



FSC Briefings

Recycled wood and fibre products

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Strengthening FSC's protocol for recycled wood and fibre products and assessing options for FSC involvement in verification of recycled claims

In this FSC Briefing, Sofia Ryder, FSC Policy and Standards Officer, explains how FSC plans to strengthen its existing systems for identifying and quantifying recycled wood and fibre in products carrying the FSC logo. FSC will also assess the desirability and options for developing an international labelling scheme for the identification of products containing independently certified recycled content. We invite comment and input from FSC Members, National Initiatives and FSC Accredited Certification Bodies.

Nearly a ton of new recycled paper can be made from a ton of recycled stock compared to the 2-3.5 tons of trees required to make a ton of virgin paper. This is one of the reasons recycled paper results in lower solid waste by-products and uses less energy, water and chemicals.

(Abromovitz & Mattoon, Paper Cuts: Recovering the Paper Landscape (Washington, DC: Worldwatch Institute 1999))

Summary

Products that contain a mixture of recycled and FSC certified material can already carry the FSC label. The requirements for this are described in the policy on percentage-based claims, which regards recycled content as being "neutral". However, FSC and its stakeholders are increasingly aware that recycled material entering the chain of custody needs to be verified as to origin, content and quantity and that current efforts to promote the use of wood from well managed forests should not conflict with efforts to encourage recycling.

In accordance with the decision of the FSC Board at the 18th Board meeting¹, and the ongoing work of the Secretariat, FSC is now seeking to:

1. Strengthen existing systems for identifying and quantifying recycled wood and fibre in products carrying the FSC logo;
2. Assess the desirability and options for developing an international labelling scheme for the identification of products containing independently certified recycled content.

¹ The board agreed that it would welcome a study of certification systems for recycled products, for endorsement by FSC, and it approved a detailed study of the implications. The board agreed that a membership vote would be needed before implementation. FSC will commission a study of certification and accreditation for recycled materials, including the advantages and disadvantages of developing a system for FSC endorsement and market claims for recycled products.

1. Background

1.1 Products carrying the FSC logo can already contain a high proportion of recycled materials

FSC already has policies in place that support the use of recycled material². The requirements for this are described in the policy on percentage-based claims, which regards recycled content as being “neutral”³.

1.2 There is scope for greater clarity in FSC’s existing definitions

FSC currently considers pre- and post consumer wood and wood fibre in its definition of recycled material. However, FSC does not make a distinction between different grades of recycled fibre, nor does it distinguish between different proportions of such grades contained in a product. This means that products claiming recycled content and carrying the FSC logo can contain unspecified amounts of, for example, pre or post consumer material. Some existing environmental claims make a clear distinction between pre and post consumer recycled inputs⁴, and hence specify a more rigorous standard than FSC currently follows.

Although the use of recycled paper material in the US continues to edge upward, accounting for about 45 % of all paper that Americans use, the use of post-consumer recycled material in printing and writing grades of paper has actually fallen since the 1990s. Market campaigns are underway to reverse this trend, and both the US Government and the AF&PA have developed targets for the increase in use of recycled fibre. However, critically, there are no agreed methodologies for the independent verification of recycled content.

Further, interest groups including some certification bodies, producers and NGOs have questioned FSC’s definitions of recycled materials⁵ and argued that recycled material entering the chain of custody needs to be verified as to origin, content and quantity.

1.3 There is no internationally accepted system for verifying recycled claims

Recycled declarations, including those accepted by FSC⁶, are largely self-proclaimed and not independently verified. There is no internationally accepted system for verifying whether material in a product is actually recycled, or according to which definition of recycled. The standard recycled mobius loop symbol is not systematically audited and is therefore not trusted by many companies and organizations⁷.

² Use of the FSC label is permitted on products containing up to 82.5% recycled content where the other 17.5% is FSC certified.

³ FSC policy on percentage based claims, May 2000

⁴ For example, in the US 30% post consumer is widely recognized as a minimum requirement as set out by the US federal government in its Executive Order 1283, 1993

⁵ Report on the Questionnaire to Assess to Impacts of the FSC Percentage Based Claims Policy, February 2002

⁶ The FSC policy on percentage-based claims, advises companies to follow the standard *ISO 14021 Environmental Labels and Declarations- Self Declared Environmental Claims* when making a claim about the content of the label.

⁷ Forest Ethics, Conservatree personal communications.

1.4 FSC needs to reduce anxieties that use of wood from well managed forests is in conflict with efforts to encourage recycling

Equally important for FSC, government policies, shifting procurement preferences and key economic decisions being made by policy makers, producers and consumers are increasing the emphasis on recycled wood and fibre products.

One high priority for the UK Government's Waste Resources Action Programme (WRAP) is to stimulate demand for recycled wood products through a marketing and education initiative. The WRAP targets by the end of 2004 are:

- 1. To double wood packaging recovery to 350,000 tonnes a year by end 2003/4."**
- 2. "To achieve 40% recycling and re-use of construction and demolition wood waste a year, an estimated additional 100,000 tonnes, to reach 480,000 tonnes."**

This trend stands only to be reinforced under the pressure of ongoing recycling campaigns and government attempts to attain sustainability targets.

In some markets, as a result, products are standing to lose their FSC labels as the percentage of recycled content increases⁸.

In others, the amount of recycled material in a product may be reduced and the amount of certified virgin material increased in order to meet the FSC labelling threshold, with some unexpected negative consequences for transport costs and recycling campaigns.

There is thus significant demand from a range of stakeholders for FSC to reduce anxieties that use of wood from well managed forests is in conflict with efforts to encourage recycling, and to demonstrate its commitment to reduce the pressure for timber production from the world's forests in addition to encouraging good management.

'Is the policy on neutral materials compatible with FSC goals? By limiting the use of recycled material, the current policy may increase logging in natural forests',

Comment provided by one respondent on neutral materials. Report on the Questionnaire to Assess the Impacts of the FSC Percentage Based Claims Policy, February 2002.

⁸ For example some manufacturers such as Nexfor and Sonnae in Europe are now exceeding 82.5% recycled content in some of their products, including chipboard sheets, and are being forced to drop their FSC labels

2. FSC's activities

As a first step, FSC is proposing to develop internationally acceptable definitions of recycled content and guidance for suppliers and buyers to identify such material in the market. FSC is also proposing to develop guidelines for certification bodies to independently verify quality and quantity of materials being fed into existing chain of custody systems.

Further, respecting the recommendations of the 18th Board meeting, FSC is undertaking a full feasibility study to evaluate its options for providing an independent accreditation service for certification of recycled wood and fibre content with the option of a new logo.

2.1 Development of internationally acceptable definitions of raw material that can be called recycled and guidance on implementation for certification bodies

FSC will develop:

- Internationally acceptable definitions of raw material that can be called recycled;
- Guidelines for certification bodies for the independent verification of quality and quantity of such materials;
- Guidelines for suppliers and buyers of such material to ensure consistent identification of these materials in the market.

By aligning FSC standards and definitions to internationally acceptable standards and providing guidance for measurement and consistent declaration of recycled content by producers and manufacturers, FSC will improve the accuracy of existing claims.

Improving existing definitions and facilitating implementation of existing requirements should be relatively simple and would not involve the introduction of another label or claim. However, this may not be enough to respond to the needs and activities of major stakeholders referred to in section 1.

2.2 A feasibility study to outline FSC's options

FSC is drawing up a feasibility study that will outline FSC's options for providing an independent accreditation service for certification of recycled content with the option of a new logo.

Expected benefits of this work include:

- Strengthened FSC systems for verifying recycled claims;
- An opportunity for FSC to extend its market presence and bring allies to FSC;
- An opportunity to demonstrate that use of wood from well managed forests is not in conflict with efforts to encourage recycling and contribute to reducing the overall demand for uncertified virgin fibre

The feasibility study will give consideration to:

- The level of demand for an international labelling scheme for recycled products;
- Options for FSC involvement in providing the service;
- Options for use of the FSC or new trademark on products containing recycled materials;
- Options for percentage labels for substantiating claims;
- Cost to FSC and potential partners;
- Legal implications (FSC internal regulations as well as wider legal implications).

FSC will review and take account of possible negative impacts of increased recycling for forest management. Whilst many stakeholders feel that the case for FSC's support of recycled material is clear and urgent, conflicting concern is raised by some producers. This is that increased use of recycled material may reduce the viability of some low margin silvicultural operations, such as early thinning. FSC will take this concern seriously and evaluate the relative costs and benefits of a change to FSC labelling policy.

Finally, FSC will not implement plans without close consultation with its members and other stakeholders, and must ensure that any such implementation is in full compliance with its internal regulations (i.e. FSC Statutes and By-laws).

2.3 Timescale

FSC will, without delay, launch a scheme to develop and test a new standard and protocols for identification and independent verification of quality and quantity of recycled materials being fed into the supply chain. This will be made available for immediate uptake by producers, manufacturers and suppliers. At the same time FSC will take the necessary steps to study and seek input on options for extending the FSC labelling policy to include up to 100% recycled content.

3. Conclusions

By developing definitions of recycled material that are consistent with international standards; developing guidance for certification bodies to verify quality and quantity of such materials being fed into existing chain of custody systems; and guidance for suppliers and buyers of such material, FSC will strengthen implementation of existing systems for identifying and quantifying recycled content. This could also provide a basis for further activities as determined by further research into FSC's options.

In the coming months, the FSC secretariat will be seeking input and comments from Members, Certification Bodies and National Initiatives on the following:

- A draft standard for recycled content for use by suppliers to identify provenance and quality of recycled material;
- Desirability and options for extending FSC's labelling policy to include up to 100% independently certified recycled content.

Comments and input should be sent to recycled@fscoax.org

FSC contact person: Sofia Ryder: sryder@fscoax.org