



FSC Advice Note

File name FSC-ADV-20-008 EN Controlled wood and windthrow

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Status Approved

Advice sought on Can windthrow be treated as FSC Controlled Wood?

FSC Advice

Windthrow from forests certified against *FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship* would be classified as FSC-certified wood, and windthrow from forests certified against *FSC-STD-30-010 FSC Controlled Wood Standard for forest management enterprises* would be classified as controlled wood.

1. Windthrow from other areas would not always automatically be considered as 'controlled wood'.
2. Windthrow in non-FSC certified forest areas shall be evaluated for compliance with *STD-40-005 FSC standard for company evaluation of controlled wood* to determine whether the source is considered 'high risk' or 'low risk' in terms of the controversial management practices identified in that standard.
3. If the source is in a district that is considered high risk, then it shall be evaluated at the forest management unit level for compliance with *FSC-STD-30-010 FSC Controlled Wood Standard for forest management enterprises*.
4. Alternatively, it is acceptable for a balanced (i.e. including social, environmental and economic stakeholders) and appropriately constituted national or sub-national standards development group to carry out its own evaluation and stakeholder consultation regarding a district affected by windthrow, and to make a recommendation that in a particular case a whole district affected by windthrow should be considered 'low risk' for one or more attributes of *FSC-STD-40-005 FSC standard for company evaluation of controlled wood*. Such an evaluation shall include a report outlining the district or districts covered by the recommendation; the categories of controlled wood as outlined in *FSC-STD-40-005 FSC standard for company evaluation of controlled wood* covered by the recommendation (e.g. threatened high conservation values, social conflict etc.); rationale for the recommendation; stakeholders consulted and any additional considerations that should be taken into account e.g. compliance with relevant law. The final report and recommendation shall be sent to the FSC International Center.
5. Such an evaluation may consider windthrow to be a special case in the case of consideration of potential impacts on High Conservation Value areas. The group may recommend that although normal harvesting in the district might threaten high conservation values (and could therefore result in the district being considered high risk for this aspect), the processing of windthrow would be a special case for which risk could be considered low.
6. Such an evaluation shall consider the potential threats to high conservation values present in particular any threat presented by machinery used for its removal from the

forest area.

7. Windthrow which does not meet the requirements outlined above shall not be treated as controlled wood.
8. Windthrow does not comply with FSC definitions for post-consumer or other reclaimed wood (*FSC-STD-01-002 Glossary of terms*).

Basis for advice

9. FSC standards for chain of custody and labelling of wood products (e.g. *FSC-STD-40-004 FSC Chain of Custody standard for companies supplying and manufacturing FSC-certified products*) require that all wood be categorised as a) FSC-certified wood, b) post-consumer reclaimed wood, c) other reclaimed wood, d) controlled material, or e) uncontrolled material.
10. If the district in which the windthrow has occurred (i.e. a defined geographical area that may cover many forest management units, or be at the level of a country or region) is already identified as low risk for all the attributes identified in the controlled wood standard, then all wood (whether windthrow or normally harvested) from that district would automatically be considered low risk - and could therefore be considered to be controlled.
11. If the district is considered high risk for one or more of the attributes identified in *FSC-STD-40-005*, then FMUs in the district would need to be evaluated case-by-case for compliance with the applicable elements of *FSC-STD-30-010*, unless it is accepted that large-scale windthrow creates a special case and that processing of windthrow should be considered acceptable whether or not the general management of the forest itself meets the requirements specified in *FSC-STD-30-010*.
12. Review of *FSC-STD-30-010* suggests that the extent to which large-scale windthrow creates a special case should be considered for each of the five critical attributes of the standard separately.
13. In the case of wood harvested from High Conservation Value (HCV) areas (section 4 of the standard) a case can be made that the responsible processing of windthrow might not contribute to potential damage to those values, whether or not 'normal' harvesting in accordance with a pre-existing management plan would have done so. If so, this could justify the consideration of processing windthrow as a special case.
14. It must however be recognised that removing windthrow can be a threat to HCVs, depending on the HCV under consideration. Windthrow is a key element of many normal ecosystems, and windthrow may represent an opportunity to restore habitats that have been eliminated or seriously diminished by previous management regimes. Machinery used for the removal of windthrow may lead to compaction of soil or other damage to the high conservation values present. It cannot be assumed that harvesting windthrow is an inherently benign activity. These considerations must be taken into proper account in deciding whether the policies and procedures for harvesting windthrow may be considered 'low risk' in respect of damage to HCVs in the district. Such an evaluation must therefore include consultation with social and environmental stakeholder representatives.
15. The argument made in paragraph 6, above, does not seem to hold for the remaining issues identified in the controlled wood standards. For example, in the case of genetically modified (GM) trees (section 5 of the standard), there does not seem to be justification for considering wood to be non-controversial simply because it has been blown by wind rather than harvested commercially. Similarly, it is not clear that illegally harvested wood (section 6), wood harvested from converted natural forest (section 7), or wood from districts where traditional or civil rights are violated should be treated

differently simply because it has been blown over rather than harvested commercially.

16. In the case of large-scale windthrow, decisions and action may need to be taken relatively quickly to ensure that wood does not deteriorate and to protect against outbreaks of pests. There would be clear benefits for affected forest managers if a timely, district-based evaluation of compliance with *FSC-STD-40-005* could be implemented. An evaluation and formal recommendation on this issue by a balanced and appropriately constituted standards development group (e.g. an FSC-accredited Working Group) would be an example of an appropriate mechanism for decision making, which could take place in a timely manner.

References

FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship

FSC-STD-01-002 Glossary of terms

FSC-STD-30-010 FSC Controlled Wood Standard for forest management enterprises

FSC-STD-40-004 FSC Chain of Custody standard for companies supplying and manufacturing FSC-certified products

FSC-STD-40-005 FSC standard for company evaluation of controlled wood