipated timber harvest.
Rational for rate of harvest (5.6.b)	Quantitative measurement and computation of
	current timber volume and expected growth.
Monitoring (8.2)	The forest resource must be measured regularly.
	Who will go into the forest and when?
	What will monitors look for?
Environmental protection based on	What are the risks posed by forestry?
the assessment (6.1)	How will I protect, restore or reduce negative
	impacts?
Protection of rare, threatened and	Determine presence of RTE species by database
endangered species (6.3)	research and field survey.
	List species and locations.
	Use maps.
Maps (7.1.h.1)	The scale depends on the size of the property.
	List of map subjects includes boundaries,
	management units, water bodies, protected
	sites, etc.
Justification for choice of harvesting	Based largely on the silvicultural system and the
technique (5.6, 6.5)	forest resource (timber size and topography).

Relevant documents such as maps and environmental assessments can be attached as appendices to the management plan or can be cross-referenced within the management plan. Smaller properties will generally create a single document that contains all necessary information. A management plan is valid for up to 10 years, but must be updated regularly depending on the frequency of timber harvest. Members are required to abide by the plans recorded in the management plan. Members should update the management plan following major natural disturbances or changes to management objectives and provide an up-to-date copy to NNRG. Resource managers are required to make information publicly available, thus NNRG creates a group-level summary of forest characteristics and management activities. The summary is carefully drafted; no confidential or proprietary information is given to the public without a Member's express written consent.

## 3.8 - Principle 8 - Monitoring

This principle builds on and adds detail to Principle 7 because management planning must be adaptive. Member management goals need to respond to both changing conditions within the forest resource and outside conditions such as markets. Monitoring is the process of collecting information about the forest. Adaptive management then requires Members to use the information to make informed decisions. This is the only way to determine if forest management is achieving its goals.

Monitoring also refers to the need to record and retain information on timber harvest volumes, financial records, and contractor performance, for example, as sustainable forestry also depends on sustained revenue. Member forest management plans must have a monitoring plan. Monitoring intensity depends on the property size and characteristics. Large properties, those with frequent timber harvests, and those with High Conservation Values require more detailed monitoring plans. All Members need to record monitoring results in writing.

Forest management plans must include a monitoring plan. The scope of monitoring depends on the property size, characteristics and management practices.

Members will record the results of monitoring.

**3.8.1- What to Monitor -** Criterion 8.2 lists minimum requirements of yield, growth rates, regeneration, forest condition, species composition, environmental and social impacts, and financial information (cost, productivity, efficiency of forest management), and HCVFs (see 3.9 - Principle 9 - High Conservation Value Forests). For most properties over 100 acres, professional foresters and possibly biologists are needed to do the inventory and compute results. NNRG has detailed inventory guidelines available through *Appendix 5: Online Resources*.

It is important to track these variables from year to year and over many years to get an accurate picture of forest conditions. The idea is to find changes in condition and compare that to 'desired future condition'. Members will apply the results of their monitoring by following a basic decision tree:

Is the change positive?	Is the change negative?
1. Cause of change?	1. Cause of the change?
2. Stay on track, continue	2. What can be done
monitoring.	differently?
	3. Implement a new action.

**3.8.2 - Annual Reporting to NNRG -** The information collected from the forest inventory will be used by Members to effectively manage their own property. The information must also be reported to NNRG annually. Members are obligated to file a timely Annual Renewal that gives all harvest information, as well as some yield and forest condition information. The Annual Renewal questions are found in *Appendix 1: Annual Renewal Questions*. NNRG will email the questions to Members, or send by postal mail upon request, once each year as part of the Membership renewal process. Reporting is necessary to comply with the group certification standard. As noted above, NNRG will not disclose any Member-specific information except to the Soil Association assessor.

# A big part of certification is documenting your activity.

Members need to communicate information each year to NNRG so that group forestry activity is properly recorded. NNRG relies on member reporting in order to meet its record-keeping obligations as a certified group. NNRG discloses only limited member-specific information, and only to its assessor, the Soil Association, during annual audits.

NNRG collects member information on timber harvest, roads and general forest condition using the Annual Renewal questions. Please take a look at the questions so that you can retain or collect the correct information during the course of the year to report back to NNRG.

**3.8.3 - Annual Site Monitoring -** All properties that have had significant volumes of timber harvested in a given year (greater than 5 mbf) will receive a visit from an NNRG staff person or

approved assessor. NNRG will develop a system to spot check properties such that larger properties and those with large timber harvests are more likely to receive an annual site visit. Member properties that have not harvested timber during the year may receive a site visit, either during the Soil Association sample audit of the group system or randomly. Members will not be charged for site visit costs for spot checks or the Soil Association audits if they have had no significant management impacts. The purpose of the site visit is to verify that Member properties comply with the FSC Standard and Policies. The site visit also encourages communication between the group entity and Members about FSC, NNRG, forestry, and other important topics.

**3.8.4 - Chain of Custody -** The Chain of Custody program requirements are described below in *Appendix 3: Chain of Custody*. Monitoring and record keeping are essential to chain of custody. The sale of cut logs or stumpage does not require a Chain of Custody certificate. Members keep track of certified material until possession passes to a buyer in order to ensure that the FSC supply chain is not compromised. Members are required to follow the Chain of Custody and use of FSC labeling policies. FSC-STD-40-004 is available at: <a href="https://connect.fsc.org/document-centre/documents/resource/302">https://connect.fsc.org/document-centre/documents/resource/302</a>

Members who do any value-added processing must follow the NNRG Chain of Custody procedures. NNRG has created a summary document outlining Chain of Custody procedures for Members (*Appendix 4: Chain of Custody Summary for FSC Certified NNRG Members*). Members are encouraged to include this page in their management plan and use it as a reference when selling certified products.

Chain of Custody is a system to track FSC wood from the forest of origin to the final consumer. For landowners who cut timber and sell raw logs, the Chain of Custody requires only that you keep cut logs separate from any non-FSC certified logs until a buyer takes possession of the logs.

You will also need to keep a record of the species and volume sold. Usually the buyer's mill tickets will provide the necessary information. Members who manufacture material will need to follow the more detailed procedures described in *Appendix 3: Chain of Custody*.

- 1. Landowner must maintain records of all certified and non-certified forest products sales (*Appendix 1: Annual Renewal Questions*).
- 2. Landowner must include their <u>Chain of Custody number</u> on all invoices and load tickets.

- 3. Any FSC logo use must first be approved by NNRG.
- 4. Please review Appendix 3 for additional details.

## 3.9 - Principle 9 - High Conservation Value Forests

**3.9.1 - Explanation of** *High Conservation Value Forests* - High Conservation Value Forests, abbreviated HCVF, and High Conservation Values (HCVs) are an important aspect of FSC certification. The purpose of the HCVF principal in the FSC standard is to provide adequate protection of exceptional natural sites. Larger properties and higher intensity harvesting requires closer evaluation of these factors.

Factors that contribute to High Conservation Value are:

- Exceptional biodiversity;
- Exceptionally intact forest landscapes;
- Underrepresented or rare ecological communities;
- Threatened species or ecological communities;
- Fragile ecological characteristics that could be easily damaged by active forestry operations; and
- Forests that protect water resources and human uses.
- **3.9.2 HCVF Monitoring -** NNRG monitors Member activity in relation to HCVs, based on property size and vulnerability of the conservation attributes through site visits, spot checks, and Annual Renewal reporting. The presence of HCVs, impacts upon them and mitigation of these impacts is monitored as part of the process described in section 3.8 above.

Members and their contractors must do field and documentary research to prepare an assessment of High Conservation Values (HCV). An effective assessment methodology asks six questions, described in the methods, 3.9.3, below, about the forest to determine if there are HCVs present. A qualified resource professional must make field observations and do adequate background research before making a determination. If HCVs are present, Members will need to adapt their management planning and practices to accommodate these values. NNRG staff are available to offer assistance in balancing HCVF protection with active forest management.

**3.9.3 - Methods -** Members and their contractors must assess the properties under their management for high conservation value forests. NNRG uses the FSC-US HCVF Assessment Framework. A summary of the assessment framework is available here: https://us.fsc.org/download.fsc-us-hcvf-assessment-framework.97.pdf

At the time of joining NNRG, NNRG will check the adequacy of the HCVF assessment by sending a monitor to the site to apply the framework. The framework will be used as a checklist by the monitor to verify that Members have properly identified the presence of HCVs, and can appropriately protect HCVFs.

The first element in an HCVF assessment is to evaluate **concentrations of biodiversity**. The first resource to check is the state conservation agencies, including agencies that manage natural heritage and wildlife. These agencies, and private non-profit organizations such as The Nature Conservancy and World Wildlife Fund, have maps and other resources on areas of special conservation importance. Members must determine if their property falls within these areas.

The FSC Framework gives these resources:

- State Natural Heritage Programs;
- State conservation, fish and wildlife Agencies;
- State Wildlife Action Plan;
- US Fish and Wildlife Service;
- National Marine Fisheries Service;
- Nature Serve;
- Conservation groups whose primary mission is science-based biodiversity protection and management (e.g., The Nature Conservancy, Audubon);
- Local experts (e.g. scientists, tribal experts);
- Forest Management Unit (FMU) cover type maps and forest inventory data;
- FSC's High Conservation Values Framework
   <a href="https://ic.fsc.org/en/what-is-fsc/what-we-do/strengthening-standards/high-conservation-values">https://ic.fsc.org/en/what-is-fsc/what-we-do/strengthening-standards/high-conservation-values</a>

The second HCV is **significant landscape-level forests**. The small average size of NNRG Member properties makes this less relevant. However, as larger or many small, contiguous properties join NNRG, these criteria will be evaluated.

The third HCV is **rare, threatened and endangered ecosystems**. The assessment will evaluate the size and distinctiveness of the area containing such ecosystems. Old-growth type forests are the most likely rare or threatened ecosystem on NNRG Member properties to qualify as HCV within this element.

The fourth HCV is **environmental services protection**, specifically water resources. Properties that are part of important watersheds or that have wetlands or floodplains will need to evaluate the impact of forest management and roads.

The fifth HCV is **forests that are fundamental to meeting basic needs** of local communities, such as subsistence food and medicinal plant gathering. This value is not likely to be at issue in

North America except when American Indian land uses are relevant, although it may apply when other communities rely on the forest for basic needs.

The sixth HCV is **forests that are critical to cultural identity**. This includes providing for traditional uses by local communities, such as medicinal plant gathering or religious practices. The FSC framework considers this element to apply only to American Indian uses.

**3.9.4 - Procedures -** The following procedures should be used to identify HCVFs and incorporate that information into management plans:

- Identify existing resources (maps, management plans, scientific and historical literature);
- Determine if HCVFs are present on the property of interest;
- Consult with foresters and other resource professionals, the local community, and American Indian community;
- If HCVF attributes are identified, the land manager will proceed to the next two steps below. In the absence of likely HCVs, the manager may stop here. However, Members must document the assessment and be aware of the possibility of later identification of HCVs because of, for example, new scientific knowledge or shifting habitat;
- The Management Plan must address the likely impact of management on HCVF, and propose means of minimizing negative impacts;
- There must be a monitoring plan to annually check the impact of management on HCVs.
   Monitoring must include field checks; and if management activities are causing negative
   impacts, the management plan must be adapted to attempt to reduce or eliminate the
   impact. Field checks can be informally conducted as part of other management activity.

## 3.10 - Principle 10 - Plantations

Plantations have a narrow definition for FSC purposes; not all planted forests are plantations. Plantations, under Principle 10, are characterized by a lack of natural forest structure. Plantations generally have one species that is often not native to the site, and one age class because they are generally managed on an even-aged basis. These forests are typically harvested on short rotations less than 50 years. Chemical herbicide use is common.

NNRG Members are most likely familiar with plantations on industrial forest land in Washington and Oregon. Plantations are discouraged in the FSC context because plantations are not representative of the natural forest values that FSC promotes.

FSC permits plantation forests on lands that would support natural forests only if the benefit is clearly stated in the management plan. Such plantations must have been established prior to 1994, when FSC started. Plantations must include only native tree species. On properties with a significant plantation area, at least a minimum area of land must be maintained as or restored to natural forest, depending on the total property size. Agricultural lands can be converted to plantations, but at least 10% of the land area should be restored to natural vegetation. The Standard spells out additional detailed requirements for plantations.

# 4. Appendices

## **Appendix 1: Annual Renewal Questions**

# NNRG Forest Stewardship Council® Certification Annual Renewal Questions

Fo	st: Date:			
Plε	se answer the following questions to help complete annual FSC check-in with NNRG:			
1.	Have there been any changes in property information? (e.g. ownership, easements, current use taxation)			
2.	2. Have there been any major changes in your management objectives or management plan? (Pleas note, management plans must be updated every 10 years.) a. Are you meeting your stated management objectives?			
3.	<ul> <li>Have you conducted a commercial harvest project since the last check-in?</li> <li>a. Please describe timber harvest activity below: volume, species, grade, purchaser</li> <li>b. Please describe the harvest methods, acres treated, stand prescription, and post-harvest activities</li> </ul>			
На	vest state date: Harvest end date:			
На	vest prescription:			
Ac	s treated:			

Sort	Species	Volume (tons)	Volume (MBF)	Mill	Gross Revenue (optional)	Sold FSC?

- 4. Have you conducted a pre-commercial thinning since last check-in?
  - a. If so, please describe the stand, acres, and how work was done.

- 5. Do you have plans for an upcoming harvest?
  - a. If so, when? Methods? Acres? Treatment goals?
- 6. Have you had any erosion problems? If so, please describe:
- 7. Have you used any biological control agents, genetically modified organisms, or exotic species in your forest management? If so, please describe:
- 8. Have you used any pesticides or other chemicals in your forest? If so, please provide the following information:

	Chemical 1	Chemical 2	Chemical 3
Herbicide name			
Quantity used			
Undiluted volume ( <u>required</u> )			
Diluted volume			
Date range of			
application			
Area treated			
(estimate of acres, square			
feet, or spot treatment)			
Location			
Method of application			
Target species			
Observations of			
effectiveness			
(post-herbicide monitoring)			

- 9. Has there been any new road construction? If so, please describe:
- 10. Describe any road maintenance and monitoring.
- 11. Have you had to do any bridge or culvert installation/removal? If so, please describe:
- 12. Have you conducted any management activities next to a waterbody? If so, please describe:

- 13. Do you have problems with invasive species? Which species, and how are you treating them?
- 14. Have you done any value-added manufacturing since the last check-in?
  - a. If any products have been sold as FSC certified, please share species, volume, and gross income.
- 15. Has there been any commercial harvest of non-timber forest products?
  - a. Please describe the species, volume, and area harvested:
- 16. In the last year, how much of your production/harvest forest has been regenerated naturally, and how much is regenerated by replanting? (In number of acres; this can be approximate.)
- 17. Have you had any sightings of rare, threatened, or endangered species?
  - a. Have you done any work to enhance wildlife habitat?
  - b. Is your forest enrolled in any habitat programs (ODFW, WDFW, USFWS, etc.)? If so, please describe:
- 18. Do you have old-growth in your forest, or areas that are classified as high conservation value forest (HCVF)? Please describe any changes to old-growth or HCVF since last check in.
- 19. Describe how you have monitored your forest in the past year and how you are updating your management records.
- 20. Are you currently enrolled in cost-share programs (NRCS EQIP or CSP, local Conservation District programs)? If so, please describe:
- 21. Do you need a site visit?
- 22. Anything else you'd like us to know?

## **Appendix 2: Service Provider Policies**

NNRG Members may contract with any natural resource professional meeting or exceeding NNRG minimum requirements. These services may include, but are not limited to, management plan development, harvest planning, tree marking, logging, road construction, tree plantings, or habitat enhancement.

To avoid conflicts of interest, a service provider who has actively managed a particular property shall **not** assess the same property for compliance with NNRG policies and the FSC Standard.

### **Service Provider Requirements**

It is the Member's responsibility to communicate all NNRG requirements to service providers, preferably within the context of a service contract. NNRG provides FSC standards and policies, template management plans, sample contracts, and all other documents and materials to NNRG Members via this manual, the NNRG website (www.nnrg.org), or via mail upon request.

### Service providers must:

- Strictly follow the Member's NNRG-approved management plan.
- Follow NNRG approved Chain of Custody procedures. It is the responsibility of the NNRG Member to provide adequate Chain of Custody training to staff and contractors
- Carry adequate liability insurance.
- Operate in full compliance with all applicable local, state, and federal voluntary policies, required laws, and established standards regarding natural resource management, best management practices, and/or the forestry profession.
- Demonstrate adequate ability and experience in writing, administering, and implementing management plans that meet the FSC U.S. Standard (applies only to foresters).
- Through their actions, demonstrate a willingness to work with a variety of partners to reach landowner goals.
- Through their actions, demonstrate a commitment to serving NNRG Members and helping them maintain FSC certification by complying with all NNRG policies.

All contractors must comply with NNRG policies, forest management plans, and the FSC Standard. Members may obtain recommendations for service providers from NNRG staff. NNRG has thoroughly reviewed the training, past performance and licenses, if applicable, of these recommended contractors.

Members may hire other outside contractors to complete forest management work. In this case, it is the Member's responsibility to verify that the contractor has appropriate training, meets the above listed qualifications, and complies with state health and safety laws and licensing requirements.

It is NNRG's policy to promote training and safe work practices. This includes having a designated health and safety representative, and having procedures and trainings in place to ensure adequate health and safety of all workers. NNRG will provide Members with contact information for state licensing, workplace safety, and first aid training. This information will be given by Members to contractors, if contractors are deficient in certain competencies.

See Safety Policy for links to state and federal workplace safety rules and guidance, above in Worker Rights section.

In the interest of providing continuing education opportunities for both NNRG Members and natural resource professionals, NNRG facilitates continuing education workshops on a roughly monthly basis. These workshops are intended to build skills in sustainable forest management. In addition, NNRG hosts regular field tours that focus on FSC certified forestry operations that are economically, ecologically, and socially successful.

Although NNRG does not require any specific academic qualifications for service providers, individuals or companies interested in providing services to NNRG Members will likely find it beneficial to have or obtain the following credentials:

- A two or four year degree in forestry or a closely related natural science field;
- At least five years of experience with forest management;
- At least two years of experience in forestry in the Pacific Northwest;
- Registration as a Certified Forester with the Society of American Foresters, or similar documentation of a commitment to a continuing education program;
- Washington Contract Loggers Association logger certification;
- Be FSC certified as a Resource Manager.

NNRG will determine in the Annual Renewal and during annual site visits whether the performance of contractors meets FSC criteria and NNRG policies. NNRG will issue conditions to Members if contractor work does not comply with NNRG policies. NNRG reserves the right to contact contractors to assess qualifications and competency to meet FSC requirements.

# **Appendix 3: Chain of Custody**

Chain of Custody procedures are to control and track the harvest, sale, transportation, marketing, and value-added manufacturing of FSC-certified timber from the forest to the consumer. These procedures give the FSC certification program credibility in the marketplace because chain of custody tracks certified wood at every step, and prevent dilution of the FSC brand with non-certified wood. Forest landowners can only capture the economic value of FSC certification through compliance with chain of custody (CoC) procedures. NNRG offers significant marketing assistance to Members, discussed under Principle 5 in the manual.

All Members will abide by the procedures set out for chain of custody within the FSC Documented Control System (DCS). Members that engage in value-added manufacturing will need to provide additional information and processes. NNRG will work with these Members to comply with CoC requirements. NNRG's Director of Forestry will serve as the Chain of Custody administrator for the group.

# **Documented Control System Template**

The Group Certification Standard makes NNRG responsible for creating common chain of custody procedures for all Members. The procedures are described in the Documented Control System (DCS) below. NNRG is responsible for writing procedures, providing key documents, ensuring Member compliance, and collecting group-level data. Members share chain of custody responsibility by agreeing to follow the procedures, timely seek approval for logo usage from NNRG and report annual sales information to NNRG.

Members must follow the FSC chain of custody procedures contained in the DCS when making sales of FSC products. These procedures include the process of tracking and recording the sale of FSC-certified timber, non-timber (brush, mushrooms, etc.), or manufactured products. The primary contact person on file for each Member with NNRG will be responsible for maintaining records associated with timber or forest product sales unless otherwise specified. The types of documents required include invoices, purchase orders, shipping documents or bills of lading, and inventory records, sufficient to confirm the origin and movement of FSC-certified timber from the forest to the buyer. These records must be created and retained systematically, reported to NNRG annually, and be available at the time of annual assessments.

The primary contact person for each Member will be the chain of custody administrator for that particular enterprise or property. All Members who actively engage in the sale of timber need to read and understand NNRG's procedures contained in the DCS.

### **General Procedures**

If Member sells manufactured products, the invoices for value-added products that are sold as FSC certified must include:

Name, address and phone number of the Member or Member company;

- Name and address of the buyer;
- Date;
- Quantity;
- A description of the product;
- Your FSC Chain of Custody code, SA-FM/COC-001394-XXX;
- The FSC 100% claim

Members selling logs only, will retain load tickets and mill reports. Volumes harvested will be reported to NNRG in the Annual Renewal or as requested in advance of the annual audit.

# Manufacturing

When the invoice does not accompany the product or is issued separately, the invoice must include a reference to the transport documents. For example, the truck slip or bill of lading number and date. When the invoice does not accompany the product during shipment, the shipping documents must include all of the information listed in General Procedures 1-6 above.

Value-added manufacturers need to specify if their product contains any non-certified material. Small quantities of non-certified material are considered a minor component that is exempted from CoC requirements. Chain of custody paperwork, however, must include the quantity of minor components if these are more than 1% (by weight or volume).

# **Label Usage**

All FSC certified landowners and wood products manufacturers must be in compliance with these standards. **Any use of the FSC logo must receive NNRG approval in advance.** 

Details about the new label policy can be found in the following FSC documents:

General Logo Use:

https://us.fsc.org/en/market/logo-use

Trademark Standard:

https://us.fsc.org/preview.international-trademark-standard.a-231.pdf

Trademark Quick Guide for label use:

https://us.fsc.org/preview.trademark-quick-guide-for-fsc-std-50-001-v2-0.a-668.pdf

# **Overview of Label Usage**

All FSC labels will now use the FSC "license number" for the certified company and not the company's "chain-of-custody" number. Therefore, the number on the FSC labels below is different than the CoC number provided to each Member at the time of their initial certification. The labels use the license number for NNRG's group certificate; therefore, all

NNRG members will use the same labels. However, each Member's FSC chain-of-custody number is still valid and should continue to be used on invoices for logs or lumber products along with the new FSC label.

FSC labels are organized into two general categories:

 On-product (for use directly on wood products and packaging for wood products)



 Off-product or promotional (for use on marketing materials, websites, brochures, etc.)



The mark of responsible forestry

### **Criteria for using FSC labels**

- The minimum size for on-product labels is 17mm width for portrait labels and 12 mm height for landscape labels (11mm and 8mm respectively for mini-labels).
- The labels cannot be used on the front cover of a brochure or on letterhead.
- The promotional label cannot be used on business cards. However, if the business card is printed on FSC paper, the mini on-product label can be used.
- Where the FSC label is used on invoices, the COC number must be provided along with the statement "Only the products that are identified as such on this document are FSC certified".
- The use of the name "Forest Stewardship Council" or the acronym "FSC" shall be directly accompanied by registered trademark symbol (in superscript font). The symbol is an intrinsic part of the logo, and shall be added to "FSC®" or "Forest Stewardship Council®" for the first use in any text.

# **Documented Control System for FSC Chain of Custody**

Group Administrator: Director of Forestry

Names of Members: (Retained by NNRG in Salesforce<sup>TM</sup> database);

Name of enterprise or property (if applicable): (Retained by NNRG in Salesforce<sup>TM</sup> database)

Address, phone number, email address: (Retained by NNRG in Salesforce<sup>TM</sup> database)

FSC registration number:

Date of entry into NNRG: (Retained by NNRG in Salesforce<sup>TM</sup> database)

### 1. Introduction

Brief description of Members' forest products operations.

(Retained by NNRG in Salesforce<sup>TM</sup> database) <u>The database will include information on each member's:</u> Harvest intensity and frequency; Age class categories; Forest ecological type; <u>Species</u>; and Products harvested or manufactured. This will be based on annual member reporting.

Members commit to comply with the requirements of FSC-STD-40-004.

# 2. Quality Assurance and Training

The Director of Forestry will serve as the CoC Administrator for the Group. The administrator will ensure that Members are trained in the CoC requirements. Training will be completed on an as-needed basis and may be completed during individual site visits. NNRG will maintain a record of all trainings on CoC procedures including names of those present. Any additional training done by Members for employees or contractors will be documented by the Member. A training record template is available on the NNRG website for member use, along with other relevant documents critical to each member's successful compliance with FSC procedures.

# 3. Product Groups

Members will report the products sold each year based on NNRG's Product Group List and Codes in the Annual Renewal. NNRG will retain the list and volume information in Salesforce<sup>TM</sup>. The format of the list will be as follows:

Product Group	FSC Claim	Product classification	Species or spp group	Material categories of input	Control System	Sites involved in manufacturing
Logs	100%	311-031100	DF	(If mixing or manufacturing)	(Transfer; Percentage; Or Credit)	If applicable, name and address

See full list in the FSC Chain of Custody Standard.

# 4. Material Sourcing Section 4 applies to MANUFACTURERS only

Members who purchase FSC products from other FSC-certified sources will maintain a Product source list. NNRG will retain this data, as reported to it in the Annual Renewal. For example:

Product	Species	FSC 100%	FSC Mix	FSC Mix Credit
Logs	Douglas-fir	Yes	No	No

Members who purchase logs or lumber from other FSC-certified entities, will keep a list of certified suppliers, obtain a copy of their certificates, and annually verify that suppliers' certificates are still valid by checking the list of certified companies at <a href="www.fsc.org">www.fsc.org</a>. NNRG will annually verify that major suppliers remain in good standing and alert members if any suppliers lose certification.

NNRG will retain names of all Members responsible for sourcing.

# 4.2 Material Receipt

Members who purchase material will keep a record of all FSC material received by name of supplier, supplier FSC identification number, date, quantity, and species. Members must verify that product matches invoice and purchase order.

NNRG will retain names of all Members responsible for receiving.

# 4.3 Storage and Separation

All FSC material must be stored separately from non-FSC material. FSC material must be clearly identifiable. Most Members do not mix or manufacture mixed products. Members will only sell FSC 100% forest products, unless approval is obtained in advance from the Director of Forestry. Logs and lumber will not be stored in the same area as non-certified material. FSC materials will be clearly marked with tags, log hammer marks, or id numbers to ensure that FSC material is distinguished from other material. If FSC-certified products are to be labeled, see section 6 below.

FSC material will be marked with either green paint marks, or tags bearing "FSC".

# 5. Processing

# Section 5 applies to MANUFACTURERS only

Members who process (manufacture) FSC material must be able to separate processing of FSC material from other material. Most NNRG Members produce only logs and these will be sold with an FSC 100% claim. Members who engage in processing or manufacturing of any product other than raw logs will create a customized set of procedures that must be approved by the Director of Forestry in advance. NNRG retains this information and verifies compliance annually.

# Minor inputs

If a Member uses more than 1% by volume or weight of non-FSC material in manufacturing, the Member must comply with the Controlled Wood standard FSC-STD-40-005. Member must discuss this option in advance with NNRG staff prior to going ahead with this option. **NNRG members are prohibited from using non-FSC material in manufacture.** 

Each Member who manufactures will explain the conversion factor(s) used to compute the amount of output from a given amount of input. NNRG will retain a record. (And assist in computing conversion factors, if needed). For example, X cubic feet of raw logs yields Y board feet of lumber.

Explain which accounting system is used in order to make an FSC claim. The choices are: Transfer, Percentage, and Credit systems. In the Transfer, the manufacturer simply passes along the claim on the input product to the output product. For example, if the input is FSC 100% logs, the output is FSC 100% lumber. The other systems require keeping a detailed spreadsheet of all input volumes, conversion factors, and output volumes.

Each Member who manufactures will explain their material accounting system. NNRG will retain a record of the system used. The choices are: Transfer, Percentage, and Credit systems. In the Transfer system the manufacturer simply passes along the claim on the input product to the output product. For example, if the input is FSC 100% logs, the output is FSC 100% lumber. The other systems require keeping a detailed spreadsheet of all input volumes, conversion factors, and output volumes.

# 6. Labeling

Members may use the FSC logo on products that meet labeling requirements. NNRG will approve all logo usage in advance. **The Member is responsible for obtaining advance approval and for properly affixing labels.** 

# 7. Sales and Delivery

Most transactions use only a load ticket and mill receipts. Members who manufacture must use an invoice format that includes the correct FSC registration identification and the FSC claim (FSC 100%). In addition, invoices will include a product description, volume, Member name and address, and name and address of purchaser.

# 8. Outsourcing

Members who outsource any manufacturing to a non-certified party must retain ownership of the product. Members are responsible for ensuring that the outsourced party keeps the FSC product separated from other material and that the FSC product is identifiable at all steps of the process. The Member and outsourced party must retain proper records. It is the outsourced party's responsibility to promptly notify the Member if they are ineligible to provide outsourcing services to FSC-certified organizations. An NNRG monitor will visit any outsourcing facility prior to approval. It is the Member's responsibility to have the other company sign a

standard outsourcing agreement and share that agreement with NNRG. NNRG will retain a record of all outsourcing agreements.

### 9. Record retention

Members will retain records of FSC transactions for a minimum of 5 years in either paper, electronic or both formats. NNRG retains records of sales by Member in its Saleforce<sup>TM</sup> database for 7 years. Group-level sales data will be compiled annually and will be publicly available.

### 10. Complaints Procedure

NNRG carefully considers all complaints received regarding the organization's conformity to FSC scope requirements and takes the following actions:

- Acknowledge receipt of the complaint to the complainant within two (2) weeks of receiving the complaint;
- Investigate the complaint and specify its proposed actions in response to the complaint within three (3) months. If more time is needed to complete the investigation, the complainant and the organization's certification body shall be notified;
- Take appropriate actions with respect to complaints and any deficiencies found in processes that affect conformity to the certification requirements;
- Notify the complainant and the organization's certification body when the complaint is considered to be successfully addressed and closed.

# **11. Handling Non-Conforming Products**

Members will take the following steps when non-conforming products have been mistakenly sold as certified:

- Immediately cease to sell any non-conforming products held in stock;
- Advise customers in writing within three (3) business days of the non-conforming product and maintain records of the warning;
- Evaluate the cause for occurrence of and implement measures to prevent its reoccurrence.
- Notify NNRG of the occurrence;
- Cooperate with NNRG and the certification body in order to allow the certification body to confirm that appropriate action is taken to correct this non-compliance.

NNRG has procedures in place to ensure that the commercialization of FSC certified products complies with all applicable trade and custom laws.

# **Appendix 4: Chain of Custody Summary for FSC Certified NNRG Members**

Chain of custody procedures are to control and track the harvest, sale, transportation, marketing, and value-added manufacturing of FSC-certified timber from the forest to the consumer. These procedures give the FSC certification program credibility in the marketplace because chain of custody tracks certified wood at every step, and prevent dilution of the FSC brand with non-certified wood. Forest landowners can only capture the economic value of FSC certification through compliance with chain of custody (CoC) procedures. NNRG offers significant marketing assistance to Members, discussed under Principle 5 in the manual.

All Members will abide by the procedures set out for chain of custody within the FSC Documented Control System (DCS). Members that engage in value-added manufacturing will need to provide additional information and processes (see below). NNRG will work with these Members to comply with CoC requirements.

Certified Members selling logs only must abide by the following:

- During the annual renewal phone call, landowner must report quantities of certified product sales
- Include the following information on sales invoices and load tickets:
  - 1. Member business name, contact details, and logo
  - 2. Date of sale
  - 3. Harvest site (if not FSC exclusive)
  - 4. Buyer
  - 5. Line-item certified description
  - 6. Quantity/volume for each item
  - 7. FSC chain of custody number (SA-FM/COC-001394 followed by a 1 to 3 letter acronym)
  - 8. FSC claim of FSC 100%
  - 9. Your FSC license number: C008225

All harvest records must be created and retained systematically, reported to NNRG annually, and be available at the time of annual assessments.

### **Storage and Separation**

All FSC material must be stored separately from non-FSC material. FSC material must be clearly identifiable. Logs and lumber will not be stored in the same area as non-certified material. FSC materials will be clearly marked with tags, log hammer marks, or ID numbers to ensure that FSC material is distinguished from other material. If FSC-certified products are to be labeled, contact NNRG for FSC labeling guidelines. Most Members do not mix or manufacture mixed products. However, if members are manufacturing a product that contains both FSC and non-FSC material, approval must be obtained in advance from the Director of Forestry.

### **Manufactured Products**

If a Member sells manufactured products, the invoices of value-added products that are sold as FSC certified must include the General Procedures 1-8 above. When the invoice does not accompany the product or is issued separately, the invoice must include a reference to the transport documents. For example, the truck slip or bill of lading number and date. When the invoice does not accompany the product during shipment, the shipping documents must include all of the information listed in 1-8 above. Value-added manufacturers need to specify if their product contains any non-certified material. Small quantities of non-certified material are considered a minor component that is exempted from CoC requirements. Chain of custody paperwork, however, must include the quantity of minor components if these are more than 1% (by weight or volume).

# **Handling Non-Conforming Products**

NNRG will do the following when non-conforming products have been mistakenly sold as certified:

- Immediately cease to sell any non-conforming products held in stock;
- Advise customers in writing within five (5) business days of the non-conforming product and maintain records of the warning;
- Evaluate the cause for occurrence of and implement measures to prevent its re-occurrence.
- Notify the certification body within five (5) business days of the non-conforming product and maintain records of the notice;
- Cooperate with the certification body in order to allow the certification body to confirm that appropriate action is taken to correct this non-compliance.

NNRG has procedures in place to ensure that the commercialization of FSC certified products complies with all applicable trade and custom laws.

# **Appendix 5: Online Resources**

### **Northwest Natural Resource Group**

http://nnrg.org/resources/

Management Planning and Inventory Guidelines

### **FSC**

Standards and Guidance documents <a href="https://us.fsc.org/download.fsc-us-forest-management-standard-v1-0.95.pdf">https://us.fsc.org/download.fsc-us-forest-management-standard-v1-0.95.pdf</a>

Green Building information <a href="https://us.fsc.org/en-us/market/green-building">https://us.fsc.org/en-us/market/green-building</a>

### **State Government**

Washington
Washington Department of Natural Resources
<a href="http://www.dnr.wa.gov">http://www.dnr.wa.gov</a>
1111 Washington Street SE
Olympia, WA 98504-7000
(360) 902-1000

Washington State University Extension <a href="http://forestry.wsu.edu/">http://forestry.wsu.edu/</a>

Washington Labor and Occupational Safety

On hiring a contractor:

<a href="http://www.lni.wa.gov/tradeslicensing/contractors/hirecon/">http://www.lni.wa.gov/tradeslicensing/contractors/hirecon/</a>

### <u>Oregon</u>

Oregon Department of Forestry <a href="http://www.oregon.gov/ODF/Pages/index.aspx">http://www.oregon.gov/ODF/Pages/index.aspx</a>
2600 State Street
Salem, Oregon 97310
(503) 945-7200

Oregon State University Extension <a href="http://extensionweb.forestry.oregonstate.edu/">http://extensionweb.forestry.oregonstate.edu/</a>

Oregon Department of Labor and Industries <a href="http://www.oregon.gov/BOLI/">http://www.oregon.gov/BOLI/</a>

# **Appendix 6: NNRG Member Service Agreement**



# SERVICE AGREEMENT NNRG Forestry Program & Forest Stewardship Council® Certification

### **Preamble**

### **NNRG**

Northwest Natural Resource Group (NNRG) is a non-profit organization committed to the mission to strengthen the ecological and economic vitality of Northwest forests and communities by connecting people with the knowledge, skills, and markets they need to steward their land. NNRG's Forestry Program (the Program) is organized around the goal of providing landowners that are committed to sustainable forest management with cost-effective access to Forest Stewardship Council® (FSC®) certification and a number of complementary services including:

- FSC and ecosystem market access and development
- Discounted educational workshops
- Information services and referrals to financial, educational, and other opportunities

NNRG's main office is located at: 2701 1st Avenue, Suite 240 Seattle, WA 98121

Information on NNRG and the Forestry Program is available at www.nnrg.org.

# **Member**

The individual listed in Section 11 (the NNRG Member, or the Member) has ownership and/or management rights over the forest parcels listed on the membership application as provided by the applicant to NNRG. The Member intends to have the property certified as a well-managed forest under FSC Standards and Policies, and to comply with NNRG and FSC policies for the term of this agreement. By entering into this agreement, the Member becomes part of an FSC-certified group for which NNRG is the group entity.

### **Land Parcels**

This agreement pertains to all parcels listed in NNRG's membership database, which are reviewable by the Member on request. Any parcel additions or deletions must be made by request in writing to an NNRG staff member.

# **Terms of the Agreement**

This agreement establishes the responsibilities of NNRG and the Member participating in the program.

### 1. Duration

The period of this contract is indefinite from the day of signing by the latter party.

# 2. Responsibilities

- 2.1 The NNRG Director of Forestry is responsible for overseeing compliance with the FSC Principles and Criteria, and the U.S. National Standard and FSC Policies at the Group and Member levels. The Director determines which properties are eligible for membership in the program.
- 2.2 The NNRG Director of Forestry and Member share responsibility for compliance with FSC guidelines and internal NNRG policies which are clearly stated in the Membership Manual. NNRG reserves the right to modify its membership policies after 30 days prior written notice to all members.

### 3. NNRG agrees to:

- 3.1 Provide the documents necessary for the Member to understand the requirements of certification, such as the Membership Manual, Inventory & Monitoring Guidelines, or management plan templates;
- 3.2 Complete a gap analysis process, including review and approval of the management plan, prior to Member certification;
- 3.3 Ensure adherence to FSC standards and group entity requirements on an annual basis, either through field or remote audits of Member properties;
- 3.4 Notify Members in writing when their management does not comply with FSC requirements and provide assistance in attaining compliance;
- 3.5 Maintain a record of Member properties;
- 3.6 Collect information from Members annually. This reporting is necessary to comply with FSC certification and will be retained in confidentiality. Group level summary information will be made available as required by FSC;

- 3.7 Regularly communicate with Members about changes within FSC or internal policies, as well as communicate the goals and accomplishments of the group, training opportunities, and to disseminate Member feedback;
- 3.8 Represent the entire group in annual audits, and to communicate the results of these audits. This will include explaining group- or member-level Corrective Action Requests (CARs) and the measures needed to comply with CARs;
- 3.9 Represent Members' concerns and comments regarding FSC and certifier actions and policy;
- 3.10 Provide technical assistance in identifying priorities for conservation and restoration on Member properties;
- 3.11 Provide technical assistance, including staff support, guidance documents, and referrals to forest service providers, to ensure efficient, accurate, and consistent forest inventory and monitoring;
- 3.12 Review the work and qualifications of service providers;
- 3.13 Further develop the market for FSC forest products by making market connections between buyers and sellers, coordinating marketing, and facilitating a regional supply chain;
- 3.14 Provide membership benefits that include:
  - a. Discounts on NNRG trainings
  - b. Field tours of Member and other FSC certified properties
  - c. Access to NNRG staff
  - d. Periodic newsletters
  - e. Referrals to forest service providers and appropriate government agencies
  - f. Development of ecosystem service markets such as forest carbon offsets

### 4. The Member agrees, prior to certification, to:

- 4.1 Abide by all NNRG policies and operational guidelines defined in the NNRG Membership Manual;
- 4.2 Maintain an NNRG approved forest management plan and make a long-term commitment to FSC standards;
- 4.3 Provide adequate documentation to show ownership or management rights of land parcels in the certified pool is legally secure;
- 4.4 Properly identify property boundaries on the ground prior to harvest and to verify that contractors or employees know where boundaries are located;
- 4.5 Verify and provide documentation showing that timber harvesting or other operations are legally permitted;

- 4.6 Grant access to lands in the certified pool to NNRG, the certifier staff (Soil Association) and designated contractors, following a minimum two days prior notice, to review compliance with certification standards;
- 4.7 Comply with all conditions, corrective actions, suspension or termination procedures relevant to meeting the certification standards;
- 4.8 Timely respond to the Annual Renewal check-in, which includes any commercial or non-commercial tree/ timber harvesting activity, including acreage treated and volume removed.
- 4.9 The Member will notify NNRG within 30 days of:
  - a. Material changes to their management plan. Any proposed changes must be reviewed for certification compliance and approved by NNRG;
  - b. Any change in management objectives or ownership;
  - c. Activity that could be incompatible with the Forestry Program, the principles and criteria of FSC certification, or the approved forest management plan. This may include acts by the member or acts of others, such as timber theft.

# Both parties agree to the following terms:

### 5. Fees for Service

5.1 Member will pay annual NNRG Forestry Program membership fees within 30 days of invoice date or through an NNRG approved payment plan. A reduced renewal fee is available to landowners who have not conducted significant management in the previous year as determined by NNRG.

Otherwise the standard annual renewal fee applies to all members who have conducted significant management activities, such as harvesting more than 5 mbf, in the previous year. Partial estate certification is possible under certain conditions, though landowners with more than 200 total forest acres may not apply for the Family or Small member level and will receive negotiated custom fees.

Fees as of 8/1/2011 are:

1 ees as of 0, 1, 2011 are.						
Member Level	Year 1	Reduced Annual	Standard Annual			
		Renewal	Renewal			
Family (1-100 acres)	\$350	\$75	\$250			
Small (101-200	\$450	\$150	\$350			
acres)						
Large (200 acres +)	Negotiated	Negotiated	Negotiated			

5.2 Member will pay for any contracted services related to forest management activities, such as provided by foresters, loggers, tree planters or others.

### 6. Modification

This agreement may be modified upon the mutual agreement of the parties, or their agents or assigns, in a signed writing.

# 7. Assignment

The rights and duties of this agreement may not be assigned to third parties, including purchasers for value of the member property, without the prior written consent of the parties or their legal representatives.

### 8. Conditions

If an aspect of management is largely in compliance with FSC standards and satisfactory at the Criterion level, but needs improvement to achieve indicator level compliance, NNRG can provide conditional FSC certification. NNRG will issue written pre-conditions, conditions, or non-binding recommendations to an applicant following an onsite visit and review of the management plan.

Conditions and recommendations are provided to the Member in their certification client report along with guidance on how to make the correction.

NNRG will follow up prior to the deadline to verify that corrective action has been taken. Compliance with recommendations is not required. Compliance with specific conditions will be required within a specified timeframe, most often prior to harvesting or one year, as deemed appropriate by NNRG in consultation with the landowner.

Non-compliance with a condition will result in a second repeat condition with a firm time frame for compliance, typically 30 - 90 days. Non-compliance with a repeat condition is grounds for immediate expulsion from the certified group.

### 9. Termination

Failure by NNRG or the member to abide by the provisions of this agreement shall, upon written notification by either party, be grounds for termination of the agreement. Both parties also reserve the right to terminate the agreement with 30 days written notice for any reason.

# 10. Dispute resolution

The parties reserve the right to request third-party mediation to resolve disputes arising out of this agreement. Either party may make a written request to the other to enter into mediation. The parties will select one independent, impartial mediator.