

Forest Certification Understanding Ecolabel Usage Requirements

Roy C. Anderson & Eric N. Hansen



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Peter Johnson
Canadian Standards Association
International Forest Products Group

Paul Wooding, RPF
Manager, Forestry Certification & Market Access
Canadian Forest Products Ltd.

Lee Jimerson
Sales Manager
Collins Companies, LLC

Suzanne L'Erario
Manager, Sustainable Forestry Outreach
American Forest & Paper Association

Jim James
Director Environmental Affairs
Sustainable Forestry
Weyerhaeuser Company

Mr. Jaroslav Tymrak
PEFC Council Technical Expert
Programme for the Endorsement of Forest Certification schemes

Sheldon Zakreski
Policy Analyst
Metafore

Rick Fletcher
Professor
Associate Director of the Sustainable Forestry Partnership
Oregon State University

Forest Certification: Understanding Ecolabel Usage Requirements

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Overview

First introduced in the late 1980's, the concept of forest certification continues to evolve and develop. One example of this evolution is the development of four major certification schemes (CSA, FSC, PEFC, SFI) each competing for recognition in the marketplace (Hansen et al. 1999). Each of the four schemes takes a slightly different approach to certification. These differences often cause confusion and misunderstanding within the forest products industry. Therefore, this paper briefly explains the broad concept of forest certification¹ and then focuses on describing two components of third-party forest certification schemes – ecolabel usage and the steps that must be taken in order to use the label. The principles of both components are discussed among the four forest certification schemes that are most relevant in North America and Europe. Globally, many systems currently exist or are under development.

The Components of Forest Certification

Third-party forest certification programs consist of three components: 1) *forest certification* – the evaluation of forest operations against a predetermined criteria, 2) *Chain-of-custody (COC)* – a system for addressing the origin of raw materials, and 3) *ecolabels* – labels that appear on products, which include raw material originating in certified forests. The following sections offer a more detailed description of each component.

Forest Certification

Since not all states have laws governing forestlands, management of forest ecosystems is often considered inadequate (Vogt et al. 1999). Therefore, third party forest certification was introduced as a method for improving forest management. Forest certification is the process by which an independent entity evaluates the performance of on-the-ground forestry operations against predetermined criteria. Certified forests are those forestry operations judged to conform to the criteria. Through this process, forestland managers are recognized for their responsible forest management practices.

¹ This paper compliments a previous forest certification report from the OSU Extension Service. The interested reader can download the earlier report from the following website:
<http://eesc.orst.edu/agcomwebfile/edmat/EC1518.pdf>

Ecolabels

Forest certification also has marketing implications, since many proponents believe that consumers prefer to purchase products derived from well-managed forests. Ecolabels are the marketing mechanism used to distinguish certified products from similar non-certified products. An ecolabel is an on-product label meant to inform consumers that the product differs from similar products based on environmental impacts that may be associated with the production, distribution, use, or disposal of the product. **In the case of forest certification, the ecolabel only signals that the raw material used to make the product has come through a forest certification system.** For this reason, forest certification ecolabels are often referred to as single-issue labels. It is important to note that ecolabels differ from many “green” claims made by manufacturers, because ecolabel claims are verified by an independent third-party.

Each forest certification scheme is responsible for determining exactly what its ecolabel means. This system differs from that used, for example, with ecolabeling of organic foods. Since 2001, the United States Department of Agriculture’s National Organic Program has defined and regulated the use of the term “organic”. Before 2001, similar to forest certification, a number of independent certifying agencies determined exactly what the term “organic” meant. Many believe that a unified ecolabel would facilitate commerce in organic foods. Forest certification ecolabels may follow a similar evolutionary trend.

Forest certification schemes classify ecolabel use into two categories: (1) On-product – this usage refers to the actual label placed on the product or it’s packaging to identify and promote products derived from certified forests. (2) Off-product – this usage refers to those logo or insignia placed on brochures, websites, advertising, and other forms of communication to demonstrate participation in the program. (Under trademark law, a certification mark registered for on-product use may only be used on a product.).

Chain of Custody (COC)

Many wood products undergo several processing stages before their final use. For example, trees are harvested and converted to logs. Logs can be processed into lumber. Lumber is then used to make products such as flooring, molding, furniture, etc. At each processing stage, (e.g. standing trees, logs, lumber) ownership of the wood raw material is typically transferred. The many stages of wood processing means that wood products are often owned by many entities before reaching the final consumer. In the case of certified wood, this “multi-step”, value-adding process means that the integrity of claims made about the wood’s certified origin may be questioned. Therefore, to assure consumers that forest products bearing ecolabels actually come from certified forests, many forest certification schemes include a COC component. COC may involve tracking and documenting a product

through all phases of ownership, processing, and transportation between the certified forest and the final consumer. Other COC schemes focus on requirements for the overall improvement of forest management, in recognition of the hundreds of thousands of private entities that own over 60% of the forestland in the US.

Depending on the type of operation, the certification system, and the type of label being sought, firms generally approach COC verification in one of two ways - the *Percentage Model* or the *Physical Separation Model*. The percentage model uses inventory control and the accounting of wood flows under the premise that the percentage of certified finished product equals the percentage of certified input. Program participants using the physical separation model must keep each batch of certified material physically separate from all other wood at every stage from harvesting, transport, processing, and shipment. Either of these methods can be applied to: a batch of products, a single production unit, or the operation of the whole enterprise.

Some forest certification systems require that the, COC itself be certified by an independent, third party verifier. For a product to bear an ecolabel, all ownership transfers encountered in its journey from the forest to the consumer must be covered by COC certification, e.g. an ecolabeled piece of flooring on a retail shelf must be covered by COC certification from the forest landowner, sawmill, and secondary processor. Through this process, customers are assured that a firm's product sources are verifiable. Similarly, schemes relying on educational and monitoring requirements will typically require independent, third party certification to verify conformance.

Chain of Custody and Ecolabel Schemes in the North American Marketplace

In North America, there are four relevant forest certification/COC/ecolabeling schemes currently in use^{2,3}. For each of the four schemes, the next section provides a general description of the scheme, a list of requirements for COC certification, and guidelines for ecolabel use. In some cases, the COC and ecolabel usage rules are quite complex. Therefore, we only provide an overview of each, and offer links to publications that contain a full description of the certification guidelines.

² Green-tag certification is relevant in NA, but currently lacks the scale to be considered here. For further information about the Green-tag program see - <http://www.woodlandowners.org/greentag/greentag.asp>

³ The American Tree Farm System (ATFS) is designed for use by non-industrial woodland owners. ATFS has been mutually recognized by the SFI program and is considered here within the context of SFI. For further information about ATFS see- <http://www.treefarmssystem.org/>

CSA – Canada’s National Sustainable Forest Management Standard

The CSA forest certification scheme is a program of CSA International⁴, a provider of product testing and certification services. CSA has published over 1,800 consensus standards and guidelines in 37 fields. In 1996, they published Canada's National Standard for Sustainable Forest Management - CAN/CSA Z809⁵. The standard was developed with input from representatives of environmental, government, industry, academic, and consultant organizations. It requires program participants to establish a comprehensive sustainable forest management plan and on-the-ground performance standards. At a minimum, program participants must address 17 critical elements set by the Canadian Council of Forest Ministers and local values identified in the public participation process (CMSA 2002). To become certified to the standard, participants must undergo a third-party audit, which is conducted by a certifier accredited by the Standards Council of Canada. Once a program participant has been forest management certified they can also choose to become COC certified.

CSA COC Requirements

The CSA COC criteria are designed to ensure that the origin of certified materials and finished products are verifiable and documented, before during and after manufacturing, storage, and shipping. CSA’s COC criteria are described in the document **CSA Plus 1163**⁶. Specifically, Clause 4 outlines 12 CSA COC requirements. Included in the 12 requirements are:

- A commitment from a company’s management to COC
- A documented control system that specifies which personnel are responsible for COC
- An explanation of the procedures required to verify the origin of wood raw material and products
- An inventory control and accounting system capable of documenting wood raw material flows (note that CSA allows this to be done by an input/output system, minimum average percentage system, or physical separation)

The CSA COC requirements are verified by an independent third party.

⁴ The Canadian Standards Association website: <http://www.certifiedwood.csa.ca>

⁵ This document can be downloaded from:

<http://www.certifiedwood.csa.ca>

⁶ This document can be downloaded from: <http://www.certifiedwood.csa.ca>

CSA Label Use Requirements

The final component of CSA’s sustainable forest management program is the CSA “Forest Products Marking Program”. The intent of the program is to allow retailers, manufacturers, homebuilders and consumers who support responsible forest management to more easily identify which products come from forests certified to CAN/CSA Z809 Canada's National Standard for Sustainable Forest Management (CSA 2003). This is accomplished using forest certification ecolabels on products that have been tracked under CSA’s COC system from their origin in a CAN/CSA Z809 forest through all phases of ownership to a final consumer. These products can include everything from lumber, paneling or plywood, and pulp and paper to specialty forest products such as maple syrup and Christmas trees (CSA 2003). Within the CSA Forest Products Marking Program are three labeling options – each based on how the inventory of certified forest products are managed. The three labels are as follows:



100% of the product has been tracked and monitored from its point of origin (a Z809 certified forest) to the end consumer. This mark appears on the product and/or the packaging.



At least 70% of the input used to make this product line has been tracked and monitored from its point of origin (a Z809 certified forest) to the end consumer. This mark appears on product and/or packaging. None of the wood-based raw materials shall have come from Controversial Sources.



At least 70% of the content of this composite product has been tracked and monitored from its point of origin (a Z809 certified forest) to the end consumer. This mark appears on the product and/or the packaging. None of the wood-based raw materials shall have come from Controversial Sources.

Figure 1. Three versions of CSA forest products marking program ecolabel

Forest Stewardship Council

The Forest Stewardship Council⁷ (FSC) was founded in 1993 by representatives from environmental and conservation groups, timber industry, the forestry profession, indigenous peoples' organizations, community forestry groups and forest product certification organizations. The FSC is headquartered in Bonn, Germany and have regional offices worldwide. According to the FSC, its mission is to support environmentally appropriate, socially beneficial, and economically viable management of the world's forests. FSC's main tool for achieving this mission is a forest certification, COC, and product-labeling scheme (FSC 2003).

The FSC fulfills dual roles. First, it sets the forest management standards and COC criteria. For example, the FSC has set 10 forest management principles covering topics such as management planning, plantation management and environmental impact. However, the FSC does not actually inspect forests or verify COC. Instead, its second role is the accreditation of certification bodies, which are charged with the responsibility of inspection. Thirteen organizations are currently accredited by FSC to perform worldwide certification services. The most active accredited certification bodies in North America are – Scientific Certification Systems (SCS)⁸, Smartwood (SW)⁹, KPMG Forest Certification Services Inc. (FCSI)¹⁰, and the SGS Qualifor (SGS)¹¹.

FSC COC Certification Requirements

The FSC COC criteria are designed to ensure that the origin of certified materials and finished products are verifiable and documented, before during and after manufacturing, storage, and shipping. To become FSC COC certified, entities must meet six principles. They are:

- Designation of a person at each location or facility with lead responsibility for enforcing COC procedures.
- When purchasing materials, the company must specify certified (e.g. purchase orders must request certified material) and then verify their certified status upon receipt (e.g. bills of lading and invoices must include the vendors certification code). The company must also maintain an inventory of certified material.
- During processing of materials under the physical separation model the company must use distinguishing marks on certified materials, and calculate approximate conversion factors for certified volume in/certified volume out. If the company produces a product with a mix of certified

⁷ FSC website: <http://www.fscus.org/>

⁸ Scientific Certification Systems website: <http://www.scs1.com/>

⁹ Smartwood website: <http://www.smartwood.org/>

¹⁰ KPMG website: <http://www.kpmg.ca>

¹¹ SGS Qualifor website: <http://www.sgsqualifor.com>

and non-certified material, the company must conform to the FSC's policy on percentage-based claims (*see "percentage based claims" for an explanation*).

- Prior to shipping, the company must store finished certified products separately and identify them with distinguishing marks.
- The company must provide its personnel training about handling procedures for certified products.
- Maintain certified product records for a minimum of five years.

Percentage-Based Claims¹²

The FSC ecolabel allows percentage-based claims on products that contain less than 100 percent FSC certified raw material. Although, such a policy makes it "easier" for a product to display the FSC ecolabel, it also can potentially dilute the significance of the ecolabel. Therefore, in order to protect the integrity of the FSC ecolabel the percentage-based claim policy is quite complex. Additional complexity is added when one considers the wide range of product types, manufacturing processes, and merchandising methods.

The FSC ecolabel may be used for percentage-based claims on labels, wrapping, packaging, tags, etc. in the following cases:

- Solid wood – at least 70% of the volume of wood used in manufacturing the product line, or the collection of products, is FSC certified.
- Chip and Fiber Products – at least 17.5% by weight of the total chip or fiber used in the manufacturing the product (including wood fiber from neutral sources¹³) is FSC certified. In addition, at least 30% by weight of the new virgin wood chip or fiber used in manufacturing the product is FSC certified.
- Assembled Products made of solid wood parts – at least 70% of the volume of the timber used in manufacturing the product is FSC certified.
- Assembled products containing solid, chip, or fiber parts – Option 1 – at least 70% by volume or weight of FSC certified content. Option 2 – the rules for solid wood apply to the sum of the solid wood components and the rules for chip and fiber apply to the sum of chip and fiber based components.

The interested reader can download the full FSC percentage-based claims policy from the following URL: <http://www.fscoax.org/download/finalversion310102.pdf>

¹² Note that the FSC is in the process of revising its percentage-based claims policy and expects to phase in a new policy over the next two years.

¹³ For a complete definition of "neutral sources" see the FSC policy on percentage based claims at <http://www.fscoax.org/download/finalversion310102.pdf>

FSC Label Use Requirements



Figure 2. The Forest Stewardship Council (FSC) Ecolabel

The FSC's¹⁴ main tool for achieving its mission is a forest certification and product-labeling scheme. The program is represented to the public using the FSC ecolabel (**Figure 2**). The FSC has classified ecolabel usage into two groups – “on-product” and “off-product”. Off-product usage includes: brochures, point of sale materials, leaflets, advertising, promotions, company prospectuses, posters, and reports. On-product usage refers to labeling products or the packaging of products that came from FSC certified forests. The FSC has also classified label users into two groups – certificate holders and non-certificate holders. The term “certificate holder” applies to those who have been issued a Forest Management, COC, or joint Forest Management/COC certificate. Certificate holders can use the label either on-product or off product. Non-certificate holders fall into one of three groups: commercial users such as retailers and wholesalers; promotional users such as NGOs, FSC Members; and media and educational establishments wishing to promote the FSC. Non-certificate holders can only use the FSC label off-product. Only COC or joint forest management/COC certificate holders are allowed to use the ecolabel on-product.

Sustainable Forestry Initiative® (SFI) Program

The Sustainable Forestry Initiative® (SFI) program is a standard of sustainable forestry created in 1994 by the American Forest & Paper Association¹⁵, which is the national trade association of the forest, pulp, paper, paperboard, and wood products industry. In September 2000, an independent multi-stakeholder Sustainable Forestry Board (SFB) was established with the full responsibility of managing the AF&PA's SFI® Program Standard, verification procedures, and SFI® program compliance. All members of the AF&PA are required to conform to the SFI standard. In addition, non-AF&PA companies and landowners can participate in the SFI program as licensees. SFI program participants can choose to verify SFI compliance on their own, use a second-party verifier, i.e. another firm or trade association, or use an independent, third-party verifier. **Only those program participants wishing to use the SFI ecolabel are required to be third-party certified.**

As of November 2003, approximately 60 of the 126 SFI program participants were third-party certified. SFB accredited third-party auditors are firms such as PricewaterhouseCoopers, KPMG, and BioForest Technologies. The auditors evaluate each program participant's practices against a list of 118 “core indicators”. All indicators must be successfully met for third-party certification. Program

¹⁴ The text in this section is paraphrased from the FSC website.

¹⁵ American Forest and Paper Association (AF&PA) website: <http://www.afandpa.org>

participants that wish to promote their third-party certified status must work with the verifier to prepare an audit summary for public disclosure. The summary includes the following information:

- Audit scope and process
- Names and backgrounds of the auditors
- Indicators used
- A summary of the findings

SFI COC Requirements

The SFI certification system takes a different approach to COC than the other schemes discussed in this report. Instead of a formal and physical COC process, SFI addresses COC through third-party audits of a firm's procurement system. As part of the procurement system, a verifiable monitoring system evaluates the results of promoting reforestation and use of Best Management Practices within wood supply systems. A full documentation of SFI verification/certification principles and procedures (SFI-V/CPP) can be downloaded from the AF&PA website.¹⁶

SFI Label Use Requirements

Third-party certified SFI program participants that wish to use the SFI ecolabel apply for use of the ecolabel do so via an electronic website application. During application, program participants must be able to demonstrate their third-party certification. After demonstrating compliance, firms are classified as either *primary* or *secondary* producers and granted the use of an appropriate ecolabel for all products originating from a qualified facility. SFI refers program participants that wish to label their products to the U.S. Federal Trade Commission (FTC), for guidance on product advertising and public communication.

The American Tree Farm System (ATFS) is a program of the American Forest Foundation that targets non-industrial private landowners. Its mission is to "To promote the growing of renewable forest resources on private lands while protecting environmental benefits and increasing public understanding of all benefits of productive forestry" (ATFS, 2003). ATFS and SFI have reached a mutual agreement, which essentially recognizes that wood fiber grown under the ATFS program qualifies for inclusion in the SFI program.

¹⁶ 2002 – 2004 Edition of the SFI Program. URL: http://www.afandpa.org/Content/NavigationMenu/Environment_and_Recycling/SFI/Publications1/Current_Publications/2002-2004_SFI_Standard_and_Verification_Procedures/2002-2004_SFI_Standard_and_Verification_Procedures.pdf

To account for different types of forest operations, the SFI program has made four on-product labels available to entities that satisfy the label use guidelines¹⁷ (Figure 3). The four labels are:



Figure 3. The four SFI ecolabels.

Primary Producer – this on-product label is intended for use by any SFI participant whose manufacturing facility acquires 50% or more of its raw materials from primary sources.

Any manufacturer that uses the Primary Producers label must meet all of the following criteria:

- Primary Producers must be SFI Program Participants that are independently third party certified to the SFI Standard.
- All primary sources must be accounted for as sourced: (1) from specific forests tracts managed in conformance with the SFI Standard or other acceptable standards, or (2) through a procurement system certified to be in conformance with the SFI Standard, or (3) a combination of those two.
- The certified procurement system may include material from neutral sources, such as recovered wood fiber. No more than 2/3 (by weight) of fiber from outside the U.S. or Canada may be included and it must meet the SFI Label Use Requirements definition of other credible sources
- At least one-third (by weight) of the total wood fiber content must come from independently third-party certified sources.

Secondary Producers – There are three Secondary Producer labels, which are intended for entities sourcing greater than 50% of their material from secondary sources. Secondary producers can include manufacturers of finished forest products such as plywood, furniture, windows, magazines or catalogs, and manufacturers using market pulp.

Secondary sources are semi-finished solid wood, paper, market pulp, recovered wood fiber, or composite products obtained from a primary producer and/or a secondary producer. Certified content calculation is based upon total flow or supply

¹⁷ The text in this section is paraphrased from AF & PA’s SFI website.

of primary or secondary sources (by weight) for a single manufacturing unit using either a rolling four-quarter average, or the most recent full calendar year's consumption.

To use the secondary producer label participants must meet the following criteria:

- At least 2/3's by weight of the wood or wood fiber in the product(s) or manufacturing unit comes from independently third-party certified sources.
- Additionally, at least 1/3 (by weight) of the total wood or wood fiber content must originate from specific forest tracts independently third-party certified to be in conformance with the SFI or enrolled in the American Tree Farm System; or from a procurement system that has been independently third-party certified to be in conformance with the SFIS, or from a combination of these sources.
- Neutral sources are considered certified and may be counted in the 2/3 calculation.
- Neutral sources may not be counted in the 1/3 rule unless they originate from a forest tract third-party certified to the SFI standard or enrolled in the American Tree Farm System
- All non-U.S. or non-Canadian sources must come from forest plantations, or other well-managed forests that are harvested: (a) in compliance with generally accepted sustainable forestry practices; and (b) in a manner that does not constitute illegal logging as defined in section 5.32 of the SFI Standard.
- Secondary Producers must provide independent, third-party certified evidence documenting content to qualify to use the SFI label.

The three categories of secondary producers identified by the SFI program include:

- Participating Manufacturer - a producer of finished forest products such as plywood, furniture, windows, doors, cabinets, etc. that has been certified to the SFI Program's On-Product Label Use Requirements.
- Participating Publisher – a producer of magazines, publications, and catalogs that has been certified to the SFI Program's On-Product Label Use Requirements.
- Participating Retailer - a retailer of wood and/or paper products that has been certified to the SFI Program's On-Product Label Use Requirements.

Programme for the Endorsement of Forest Certification Schemes (PEFC)

Created in 1999, Pan European Forest Certification (PEFC) was recently renamed Programme for the Endorsement of Forest Certification Schemes¹⁸. It is a framework for the mutual recognition of credible national or regional sustainable forest management schemes. Program participants are granted the use of a common ecolabel. PEFC, a membership organization consisting of national organizations representing national forest certification schemes, assesses and endorses those schemes against the PEFC minimum requirements for credible forest certification schemes. Within the schemes, which are endorsed by the PEFC, national accreditation bodies (for example, FINAS in Finland, UKAS in the UK) accredit certification bodies, which then certify forests. Program participants are granted access to the use of the PEFC ecolabel. To date, certification schemes in thirteen European countries have been recognized by PEFC. The U.S. receives significant volumes of European wood and paper products, so the PEFC will be seen in the U.S. marketplace.

PEFC COC Requirements

PEFC COC criteria are designed to ensure that the origin of certified materials and finished products are verifiable and documented, before, during, and after manufacturing, storage, and shipping. Although the COC requirements may differ slightly from country to country, entities wishing to become PEFC COC certified must meet the technical requirements outlined in Annex four¹⁹ of PEFC's technical document:

- Two optional methods for COC verification
 - Inventory control and accounting of raw material flows (percentage methods).
 - Physical Separation and/or marking of raw material.
- Verification of origin of wood raw material and products (certified vs. non-certified status).
- Sale of products and product labeling
- Documented control system
 - Specification of person(s) responsible for control.
 - Information systems or their parts, and necessary forms, records, and documents
 - Requirements for completing information systems or their parts, and necessary forms, records, and documents.
- Record Keeping – adequate records of all procurement, processing, and sales of raw materials must be kept for at least five years.

¹⁸Programme for the Endorsement of Forest Certification schemes website: <http://www.pefc.org/>

¹⁹ The document can be downloaded from <http://www.pefc.org>

- Controversial Sources – no wood raw material from controversial sources, e.g. illegal logging, shall enter the process.

PEFC Label Use Requirements



Figure 4. PEFC ecolabel

PEFC has identified four groups of PEFC ecolabel users (**Figure 5**). They are: A) the PEFC National Governing Body, B) Forest owners and managers who hold a valid forest management certificate, C) Forest related industries that are holders of a COC certificate, and D) Organizations that are willing to promote or advertise the PEFC scheme for educational purposes only. All of these groups can use the ecolabel off-product. Examples of such uses include: 1) claim on product documents (bill of lading, packaging list, invoice, etc.), or 2) claim on general documentation (PEFC brochure, company or product brochure, etc.). The other form of ecolabel

use is on-product, however, only members of groups B and C are allowed to use the logo on-product. The minimum requirements for all on-product use of the logo are that the logo be reproduced according to the measurements colors and specifications detailed in the *PEFC Logo Reproduction Tool Kit*, the presence of the PEFC trademark, and the logo license registration number. Voluntary information that can be present on the logo includes the forest management certification, or the COC certification registration number, the name or designatory letters of the accredited certification body, the certification body’s logo, and a voluntary product description of other raw materials included in the product. Such descriptions are provided by the manufacturer

Users group \ Usage alternatives	Group A	Group B	Group C	Group D
	On-product usage	No	Yes	Yes
Off-product usage	Yes	Yes	Yes	Yes

Figure 5. Differences in PEFC Logo usage among user groups

The PEFC program allows for percentage-based claims. The minimum percentage is 70% certified wood by volume or weight. In cases where there is a percentage-based claim, the logo can include the words, “Promoting sustainable forest management”. This is in contrast to products that are made from 100% certified wood, where the logo can include the words, “From sustainably managed forests”.

Summary

The development of competing forest certification/COC/ecolabeling schemes and the complexity of their associated rules make it difficult for members of the forest industry to understand the requirements associated with the use of forest certification ecolabels. This overview was prepared to help users understand the rules associated with COC and ecolabels. The following are links to other sources of information about forest certification/COC/ecolabeling.

Other Sources of Information:

1. Canada’s National Sustainable Forest Management Standard (CAN/CSA Z809).
 - a. www.csa-international.org/product_areas/forest_products_marking/
2. Sustainable Forest Initiative (SFI)
 - a. www.afandpa.org
 - b. www.aboutsfb.org
 - c. www.aboutsfj.org
3. Forest Stewardship Council (FSC)
 - a. www.fscoax.org
 - b. www.fscus.org
 - c. www.certified-forests.org/cocc.htm
4. Programme for the Endorsement of Forest Certification schemes (PEFC)
 - a. www.pefc.org

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