

Color Legend

Prerequisite
Credit
Better than FSC
FSC Equivalent

**Bold Blue Words = Edits within the USGBC Language**

Cp = CoC Prerequisite      Cc = Coc Credit      Chain of Custody and Labeling

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Cp1	Compliance with international normative institutions	Compliance with international normative institutions	Certification schemes require compliance with ISO 14020 and 14021 or equivalent.			
Cp2	Third party	Chain of Custody system	Certification schemes require third-party claims.			
Cp3	Restrictions on non-certified material	Acceptable non-certified sources for percent-based claims	Certification schemes require due diligence to ensure that forest products labeled as certified do not contain virgin or pre-consumer recycled wood from: 1) illegal or unauthorized sources; 2) non-certified forests of special social and environmental conservation value; 3) genetically-modified organisms, and 4) harvesting that converts natural forest to plantations / non-forest.	[in addition to existing language]. <b>Certification schemes require 2nd or 3rd party verification of all sources coming from within areas where there is evidence that activities related to items 1-4 is prevalent to ensure that these unwanted sources are avoided.</b>		
Cp4	Restrictions on non-certified material	Definition of legality	Certification schemes explicitly ban wood from illegal harvest in protected areas. Compliance with CITES is required.	<b>Certification schemes explicitly require avoiding wood from illegal harvest in protected areas sources, including harvests from areas with known systematic violation of any logging related laws in the district of origin. Certification schemes require evidence demonstrating the legality of harvests and wood purchases that includes robust and effective systems for granting licenses and harvest permits in the district of origin. Materials sourced from within areas of known illegal activity must be 2nd or 3rd party verified as legal to be acceptable as non-certified material.</b>		Illegally harvested wood appears to have a narrow definition under this prerequisite. This lowers the bar below the current FSC Criteria.
Cc1	Restrictions on non-certified material  Chain of Custody	Verification of acceptable sources	Certification schemes conduct risk assessments to determine prevalence of illegal logging. Certification schemes identify wood sourced from low-risk countries to be acceptable and require 2nd or 3rd party verification of legality for wood sourced from high-risk countries.			

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
	Transparency	Chain of Custody procedures	(There will be no benchmark on this topic in the final version, as this issue is contained within Benchmark C1: Compliance with international normative institutions.)			
	Transparency	Types of product labels	(There will be no benchmark on this topic in the final version, as this issue is contained within Benchmark C1: Compliance with international normative institutions.)			
	Transparency	Minimum certified material	(There will be no benchmark on this topic in the final version, as this issue is contained within Benchmark C1: Compliance with international normative institutions.)			

Color Legend

Prerequisite

Credit

Better than FSC Bold Blue Words = Added or Edited to USGBC Language

FSC Equivalent

Gp = Governance Prerequisite

Gc = Governance Credit

Governance

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will original Comments (Prepared March 11, 2010)
Gp1	Balance	Governing structure	The entity responsible for the certification scheme has governance structures that 1) are designed to provide balanced representation of social, environmental and economic interests; and 2) <del>allocate a maximum of 1/3 of all votes to governmental or for-profit forest owners, producers, and other entities with a commercial interest in the sale of forest products.</del>	The entity responsible for the certification scheme has governance structures that 1) are designed to provide balanced representation of social, environmental and economic interests; <b>and 2) allocate a maximum of 1/3 of all votes to governmental or for-profit forest owners, producers, and other entities with a commercial interest in the sale of forest products.</b>	How is balance measured without part 2?	GP1: Seriously impedes balanced governance by removing the 'teeth' from this vital prerequisite - stripping the maximum allowable votes given to 'for profit' forest owners, producers and commercial interests This opens 'balanced representation' to wide interpretation. <b>Action:</b> Restore the prerequisite to include item (2) as it was written.
Gp2	Balance	Decision-making I	The entity responsible for the certification scheme has policies that 1) promote consensus-based decision-making; and 2) <del>require that balloted decisions be based on approval from at least 1/3 of the representatives of environmental, social and economic interests respectively.</del> <sup>1</sup>	The entity responsible for the certification scheme has policies that 1) promote consensus-based decision-making; and <b>2) require that balloted decisions be based on approval from the majority of the representatives of environmental, social and economic interests respectively.</b>	This is especially concerning when "environmental" or "social" representatives can be hand picked and elected by current board members . This used to be a credit (chamber majority), but has disappeared. Also note that there is no longer any requirement that the organization be member-based and that the board is elected by members.	GP2: Seriously impedes balanced governance. Action: Balloted decisions should require a majority vote with at least 1/3 of the vote coming from the Triple bottom-line chambers of environmental, social, and economics. I.E. changing the USGBC MR7 Credits requires a 2/3's super majority to be accepted.
Gp3	Balance	Funding	The entity responsible for the certification scheme makes sources of funding publicly available. <sup>2</sup>			
Gp4	Public input	Consultation	The policies of the entity responsible for the certification scheme require that 1) the entity solicits input on draft standards and standards revisions from a broad range of environmental, social and economic interests; and 2) draft standards and standards undergoing revision are made available for public comment. <sup>1</sup>			

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will original Comments (Prepared March 11, 2010)
Gp5	Transparency	Communication	The entity responsible for the certification scheme 1) has developed clear policies on the avenues available for participation in scheme decision-making; and 2) makes all standards and policies publicly available.1			
Gp6	Continual improvement	Continual improvement of standards	The entity responsible for the certification scheme requires that certification standards be reviewed and revised, as needed, every five years or less.			
Gc1	Openness	Organizational type	The entity responsible for the certification scheme is a membership-based organization open to all organizations and individuals who demonstrate commitment to the scheme's guiding principles.	<b>This should be made a prerequisite.</b> The entity responsible for the certification scheme is a membership-based organization open to all <u>non-governmental</u> organizations and individuals who demonstrate commitment to the scheme's guiding principles.	<b>This should be made a prerequisite.</b> This was a prerequisite following the first public comment period. Government groups in many countries can have capacity to overly influence processes thus restricting chamber balance.	
Gc2	Compliance with international norms	Compliance with international normative institutions	The entity responsible for the certification scheme has governance structures and procedures that are consistent with ISO and/or ISEAL codes of good governance or their equivalent.			
Gc3	Openness	Establishment of governing body	The governing body of the entity responsible for the certification scheme is elected by the scheme's membership.3	<b>This should be made a prerequisite.</b>	A board of directors that is either appointed or elected by the current board of directors provides no credibility in decision-making that there is any true representation from each of the three chambers. This, along with Gc1 are the mechanisms to ensure this and should both be prerequisites.	
Gc4	Openness	Accessibility to diverse ownership types	The entity responsible for the certification scheme has standards and procedures that allow small-scale and/or low intensity operators equitable access to markets for certified forest products, and/or schemes have developed policies or other measures to improve small producer market access.1	consider as a prerequisite		
Gc5	Balance	Decision-making II	The entity responsible for the certification scheme requires that balloted decisions be based on <del>a majority vote from</del> approval from at least 1/3 of the representatives of environmental, social, and economic interests respectively.1	<b>This should be made a prerequisite.</b> The entity responsible for the certification scheme requires that balloted decisions be based <u>on a majority vote</u> from the representatives of environmental, social, and economic interests respectively	Either revise Gp2 or add this as a prerequisite.	Seriously impedes balanced governance. Action: Balloted decisions should require a majority vote with at least 1/3 of the vote coming from each of the Tripple Bottom-line chanbers of Environmental, social, and economics. If Gp2 is revised, this credit could be deleted.

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will original Comments (Prepared March 11, 2010)
Gc6	Public input	Level of standard-setting	The entity responsible for the certification scheme has developed sub-national indicators based on balanced local stakeholder input (see other governance benchmarks for a definition of "balanced" input).			
Gc7	Dispute resolution	Dispute resolution for standards-writing	The entity responsible for the certification scheme has developed formal appeals procedures that are applicable to the standard-setting process.			

# FSC EQUAL + BETTER FORESTRY INDICATORS

Updated Comments to the USGBC 3rd DRAFT Forest Certification Benchmark

05.19.2010

Color Legend

Prerequisite

Credit

Better than FSC Bold Blue Words = Edits within the USGBC Language

FSC Equivalent

Sp = Standards Prerequisite      Sc = Standards Credit Standards and Substance

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Sp1		Forest extent	Certification schemes prohibit the conversion of forest to another land use (see corresponding end note), except in those cases where such conversion: 1) occurs on a very limited portion of the forest management unit; 2) does not occur in forests of special conservation value; and/or 3) conversion enables clear long-term conservation benefits.	Certification schemes prohibit the conversion of <b>natural</b> forest to <b>a plantation or</b> another land use (see corresponding end note), except in those cases where such conversion: 1) occurs on a very limited portion of the forest management unit; 2) does not occur in forests of special conservation value; and/or 3) conversion enables clear long-term conservation benefits.	This requirement does not address the conversion of natural forests to plantations. Although technically not a loss of forest extent... certainly a loss of natural forest extent and the vast majority of values associated with forests.	Allows significant forest canopy reductions down to 10% without considering conversion.
Perkins+Will SC / Add		Natural ecosystem extent		Certification schemes prohibit conversion of any natural ecosystems to forest or other non-forest uses.	FSC Principles and Criteria do not explicitly address conversion of other important ecosystems such as grasslands or prairie to forests. This is an oversight on the developers of the Principles and Criteria and may be rectified in their revision.	
Perkins+Will SC / Add		Carbon storage	Certification scheme standards explicitly encourage forest managers to calculate the net carbon uptake of forest management and consider this information when developing forest strategies (including such activities as participation in larger-scale projects, monitoring forest carbon, and/or carbon certification).5	Certification scheme standards explicitly <b>require</b> forest managers to calculate the net carbon uptake of forest management and consider this information when developing forest strategies. Rigor of calculations may be scaled to the size and intensity of management.	FSC does not explicitly address carbon storage in forests.	

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Sp2		<b>Forests of special conservation value</b>	Certification schemes require the identification and maintenance and/or enhancement of the special attributes of forests of special conservation value. Such forests include those that 1) contain globally, regionally or nationally significant concentrations of biodiversity; 2) represent rare ecosystem types; 3) provide critical environmental services; and/or 4) are critical to providing the basic needs or traditional cultural identity of local communities. Appropriate to the scale and intensity of forest management, identification of these forests involves consultation with stakeholders and experts. Information on conservation measures is one of the pieces included in a publicly available audit report.			
Sp3		<b>Protected areas (non-special value forests)</b>	Certification schemes require the protection of representative samples of existing ecosystems in their natural state, as appropriate to the scale and intensity of forest management and uniqueness of the affected resources. <sup>6</sup>			
Sp4		<b>Ecosystem structure, function and forest successional stages</b>	Certification schemes require the maintenance and/or restoration of the structure, function, and composition of forest ecosystems within the range of natural variability. Appropriate to the scale and intensity of forest management, this includes ensuring that management within the forest unit aids in the maintenance and/or restoration of representative samples of forest successional stages, and the range of naturally occurring species, across the broader forest landscape. It also includes the provision of key habitat features for the conservation of biodiversity, and the protection of soil and water resources. <i>(Note: This is a core benchmark. All of the other environmental prerequisites/credits, Sp1-Sp16 and Sc1-Sc10, serve to elaborate upon the concepts contained in this benchmark). 7</i>			

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Sp5		Old growth I	Certification schemes in the U.S. and Canada require that the current abundance of old growth trees and old growth stand structure are maintained across the landscape, although the location of old growth stands may change over time. Schemes operating in these countries provide a definition of old growth forests that is regionally appropriate.	Certification schemes in the U.S. and Canada require that the current abundance of old growth trees and old growth stand structure are maintained across the landscape, although the location of old growth stands may change over time. <b>In landscapes where old growth is under-represented (i.e. almost all of the US outside Alaska), certification schemes require that old growth stands and structures are maintained on the FMU and recruited if they are absent on the FMU.</b> Schemes operating in these countries provide a definition of old growth forests that is regionally appropriate.	There are three things very wrong with this criterion. First, " <i>Current abundance of old growth</i> " as stated in the benchmark is very, very low in almost all areas of the US outside Alaska. Maintaining something that is very low is of little value compared to requiring it to be increased. Second, in landscapes where conservation organizations are working hard to restore some old growth, this shouldn't result in a forest manager being able to eliminate their old growth. Thus, old growth should be maintained on the forest management unit (not the landscape). Third, in areas where old growth is rare, managers should be required to manage a part of their forest for old growth values.	
Perkins+Will SC / Add		Old Growth		In landscapes where old growth is rare (and used to be more common) a proportion of the forest must be managed to restore conditions to old growth.	FSC Principles and Criteria do not explicitly require this.	



Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Sp6		Plantations	Certification schemes prohibit the certification of plantations that were converted from natural forest after 2009 unless the current owner is not responsible for their conversion. Exceptions are allowed where: 1) conversion occurs on a very limited portion of the forest management unit; 2) conversion does not occur in forests of special conservation value; 3) conversion enables clear long-term conservation benefits; and/or 4) there are demonstrated efforts, guided by long-term planning, to restore the plantation area to natural forest conditions. For this purpose, the definition of plantation is consistent with the Food and Agriculture Organization's definition for the 2005 Forest Resources Assessment. Certification schemes require that management of plantations that meet the above pre-requisites employs a precautionary approach that adheres to all other certification requirements to the degree necessary to 1) support long-term plantation health and productivity and 2) support the movement of native species across the broader landscape. <sup>8</sup>	Certification schemes prohibit the certification of plantations that were converted from natural forest after <b>1994</b> unless the current owner is not responsible for their conversion. Exceptions are allowed where: 1) conversion occurs on a very limited portion of the forest management unit; 2) conversion does not occur in forests of special conservation value; <b>and 3) conversion enables clear long-term conservation benefits. Additionally, plantations converted post 1994 may be certified when</b> there are demonstrated efforts, guided by long-term planning, to restore the plantation area to natural forest conditions. For this purpose, the definition of plantation is consistent with the Food and Agriculture Organization's definition for the 2005 Forest Resources Assessment. Certification schemes require that management of plantations that meet the above pre-requisites employs a precautionary approach that adheres to all other certification requirements to the degree necessary to 1) support long-term plantation health and productivity and 2) support the movement of native species across the broader landscape	A key fault in this indicator is that the first three items are stated as " <b>and/or</b> " meaning that they might not all need to occur (depending on how this is interpreted by USGBC). This could result in extensive conversions of forests not deemed of special conservation value to plantation and there might not be long term efforts to restore a plantation to natural forest conditions.	The FSC strongly limits certification of plantations created post 1994, therefore this allows 16 more years of plantations to be certified and it allows future land transactions to negate the prohibition. There is no strong language making the certification of plantations a strong exception.
Perkins+will SC / Add		Plantations		No certification of plantations unless there is a program in place to convert the plantation back to natural forest beginning in advance of the next harvest cycle	FSC Principles and Criteria do not explicitly require this. This is language is in part excerpted from an earlier version. Maybe this is only applicable to the US and Canada where we see very little environmental benefit from plantations (e.g. taking pressure off of natural forests).	
Sc2		Old growth II	Certification schemes (worldwide) require that the current abundance of old growth trees and old growth stand structure are maintained across the landscape, although the location of old growth stands may change over time. These requirements are accompanied by regionally appropriate definitions of old growth.			
Sc3		Tree/snag/woody debris retention	Certification schemes require retention of stand-level wildlife habitat elements (e.g. snags, nest trees, etc.). <sup>9</sup>	This should be mandatory	There is no reason why a good forest manager and certification scheme would not have these.	

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Perkins+Will Sp / Add		Clearcutting I	<del>(There will be no benchmark on this topic in the final version, as this issue is contained within Sp4: Ecosystem structure and function and Sp10: Management of natural disturbance).10</del>	Certification schemes require that along with using ecological assessments to set the appropriate size by area, any clearcut greater than (40) acres must be justified by scientific rationale including a landscape-level analysis of disturbance regimes and wildlife benefits of larger clearcuts.	FSC uses ecological assessments to establish clearcuts and define limits by area (e.g.limiting the Ozark area to 2 acres, the Pacific Coast to 6 acres and the Mississippi Alluvial Valley to 20 acres). However, pre-setting a clearcut limit with 'scientific justification required to cut more' provides a clear limit in the spirit of the Pre-cautionary Principle.	Ecologically based performance criteria for clearcuts require strong governance to set the appropriate limits (strong governance is NOT currently part of this benchmark.
Perkins+Will SC / Add		Clearcutting II		Certification schemes require that along with using ecological assessments to set the appropriate size, any clearcut greater than (20) acres must be justified by strong scientific rationale pre-approved by the certifying body and include a landscape-level analysis of disturbance regimes and wildlife benefits of larger clearcuts. Follow-up scientific evaluations must be maintained during and after periods of active forestry management. The scientific rationale and evaluations must be peer reviewed and available for public comment and observation.	Generally there are few conditions that favor concentrated management that may involve larger clearcuts - however they do exist (e.g. addressing lynx habitat in New England). In these cases, they should be justified with scientific rationale.	
Sp8		Species at risk	Certification schemes require that forest managers assess their properties for the presence of threatened and endangered species and, where present, develop and implement a plan to protect their habitat.11	Certification schemes require that forest managers assess their properties for the presence of <b>rare</b> , threatened, and endangered species and, where present, develop and implement a plan to protect their habitat.	The point of this addition is that without it, only 'legally protected' species are protected. The role of the forest manager should also include the responsibility for keeping <i>rare</i> species from <i>becoming</i> threatened or endangered.	
Sp9		Exotics	Certification schemes require control and monitoring of the use of non-native (i.e. "exotic") species in order to avoid adverse environmental effects. The use of non-native species on a large scale is allowed only when it has been adequately demonstrated that they are non-invasive and do not have significant adverse impacts on native ecosystems.			

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Sp10		Genetically-modified organisms (GMOs) I	If certification schemes allow for the use of genetically modified organisms, they require following or using risk assessment per Annex III of the Cartagena Protocol of the Convention on Biodiversity.	Certification schemes prohibit the use of genetically modified organisms.	Application of the Pre-cautionary Principle, which the USGBC identifies as a guiding principle should inform the prerequisite for GMO's. FSC bans GMO's and this ban should be retained due to the lack of control available once modified plants are introduced into the environment.	Allowing the use of GMOs significantly lowers the bar of this benchmark below FSC.
Sc4		<del>Genetically-modified organisms (GMOs) II</del>	<del>Certification schemes prohibit the use of genetically modified organisms.</del>	Not needed if the Sp 10 bans GMO's.		
Sc5		Biotechnology	Certification schemes require that the use of biotechnology is consistent with a "precautionary approach" and is based on sound science and appropriate field trials.			
Sp11		Management of Natural Disturbance	Certification schemes require the monitoring and maintenance of the health and vitality of forest ecosystems, with consideration for the naturally-occurring role of fire, pests and other natural disturbances. <sup>13</sup>			
Sp12		Chemical use	Certification schemes state a preference for natural methods, such as integrated pest management, to control plant and animal pests and diseases. It is required to minimize* the use of chemicals, using least-toxic and narrowest-spectrum pesticides** necessary to achieve management objectives. Use only pesticides registered for the intended use and applied in accordance with all label requirements. Chemicals use must be in accordance with all applicable laws. <sup>14</sup>	[In addition to the current language]... <b>Highly hazardous pesticides are prohibited from use without documented site-specific justification and approval from the certification system. Among many considerations, pesticides with the following qualities are considered highly hazardous: acute toxicity to mammals, birds, and aquatic organisms (WHO toxicity class 1a, 1b; LD50 ≤ 200 mg/kg b.w. for birds or rats; and LC50 &lt; 50 ug/l for aquatic organisms); high soil persistence, soil sorption potential, or water solubility (DT50 ≥ 90 days; Koc &lt;300 ml/g; S &gt;30 mg/l); high accumulation potential (KOW &gt; 1000).</b>	There are still chemicals regularly and legally used in forest management in the US that have been shown to have a high potential for negative non-target effects. For example, one specific high-hazard herbicide has been banned in the EU due to persistent groundwater contamination, endocrine disruption, and carcinogenicity (including to mammals and amphibians). However, the same high-hazard herbicide is still widely used in the US and it may be the most widely used herbicide in the world.	

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Sp13		<b>Environmental services I</b>	Certification schemes require the recognition, maintenance and, where appropriate, enhancement of the value of environmental services provided by forests such as biogeochemical cycling, the protection of water supplies, and the conservation of wildlife and fisheries.			
Sp14		<b>Reforestation I</b>	Certification schemes require that forest managers reforest in a timely manner.15			
Sp15		<b>Soil productivity</b>	Certification schemes require that forest management maintain or enhance soil productivity.16			
Sc6		<b>Timber production</b>	Certification schemes require that timber harvest levels are sustainable over periods of ten years or less.	[in addition to the current language]... <b>for forest ownerships greater than 1000 hectares.</b>	If USGBC wants to be accessible to small ownerships, this doesn't make sense.	
Sc7		<b>Non-timber forest products</b>	Certification schemes require that the rate of harvest of non-timber forest products does not exceed that which can be sustained over the long term.17	This should be a Prerequisite		
Sc8		<b>Environmental services II</b>	Certification schemes encourage forest managers to consider the full range of environmental services forests provide and explore alternative markets for environmental services.18			
Sc9		<b>Reforestation II</b>	Certification schemes require that reforestation meets targets that have been established, through credible sources, for stocking levels and time frames based on forest type.			
Sp16		<b>Riparian protection</b>	Certification schemes require that forest management protects the structure and function of riparian areas. To this end, schemes require the observance of state-recognized Best Management Practices where they exist. In areas without relevant regulations or Best Management Practices, schemes require the development of guidelines for the protection of riparian areas and wetlands.19			
Sp17		<b>Physical infrastructure (roads, skid trails, etc.)</b>	Certification schemes require the minimizing of damage to forest ecosystems resulting from construction of roads, skid trails and other physical infrastructures. Road planning and/or road management programs are developed appropriate to the scale and intensity of forest management.			

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Sc10		Soil protection	Certification schemes require that forest management minimize and mitigate disturbance and damage to soil resources.	This should be a Prerequisite		
		Residual tree protection	(There will be no benchmark on this topic in the final version, as this issue is contained within Sp4: Ecosystem structure and function and Sc3: Tree/snag/woody debris protection.) <sup>20</sup>			
Sp18		Community benefit	Certification schemes require the recognition and respect of the traditional and legal rights of local communities. They also require, appropriate to the scale and intensity of forest management, the promotion of the long-term health and well-being of communities within or adjacent to the forest management area. This includes the recognition and respect of the traditional and legal rights of indigenous peoples to their lands and resources. <sup>21</sup> {Note: This is a core benchmark that outlines a broad goal of sustainable forest management. Sp18-Sp28 and and Sc11-Sc20 are all of relevance in meeting this goal.}	Certification schemes require the recognition and respect of the traditional and legal rights of local communities. They also require, appropriate to the scale and intensity of forest management, the promotion of the long-term health and well-being of communities within or adjacent to the forest management area. <del>This includes the recognition and respect of the traditional and legal rights of indigenous peoples to their lands and resources.<sup>21</sup></del> {Note: This is a core benchmark that outlines a broad goal of sustainable forest management. Sp18-Sp28 and and Sc11-Sc20 are all of relevance in meeting this goal.}	Indigenous rights, including their recognition as sovereign and with ceded resources and use permits, are separate from community benefit and should be dealt with separately.	
Sp19		Right to organize	Certification schemes require observance of fair labor practices across all operations.	Certification schemes require <b>recognition of the rights of workers to organize and voluntarily negotiate with their employers as outlined in ILO Conventions 87 and 98.</b>		"Observance of fair labor practices" removes the teeth from the right to organize. This lowers the bar from FSC standards.
Sp20		Wages	Certification schemes require compliance with all applicable wage laws.			
Sp21		Compensation	Certification schemes require that local people are given opportunities to register grievances, without threat of reprisal, and that compensation be provided for loss of, or damage to, legal and customary rights, property, resources, or livelihoods. Adequate provision of such opportunities may involve informal communications or formalized complaint mechanisms depending on such factors as existing legal frameworks and the scale and intensity of forest management. <sup>22</sup>			
Sp22		Health and Safety	Certification schemes require compliance with all applicable laws and regulations covering health and safety of employees and their families.			

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Sp23		<b>Public Consultation I</b>	Certification schemes require that people and groups directly affected by management operations are provided with opportunities for input and consultation. A public summary of management plans must also be made available. Public consultation and communication is appropriate to the scale and intensity of forest management			
Sc11		<b>Public Consultation II</b>	Certification schemes require public consultation regarding the determination/verification of environmental components (e.g. forests of special conservation value) and social components (e.g. cultural values and community impacts) of forest management. Public consultation must explicitly include external stakeholders and experts.	This should be a Prerequisite	This would replace or be complementary to Sp23.	
Sc12		<b>Recreation, public access</b>	Certification schemes require that forest management operations take into account impacts on recreational activities and public access (as supported by law). <sup>23</sup>			
Sc13		<b>Aesthetics</b>	Certification schemes require that forest management operations take into account the aesthetic values of forests. <sup>24</sup>			
		<b>Public lands</b>	(There will be no benchmark on this topic in the final version, as this issue is contained within Sp22 and Sc11: Public Consultation I and II) <sup>25</sup>			
Sp24		<b>Economic viability</b>	Certification schemes require that forest operations strive towards economic viability. <sup>26</sup>			
		<b>Utilization</b>	(There will be no benchmark on this topic in the final version, as this issue is contained within Benchmark Sp4: Ecosystem structure and function.) <sup>27</sup>			
Sc14		<del>Aberiginal land and tenure rights</del>	<del>Certification schemes require the recognition and respect of the traditional and legal rights of indigenous peoples to their lands and resources. Free and informed consent is required for other parties to manage and/or use indigenous lands and resources.<sup>27</sup> (Equivalent language has been added to Sp18: Community Benefit.)</del>	This should be a Prerequisite.... <b>Certification schemes require the recognition and respect of the traditional and legal rights of indigenous peoples to their lands and resources. Free and informed consent is required for other parties to manage and/or use indigenous lands and resources.</b>	Should be its own criterion and it should be mandatory.	

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Sc15  Sc16		Special aboriginal sites	Certification schemes require the identification and protection of special aboriginal sites based on available documentation and, where desired by the affected tribes, the participation of those tribes.	This should be a Prerequisite.... <b>Certification schemes require the identification and protection of special aboriginal sites based on available documentation and, where desired by the affected tribes, the participation of those tribes.</b>	A serious oversight that this is not mandatory	
		Traditional knowledge	Certification schemes require that indigenous peoples are compensated for use of their traditional knowledge regarding forest species and/or forest management systems. Free and informed consent regarding the means and amount of compensation must be obtained before the application of such knowledge.	This should be a Prerequisite....		
Sp25		Forest Law	Certification schemes require compliance with all forest related international agreements (within signatory countries), and forest-related national and local laws and			
Sp26		Land tenure	Certification schemes require that property rights and land tenure are clearly defined, and that forest operators comply with all legislation relating to property rights. As consistent with national norms for forest use, schemes also require recognition and respect of the legal and customary rights of local communities to access and/or use forest resources.			
Sp27		Management plan	Certification schemes require, appropriate to the scale and intensity of forest management, that forest management plans and/or supporting documents be written and implemented that state the long-term objectives of forest management, and, consistent with those objectives, address forest resource protection, inventory, yield determination, harvesting practices, silviculture, monitoring and any other major forest management activities (FAO 1998). Schemes also require that management plans be periodically revised as needed to incorporate the results of monitoring and to address changing environmental, social and economic conditions. <sup>29</sup>			

Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Sp28		Monitoring	Certification schemes require, appropriate to the scale and intensity of forest management, monitoring that assesses the condition of the forest, yield of forest products, and the social and environmental impacts of forest practices. <sup>30</sup>			
		Impact assessment	(There will be no benchmark on this topic in the final version, as this issue is contained within Benchmark Sp27: Monitoring.)			
		Continual improvement	(There will be no benchmark on this topic in the final version, as this issue is contained within Sp26: Management Plan and Sp27: Monitoring.)			
Sp29		Infrastructure and process	Certification schemes require that, appropriate to the scale and intensity of forest management: 1) responsibility is clearly assigned regarding compliance with management objectives and planning; 2) there is a mechanism for employee and public input on compliance with management objectives and planning.			
Sc17		Procurement	Certification schemes require, appropriate to the scale and intensity of forest management, that forest products procured from outside sources are sourced from operations that observe Best Management Practices and utilize trained loggers. Education and outreach is conducted among non-certified operators regarding reforestation and protection of endangered species.			
Sc18		Training	Certification schemes require that workers be adequately trained to meet certification standards. Appropriate to the scale and intensity of forest management, residents within or adjacent to the forest management area are given opportunities for employment, training and other services.	This should be a Prerequisite....		
Sc19		Education and Outreach	Certification schemes require, appropriate to the scale and intensity of forest management, the promotion at support of state, provincial and other levels, mechanisms for public outreach, education, and involvement related to forest management.			



Prerequisite/ Credit Number	General Concept	Policy Criteria	Current USGBC Requirement(s) (As stated in 3rd comment period)	Perkins+Will Updated Comments (Prepared May 19, 2010) FSC Equivalent + Better Indicators	Rationale (May 19 Updates)	Perkins+Will Initial Comments (Prepared March 11, 2010)
Sc20		Research	Certification schemes require, appropriate to the scale and intensity of forest management, the provision of in-kind support or funding (individually, or through cooperative efforts or associations) for forest research to improve the health, productivity and management of forest resources.			