

Explanatory notes on the CEPI Comparative Matrix of Forest Certification Schemes and Standards Setting Bodies

Table of contents

1	Introduction	1
1.1	The role of the CEPI Matrix	2
1.2	Background	2
1.3	Scope and Definition	2
2	Comparative framework	2
2.1	Key requirements of forest certification	2
2.2	Variable components of forest certification	3
2.3	Role of ISO Guidelines	4
2.3.1	Guidelines for standards-setting	4
2.3.2	Guidelines for certification bodies and procedures	4
2.3.3	Guidelines for Accreditation	4
2.3.4	Guidelines for environmental claims	4
2.3.5	Guidelines for environmental management systems	5
2.4	International forestry principles	5
3	Comparative process	6
3.1	Role of CEPI and the Consultant	6
3.2	Data stages	6
3.3	Assessment and output	7
3.3.1	CEPI Key Requirements Matrix	7
3.3.2	CEPI On-line Matrix	7
3.3.3	Other reports	8

1 Introduction

1.1 The role of the CEPI Matrix

The debate surrounding forest certification has resulted in the emergence of an increasing number of standards and schemes – with the Food and Agricultural Organisation (FAO) recording some 90 different initiatives worldwide. This has raised concerns that the variety of schemes on offer might confuse both consumers and producers of forest raw materials and products. Such confusion undermines the value of forest certification both as a tool to communicate good environmental practice and to promote sustainable forestry on the ground.

The CEPI Matrix and associated website at www.forestrycertification.info are designed to help overcome these problems, providing a comprehensive source of comparative information on the world's forest certification schemes. The primary aim is to provide reliable advice to customers and companies involved in the paper and wood products trade on the status of individual forest certification schemes and the labels issued under these schemes. A secondary aim is to inform the developing international debate on harmonisation and mutual recognition of the wide variety of forest certification schemes currently under development around the world.

The website provides a set of tools for anyone that wishes to compare the content of forest certification standards, and the procedures used to certify against these standards. Users are able to obtain a complete and structured summary in .pdf format of each major forest certification scheme. Alternatively they may compare certification schemes against their own set of criteria for a credible scheme. The website allows users to comment on each certification scheme.

For representatives of forest certification schemes, the website provides for regular update of scheme details on-line. Registered schemes benefit from the wide-ranging publicity associated with the website. Registered schemes may also use the website to assess the strengths and weaknesses of their scheme against other schemes.

1.2 Background

The CEPI Matrix and associated website have been developed following a wide ranging review of existing studies to compare forest certification schemes and an extensive exercise to consult with interested parties including customers, forest owners, forest industry, environmental groups, and the representatives of forest certification schemes. The website evolved out of a project initiated by the Confederation of European Paper Industries (CEPI) in 1999 to develop a “comparative matrix of forest certification and single issue labelling schemes”. Development was undertaken by an independent consultant commissioned by CEPI.

1.3 Scope and Definition

The CEPI Matrix and associated website include information on “forest certification schemes” and “forest certification standards-setting bodies”. Throughout the development of the Matrix, CEPI has relied heavily on certification definitions derived from the International Organisation for Standardisation (ISO). ISO defines certification as:

“a procedure by which a third party gives written assurance that a product, process or service conforms to specified requirements” (ISO/IEC Guide 2: 1996).

A third party is defined as:

“a person or body that is recognised as being independent of the parties involved...the parties involved are usually supplier (first party) and purchaser (second party) interests” (ISO/IEC Guide 2: 1996).

In the Matrix a forest certification scheme is defined as a system of standards, rules and procedures for assessing conformity with specified forestry requirements. A forest certification scheme comprises at least four elements:

- **Forest certification standards** – documents, established by consensus and approved by a recognised body, which set out the forestry requirements which must be met.
- **Forest certification** – the procedure by which an independent third party gives written assurance of conformance to the forest certification standards.
- **Accreditation of forest certification bodies** – a procedure by which an authoritative body gives formal recognition that an independent third party is competent to carry out forest certification.
- **A mechanism to control claims relating to forest management** - including procedures to enforce a set of rules for organizations making these claims.

Forest certification standards-setting bodies play a more limited role and are defined as organisations that are responsible for the setting of national, regional or provincial forest certification standards.

2 Comparative framework

2.1 Key requirements of forest certification

There are many reasons for comparing forest certification schemes. Forest owners may wish to assess schemes for the contribution they will make to improved market access for forest products. Governments may wish to assess schemes for their contribution to the achievement of sustainable forestry practices and other forest policy goals. Buyers and users of paper and wood products may wish to assess schemes for their ability to provide credible guarantees of good forestry practice and the environmental credentials of forest products. This website’s primary focus is on the last objective.

Over recent years there has been an international debate concerning those features of forest certification schemes which should be regarded as essential for the provision of reliable assurances of good forestry practice. This debate is still on-going.

However, by drawing on an extensive review of the literature, a comparison of existing certification frameworks,

and comments received by stakeholders, CEPI has identified three “key requirements” that now seem to be widely recognised as the absolute minimum necessary for credible forest certification schemes.

- **ISO compatibility:** during their development and subsequent operation, forest certification schemes should follow relevant ISO standards and guides.
- **Legal compliance:** forest certification schemes should include a requirement that forestry operations comply with all relevant international and national legislation.
- **Conformance with international forestry principles:** forest certification standards should address the aspects of forest management identified in one or more sets of international forestry principles.

Throughout the Matrix website references to “key requirements” are identified with the cross-key symbol.

2.2 Variable components of forest certification

While the key requirements represent a minimum threshold for credible certification, many forest certification schemes go further in establishing additional requirements for forest management in order to satisfy the demands of specific stakeholders. However at this time, there is no international consensus on these additional requirements. Furthermore, there may be good reasons for forest certification schemes to operate to variable standards and procedures. These reasons include:

- **Differences in certification scheme objectives:** forest certification schemes have been developed with different aims and objectives in mind. For example, some schemes are focused mainly on providing market rewards for exemplary forest management through the labelling of forest products; others are focused more on promoting progressive improvement in forest management nation-wide or industry-wide.
- **Differences in the size and nature of certification applicants:** for example, while some schemes require full conformance with the ISO14001 environmental management system standard, in other schemes this is not a requirement as documentary requirements of ISO14001 are regarded as too onerous for small forest enterprises.
- **Differences in forest heritage:** the huge variability in forest types and ownership frameworks, and the very different demands placed on forests around the world, may lead to significant and justifiable variation in the content of forest certification standards.

Therefore many components of forest certification schemes may vary depending upon the schemes objectives and location. The website’s role with respect to these “variable components” is to report on how they are addressed, if at all, by each certification scheme. The website allows users to make their own comparisons and draw their own conclusions. Through the provision of reliable comparative information on these components, the website aims to contribute to the on-going international debate regarding harmonization and mutual recognition of forest certification schemes.

Some examples of “variable components” of forest certification schemes identified by CEPI include.

- actual range of interested parties involved in the standards-setting process, and the extent of their involvement;
- scope of forest certification standards over and above the scope of international forestry principles;
- detailed content of forest certification standards;
- requirements for participation and consultation during forest management planning over and above legal requirements;
- requirements for public reports from certification applicants;
- provision of specific procedures for small forest enterprises (such as group certification, or simplified standards documents);
- detailed requirements for forestry training and experience for auditing teams;
- detailed requirements for conformity assessment, including the use of objective evidence on the ground, sampling, interpretation of the standard, handling of non-compliances, and follow-up surveillance
- affiliation of accreditation body to the International Accreditation Forum
- detailed requirements for the labelling of forest products.

2.3 Role of ISO Guidelines

A useful starting point for the comparison of forest certification schemes is the International Organisation for Standardisation (ISO), an independent body based in Geneva. While forest certification has been widely practiced only since the early 1990s, ISO has been developing standards in many industrial sectors for several decades. Drawing on this experience and input from a wide range of stakeholders, ISO has drawn up a number of guides to cover:

- standard development and use
- certification bodies and procedures
- accreditation
- claims
- environmental management systems

ISO is also significant because it works closely with the World Trade Organisation (WTO) in an effort to ensure that certification meets WTO requirements and does not become a technical barrier to trade.

Drawing on an extensive review of the literature, a comparison of existing certification frameworks, and comments received by stakeholders, CEPI has identified some ISO guides as “key requirements” for credible and efficient forest certification.

2.3.1 Guidelines for standards-setting

ISO has developed a number of guidelines for standards-setting, most notably *Guide 59: Code of Good Practice for Standardisation*. This provides a widely accepted basis for minimum requirements expected of a standards-setting body and is regarded as a key requirement by CEPI. Amongst other things, ISO Guide 59 establishes requirements for standards-setting procedures, transparency, approval of standards, participation, and complaints during standards setting. It establishes that standards should be agreed using ISO’s definition of consensus. All forest certification standards-setting bodies should seek to conform with ISO Guide 59.

2.3.2 Guidelines for certification bodies and procedures

There are several ISO documents which set out the way in which a certification body should be set up and run. These rules have been developed following many years of experience and should provide the foundation for any certification body and certification process. Depending on the nature of the forest certification scheme, all certification bodies should seek to conform with one or other of the ISO Guides 62, 65, or 66:

- ISO Guide 62: 1996 (EN 45012: 1998) General requirements for bodies operating assessment and certification/registration of quality systems.*
- ISO Guide 65: 1996 (EN 45011: 1998) General requirements for bodies operating product certification systems.*
- ISO Guide 66: 1999 General requirements for bodies operating assessment and certification/registration of environmental management systems.*

2.3.3 Guidelines for Accreditation

Since the quality of certification bodies is so critical to the technical success and credibility of a scheme, CEPI regards accreditation as a key requirement of a forest certification scheme. All accreditation bodies should seek to conform with *ISO Guide 61: 1996 (EN 45010: 1998) General requirements for assessment and accreditation of certification/registration bodies*.

Membership of the International Accreditation Forum (IAF) is a good indicator of credible accreditation and certification procedures. To become a member of IAF, accreditation bodies must demonstrate conformance with ISO Guide 61.

2.3.4 Guidelines for environmental claims

Through the ISO14020 series of standards, ISO has established a common international framework for the handling of environmental claims. ISO’s principles governing claims are set out in *ISO 14020: 2000. Environmental labels and declarations – General principles*. In this document, ISO sets out 9 principles, all of which are relevant to claims about certified forests and products derived from these forests. However, due to the differing scope and objectives of forest certification and the ISO14020 series, it would be inappropriate to

require forest certification schemes to conform with the entire ISO14020 series.

The 14020 series establishes principles governing labels and claims covering the full environmental impact of a product or a service. This is in contrast to forest certification which covers only a single aspect of a product's or organisation's environmental impact. Furthermore, the 14020 series includes principles and standards governing self declaration of environmental performance by organisations. Forest certification includes only schemes involving third party certification.

In practice, forest certification schemes should conform with 8 of the 9 principles established in *ISO 14020. 2000 Environmental labels and declarations – General principles*. Only principle 5 is not directly applicable to forest certification schemes. Principle 5 states that “*the development of environmental labels and declarations shall take into consideration all relevant aspects of the life cycle of product.*” To conform with this Principle, forest certification schemes would have to be incorporated into broader procedures for life cycle assessment.

Similarly, forest certification schemes may form a component of so called “Type I environmental labelling programs” and “Type III - environmental declarations”. The principles governing Type I and Type III claims are established in ISO14021 and ISO14025 respectively. Both ISO standards require reporting on a range of environmental issues. Therefore forest certification schemes are unable to meet these standards on their own.

Subject to these considerations, CEPI regards conformance with those aspects of the ISO14020 series of standards which are appropriate to forest certification schemes as a key requirement for these schemes.

2.3.5 Guidelines for environmental management systems

The Environmental Management Systems standard, ISO14001, may be a useful reference during the development of forest certification schemes. However ISO14001 needs to be combined with forest certification standards in order to provide adequate assurance of good forestry practice. Furthermore, ISO 14001 may not be appropriate for the development of forest certification schemes in certain contexts. For example the documentation and management requirements - which were drawn up primarily for industry - may be inappropriate for small non-industrial forest owners. For these reasons, conformance with ISO14001 is not regarded by CEPI as a key requirement for forest certification schemes.

2.4 International forestry principles

The content of forest certification standards is clearly critical in determining what the certification scheme delivers, both in terms of improved forestry performance and acceptance of the scheme by different stakeholders.

At an international level, a number of processes have made significant progress in identifying the range of issues that must be addressed when defining standards of “good” or “sustainable forest management”. These processes may be traced back to the discussion of sustainable development in the Brundtland report in 1987, but were greatly developed subsequently through the UNCED and related processes.

It is now widely accepted that forest certification standards should address the aspects of forest management identified in one or more of the following sets of international principles and criteria of sustainable forest management:

Governmental

- Ministerial Conference on the Protection of Forests in Europe (MCPFE) Pan-European sustainable forest management criteria and indicators and operational guidelines.
- Montreal Process “Statement on Criteria and Indicators for the Conservation and Sustainable Management of Temperate and Boreal Forests” or “Santiago Declaration” (1995).
- International Tropical Timber Organisation (ITTO) Guidelines for Sustainable Management of Natural Tropical Forests and Guidelines for the Sustainable Management of Planted Tropical Production Forests (1993). ITTO Criteria and Indicators of Sustainable Management of Natural Tropical Forests (1998).
- The Tarapoto Proposal (1995) under the auspices of the Amazon Co-operation Treaty (ACT), criteria and indicators for the sustainable management of Amazonian forests.
- African Timber Organisation criteria and indicators for sustainable forest management in African natural tropical forests.
- National level criteria and indicators adopted by the FAO/UNEP Expert meeting on criteria and indica-

- tors for sustainable forest management in the Near East (Cairo, Egypt, 15-17 October 1996)
- The Central American Process of Lepaterique, Criteria and indicators adopted by the “Expert Meeting on Criteria & Indicators (C&I) for Sustainable Forest Management in Central America” on January 20-24, 1997.
- The criteria and indicators agreed by an UNEP/FAO Expert Meeting on Criteria and Indicators for Sustainable Forest Management in Dry Zone Africa in Nairobi, Kenya, November 21-24, 1995.

Non-Governmental

- The Forest Stewardship Council (FSC) Principles and Criteria.

3 Comparative process

3.1 Role of CEPI and the Consultant

CEPI have provided funding for and facilitated development of the Matrix and associated website. The comparative framework has been endorsed by CEPI’s Forestry Committee. As the representative trade association of Europe’s pulp, paper and board industry, CEPI’s membership encompasses Europe’s largest consumers of forest products. CEPI supported this project in order to:

- Advise members on the current operational status of individual certification schemes, the likely availability of certificates, and the meaning and content of particular certificates.
- Minimise the potential for market confusion arising from the sheer diversity and range of forest management and product certification schemes currently being developed around the world.
- Assist its members to respond when challenged on the credibility of an environmental claim based on a particular certification.

CEPI employed an independent consultant to assist with technical development of the Matrix and website. The independent consultant is Rupert Oliver, Director of Forest Industries Intelligence Ltd, a UK based company specialising in the provision of market and environmental information. He may be contacted at telephone (+44) 1756 796992 or at admin@forestrycertification.info.

Information contained in the Matrix is based on information supplied by certification schemes using the on-line questionnaire, supplemented where necessary by published information gathered by the independent consultant. A key part of the consultant’s role is to encourage accurate reporting by forest certification schemes. All data entered by forest certification schemes through the on-line questionnaire is subject to detailed analysis by the consultant to ensure that, as far as possible, it is complete, concise and consistent.

In cases where forest certification schemes decided not to complete a questionnaire, data is based entirely on research by the independent consultant.

The consultant is also responsible for assessing schemes against the requirements of relevant ISO Guides to facilitate provision of summary information in the Matrix. It is beyond the scope of this exercise to undertake a comprehensive assessment of all schemes against the ISO Guides. Such an exercise would also duplicate more thorough work that is being carried out by international schemes to assess national initiatives (i.e. by PEFC and FSC). Therefore a significant part of the analysis has focused on reviewing these international certification systems, determining the extent to which these systems will ensure ISO conformance, and drawing on their assessments when possible.

3.2 Data stages

To ensure systematic data collection and analysis, forest certification schemes are categorized on the website according to their “data stage” as follows:

- **Data stage 1:** No data yet entered. Scheme is invited to enter data on the on-line questionnaire.
- **Data stage 2:** On-line data entry has been completed by a scheme representative (preferable) or, where necessary by the consultant. Data is being analysed, summarized and interpreted by the consultant.
- **Data stage 3:** Consultants review has been completed. Data has been made available to the CEPI Working Group for further review.
- **Data stage 4:** Data undergoes a final period of review. Scheme representatives are asked to comment on CEPI’s conclusions and these are incorporated by the consultant prior to final publication. This

process will begin in September 2004.

- **Data stage 5:** Data is made available for public review. Public input is acquired using the data-commentary system. This process will begin in November 2004 with the launch of the www.forestrycertification.info website.

3.3 Assessment and output

3.3.1 CEPI Key Requirements Matrix

The CEPI Key Requirements Matrix is made available at the website in MS Word format. This Matrix is prepared by the independent consultant and is designed to provide a useful starting point for visitors to the website. Schemes are “scored” against the CEPI key requirements on a three point scale:

- Fully conformant – the scheme is believed to fully satisfy the requirement.
- Minor observation - the scheme has slight deficiencies in meeting the requirement.
- Major observation – the scheme largely fails to meet the requirement.

In making the Matrix available, it is emphasised that:

- No single set of criteria is likely to adequately accommodate the huge variety of schemes now in existence, or the range of objectives encouraging different interests to compare forest certification schemes. Other interests with different objectives may find assessment against the “key requirements” inappropriate for their needs. For this reason, it is recommended that website visitors also explore the much wider range of information relating to the “variable components” that is also made available at www.forestrycertification.info.
- Forest certification schemes are constantly evolving. The current Matrix is based on information made available to the consultant by 12 October 2004, either directly from the forest certification scheme or by analysis of published documents.
- The summary assessment contains information on schemes that have reached data stage 5 and which are undergoing public review.
- Information in the summary Matrix will be updated approximately every 4 months. Amendments will be made based on new information provided by the forest certification schemes or by registered visitors to the website using the data commentary system.
- As this comparative exercise has been undertaken entirely in the English language, and has been heavily dependent on availability of English language documentation, it is acknowledged that schemes which have not produced such documentation may have been at a disadvantage.
- Despite invitations, the Forest Stewardship Council (FSC) decided against participation in this comparative exercise. Therefore all information relating to the FSC is based on the consultant’s review of published FSC documentation. This review indicates that while comprehensive information is made readily available for FSC procedures at international level, specific information on participation and processes during standards-setting at national level is not always readily available. In the absence of direct information from FSC national initiatives, in most cases it has not been possible for the consultant to provide a valid assessment of these initiatives against the CEPI requirements.

3.3.2 CEPI On-line Matrix

The “On-line Matrix” provides a much wider range of information on forest certification schemes than the Matrix print edition. It also provides access to the data commentary system. This On-line Matrix is split into two parts:

- **Key requirements matrix:** This expands on the print edition. It compares all forest certification schemes currently available for public comment on the website. It provides a commentary by the independent consultant justifying all assessments that have been made against the key requirements.

- **Full narrative reports:** This section provides access to the full set of data available on the website. Visitors can directly compare up to three forest certification schemes across the full range of components (e.g. scheme objectives, organisation, content of forest certification and chain of custody standards, accreditation system).

Visitors to the website may comment on specific components of individual forest certification schemes by clicking on the relevant “comments” link. Anybody may comment, but they must first register their name, organisation, and contact details.

3.3.3 Other reports

A range of other reports on forest certification schemes are made available at the website on an occasional basis to emphasise different aspects of forest certification schemes. In November 2004, the following reports are available:

- Structured narrative reports (in pdf format) providing all information contained in the database on a single forest certification scheme.
- A table (in excel format) comparing the main features of 5 of the world's leading forest certification schemes: PEFC, FSC, SFI, CSA and MTCC. This table highlights that a variety of approaches to the challenge of promoting sustainable forestry are being adopted by the different forest certification schemes. It also shows that all the schemes reviewed have established high standards with respect to forestry performance, transparency, stakeholder participation, and independence.

*Prepared by Forest Industries Intelligence Limited
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