
PINCHOT INSTITUTE
FOR CONSERVATION

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**Certification of Pennsylvania State Forest Lands:
Exploring Issues and Opportunities**

**Summary Review of November 21, 1997 Workshop
Rachel Carson State Office Building
Harrisburg, Pennsylvania**

The application of independent, third-party certification of sustainable forestry practices to public forest lands poses a number of important questions. Public land managers must examine the relationship of certification to existing policies, and how certification fits into the public processes responsible for generating the existing framework of laws and procedures. The Pinchot Institute explored these issues at a workshop this past November in Harrisburg, Pennsylvania entitled *Certification of Pennsylvania's State Forest Lands: Exploring Issues and Opportunities*. Participants at the workshop included representatives of Pennsylvania-based and national conservation organizations, forest industry, academia, as well as state and federal agencies concerned with public forest management.

The workshop focused primarily on a pilot project whereby 1.2 million acres of Pennsylvania state forest lands underwent a certification review by Scientific Certification Systems (SCS), a national certifier accredited by the Forest Stewardship Council (FSC). The on-the-ground review was performed by Natural Resource Consultants, Inc., a Pennsylvania-based organization, on behalf of SCS. Other recent certification efforts were also examined, including those on state and county lands in Minnesota, and a municipal watershed around the Quabbin Reservoir in central Massachusetts (the latter two conducted by SmartWood, another FSC-accredited certifier.)

The stated objectives of the workshop were to explore:

The new and additional issues raised by the application of independent third party certification standards on public forest land, and

The potential implication for the certification of other state and federal public forest land in the United States.

Later this year, the Pinchot Institute will prepare a detailed report examining the issues unique to public lands certification. For the present, this document will briefly summarize some of the key points raised at the workshop:

What is the motivation for public land managers to seek certification?

When approached with the opportunity to conduct pilot certification projects, why did some jurisdictions opt to participate? From the presentation of Jim Grace, Director of the Pennsylvania Bureau of Forestry, as well as later comments from Catherine Mater (of Mater Engineering, Ltd., which has helped initiate many of the pilot projects involving public lands), Jerry Rose (Director of Minnesota's Division of Forestry), and others, several reasons emerged as to why some public land managers have pursued certification:

We measure up. Of threshold importance, of course, is how well the jurisdiction feels its current management practices measure up to the criteria of the third party reviewer. Pennsylvania for one, and the state and county lands in Aitken County, Minnesota for another, felt they were already abiding by or close to the Forest Stewardship Council's sustainability criteria, and were therefore not adverse to the scrutiny. In fact, they welcomed it as a chance to verify to the public that their forest lands were being sustainably managed. The public is used to discounting internally generated proclamations that «we are doing a great job,» even from trustworthy sources. A third party reviewer's assurances that «*they* are doing a great job» often carries more weight. Thus, one motivation for seeking certification is simply to validate that the agency is currently practicing (or on the road toward) sustainable forestry.

Certification helps us to clarify our management strategy. Certification is not just a matter of stamping «approved» on current practices, however--even for those jurisdictions that feel they are operating ahead of the curve. Jim Grace emphasized the fact that the review process is a method to refine current practices, to indicate where problems exist and to test longstanding assumptions over management policies. Third party review measures current practices against a set of criteria independent from the bureaucratic processes that shape the development (and sometimes hardening) of management policy. It may well provide some discomfort, and Jim cautioned other state foresters not to submit to the review unless they were feeling fairly «secure.» He added, however, that the process will make the organization stronger in the end. Certification review was thus deemed useful to test current strategies and to help shake up internalized feedback loops.

Certification provides strategic assistance in highlighting areas of concern. Even when the public agency is well aware of problems and even of possible solutions, the certification review can be an asset. The review process helps to sharpen the focus on these problems, and lends credence to the view (perhaps held by the agency already) that resolution is of critical importance. In Pennsylvania, the example given was the continuing struggle to reconcile current state policies maintaining an artificially large deer population with attempts to foster natural regeneration of forests.

The agency wants to serve as a model for other forests. A certified public forest can also serve as a «model for sustainability» for public and private forests elsewhere. This may be of particular importance in the many jurisdictions where private ownership predominates. Policies

that are tested and proven at the public level may be adopted with more confidence by private landowners who fear the unknown but are willing to follow a successful lead. Further, to the extent that the public land management agency serves as a source of information and expertise for private landowners, the public manager who has undergone the review process can advise private landowners interested in certification.

The relationship between public land management and private land management

A key point brought up at the meeting is how well public land management really serves as a model for private management, and whether public land certification experiences will translate to private lands. This is of critical importance given the vast forest areas under private ownership in this country. As pointed out by Larry Schwieger of the Western Pennsylvania Conservancy, in his state 10 of the 12 areas considered to be the most biologically diverse are under private ownership. Unless sound management policy on public lands is mirrored on private lands, the larger goals will not be met.

Though the workshop was geared toward dealing with the special difficulties of certifying public lands, it was noted that--whatever the procedural difficulties--at a substantive level certification of public lands may be *easier*. According to Jim Grace and others, public managers see more advantage in certification because they are not as singularly focused on current market forces. Public managers are keenly aware of their roles as «trustees» charged with preserving the resource for current and future citizen-owners. Concerns over the cost of certification and whether it provides any market advantage are considerations taken up in the larger context of trying to sustain the forests and to balance the expectations of a broad constituency. In contrast, private landowners may be concerned with sustainability, but the decision whether to certify is driven by less equivocal forces: «even if I meet the criteria, will the market reward me for certifying?» For some, meeting the criteria is not even a realistic consideration at this point. The daunting task, according to Jim, is getting many of these private non-industrial forests to adopt «the standards that we knew about in 1940.»

Why have some jurisdictions chosen not to certify?

Present at the meeting were several state foresters whose jurisdictions have elected not to pursue FSC certification at this time or who remain undecided. Some of the reasons given were:

Are the FSC criteria too subjective? Are they still in the development stage? Some expressed the opinion that some of the certification criteria are too «value-laden,» not based on current forestry science. Bryon Shissler, head of the Natural Resource Consultants, Inc. (NRC) review team, countered this by stating that applied science is, by necessity value-laden: we concoct scientific solutions based on what we are trying to accomplish--which, of course, are based on what we deem valuable. Even so, some public managers prefer to see how the standards develop. FSC is still in the process of finalizing standards specific to various regions in the country. These standards will modify somewhat the more general standards in place now.

Does certification mean sustainable forestry? Beyond arguments over the values that form the basis of the FSC criteria, the on-the-ground relationship between certification and sustaining the forests is still being tested. Of prime interest to many jurisdictions is the relative «efficiency» of the criteria. Are the criteria relevant? Are they sufficient, or conversely do they restrict too much? Central to this issue is whether the jurisdiction's end goal--its own concept of «sustainability»--meshes with that of FSC (again, a question of values). Some of the jurisdictions would like more time to evaluate the criteria in relation to the desired impact and to the jurisdiction's own long-term goal.

Cost of certification. Beyond the pilot projects (which have been conducted with funding from a variety of foundations) how much will certification cost? Who will pay? In the case of public lands, where the factors are more complex and the direct market analysis less straightforward, how will the cost be weighed against the perceived benefit?

Alternatives to FSC certification. At least one jurisdiction is pursuing an alternate route: Michigan is planning to evaluate its state forest lands under the Canadian Standards Association (CSA) criteria. As discussed by Bill Rockwell of the Michigan Department of Natural Resources, Bill Mankin of the Global Forest Policy Project, and Dominick DellaSala of World Wildlife Fund, CSA is not strictly an independent third party certification system in the same sense as FSC certification. Modeled after the ISO quality control system, CSA requires the manager to create and to implement its own environmental management system (EMS) which addresses environmental impacts as part of an overall management policy. Independent auditors are then employed to verify the existence of a workable system.

How successful was the certification review in Pennsylvania?

Of primary interest at the meeting was the reaction of the Pennsylvania Bureau of Forestry, now that the agency has been through the certification review. Jim Grace spoke very favorably of the experience. He felt that NRC conducted the review at «a high level» and he was satisfied with the accuracy of the review team's conclusions. (In separate comments, these observations were mirrored by Jerry Rose, who expressed satisfaction with the level of review in Minnesota's Aitken County and with the conclusions reached by the SmartWood review team as well.) Though this pilot project was not without its problems, Jim stated that overall, the process has been valuable and has served as an excellent review as the agency prepares to revise its 15-year management plan. To underscore this positive reaction, the Commonwealth of Pennsylvania announced a few days prior to the workshop that it will proceed with certification of the 1.2 million acres subject to the pilot project, and will submit the remainder of the 2.1 million acre state forest system to a certification evaluation in 1998.

The «level of review» was of particular interest in relation to these public lands projects. The projects were closely monitored to determine how well the certification process matched up to stated objectives, how consistent the scoring systems appeared to be, and whether the recommendations made by the reviewers in Pennsylvania and in Minnesota would line up with

the sustainable resource goals of the respective jurisdictions. Though the certification reviewers used entirely different scoring systems in the two states, Catherine Mater noted some correlation between the two, stating that both jurisdictions did extremely well and in both cases the scores fell in where they would be expected under the FSC criteria. USFS observers noted in relation to the Pennsylvania project that «At this preliminary stage in USFS observations, nothing associated with the processes observed or described appears to be counter to stated objectives, or contrary to the sustainable resource management goals of public forest resource management agencies.»

Jim did offer some thoughts on how the review process could be improved, however:

Basis for criteria, conditions. Notwithstanding the basic consistency with the sustainable resource goals in Pennsylvania, some of the criteria were felt to be «out in front» of current science. Setting the bar too high might discourage even progressive land managers who need to balance the needs (and demands) of competing constituencies. Jim suggested that some of the «conditions» (mandated changes) triggered by low scores on some of the more stringent criteria should instead be among the non-mandatory «recommendations.»

Scoring system. Jim expressed the opinion that the scoring system devised by SCS (the national certifying organization that employed NRC) was too complex and confusing. Unless the manager has an understanding of the weighting system and has faith in the precision with which scores are assigned, numerical scores such as «83.8" and «82.1" seem arbitrary. He felt that a simpler system might inspire more confidence and would better communicate where the manager stands on a particular item.

Peer review process. From the standpoint of the Bureau of Forestry, this was the clearest area of disappointment. Because the review included only the report itself--not the background data or the lands upon which the report is based--Jim felt the peer reviews to be somewhat superficial. In addition, he was troubled by the fact that some of the reviewers strayed from the task, and used the review process to make tangential «soapbox» comments--which then show up in the public document. (In response, Bryon Shissler indicated--at least in reference to their effect on his certification review--that tangential comments were largely ignored.)

How did public land certification differ from the standpoint of the review team?

Bryon Shissler mirrored Jim Grace's comments that the review had been a successful one. He also spoke on some of the unique issues his team faced in connection with the certification of a public entity:

Degree of openness - Public land certification reports become public documents. Public scrutiny of these reports leads to higher anxiety on the part of the land manager, who cannot afford to submit to the process unless relatively confident of the outcome. Private landowners, in contrast, can keep unfavorable assessments confidential. Therefore, while private

landowners can sit back and say «How'd we do?», public landowners must weigh carefully the pros and cons of subjecting themselves to the outside evaluation. This anxiety on the part of public managers is heightened by the fact that familiarity with FSC criteria and the certification process is still emerging.

Documentation - a much more involved and time-consuming process with public lands (the «shoe box» of documents from private landowner versus the «truckload» from the public agency). How adept is the agency itself at processing data and handling requests for information? In general, the agency should be prepared to allot more time and energy to wade through its own paperwork.

Education/communication with staff - more needed when dealing with public lands. Field staff were sometimes unaware of the particulars of the certification assessment, and did not fully understand why the central office was putting them through the exercise. Private industries' field staffs tend to be more familiar and in tune with central office policies. (Jim Grace commented on this as well--but from a positive perspective. He felt that the review process helped open up lines of communication between the central office and the field staff, and provided an opportunity to bring everyone onto the same page concerning management policy.)

Review by the landowner - feedback from private landowner is much more direct, unequivocal. Of necessity, the feedback from public agencies will be altered by the political realities within which the agency must operate. Bryon felt the certifier must be more aware of and sensitive to this in the future.

Certification as a component of a management plan

In the general discussion that followed Bryon's presentation, one of the key topics was the relationship of certification to existing management policies. If the current management plan was shaped by a process involving substantial public involvement, how can the certification guidelines be grafted onto this process so as to preserve the citizen input?

The point was made by several participants at the workshop, including Jim Grace, Jerry Rose, and Eric Palola of the National Wildlife Federation (who performed a certification review on municipal lands in the Quabbin Reservoir of Massachusetts) that certification cannot supersede existing policy--nor was it meant to. Instead, certification must be seen as a tool to achieve the pre-existing goal: sustainable forestry. The certification report can, however, act as a catalyst that precipitates rather than supersedes further public involvement. Larry Schwieger added that there is a particular need to keep grassroots groups informed of the process and in the loop, reminding workshop participants that often those who are not kept «up» on something will be, by default, «down on it.»

Other issues addressed at the meeting:

Chain of custody tracking. For a «certified wood product» label to be meaningful, the wood coming from a certified forest must be kept separate as it flows from the forest to the mill to the consumer. John Skovran, of Procter & Gamble (which maintains large commercial forests in Pennsylvania) expressed the view that there was no viable way to track the wood from certified forests through large sawmills and chip mills that receive wood from numerous sources. This problem is exacerbated by the difficulty in marketing certified wood products as a certain «percent certified» (in contrast to recycled materials, where such practice is commonplace).

Partial certification. How will FSC deal with a landowner who wishes to certify some of its lands and not others? This is a particularly relevant question for public lands--especially on the national level--in which one entity manages many geographically distinct forests. On the one hand, this «partial certification» could increase the total land abiding by the certification criteria. On the other hand, it would be difficult to certify a landowner that is practicing sound management on one parcel but is pursuing a radically different policy on another. Not only could it encourage complacency, but may justify an intensification of unsustainable practices on the non-certified tracts. A balance must be found which encourages good faith efforts and dissuades any unacceptable tradeoffs that thwart the overarching goal.

Conclusion

The evaluation of independent third party certification and its relevance to public land management is still in progress, but the Pinchot Institute feels the following observations are warranted at this time:

The Pennsylvania certification effort has been successful in achieving its intended purpose. For the Pennsylvania Bureau of Forestry, it has provided independent reassurance to the citizens of Pennsylvania that their forests are being managed to very high standards of environmentally sensitive forestry. For the Pinchot Institute, the Pennsylvania project has provided valuable insight into the questions we asked at the beginning of our involvement in the project, namely: (1) What are the unique issues involved in the application of independent third party certification standards to public forest lands? and (2) What are the potential implications for certification in other local, state, and federal forest lands?

The discussion in Harrisburg proved an extremely beneficial and candid examination of both the positive and negative aspects of the process in Pennsylvania. While, clearly, there is still room for improvement in the design of future certification efforts on public lands, the certification review performed by SCS through Natural Resource Consultants, Inc. offered a thorough and accurate assessment of the relevant forest management issues in Pennsylvania. The view from the Pennsylvania Bureau of Forestry is that the process has helped strengthen the organization and will provide guidance and clarity to the Bureau's ongoing efforts to sustainably manage the commonwealth's public forests. Independent third party certification is one of several mechanisms with the potential to advance sustainable forestry and has positive value for the management of public, as well as private, forests.