



February 2, 2012

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Submitted electronically to: [policy@climateactionreserve.org](mailto:policy@climateactionreserve.org)

**RE: Comments on Mexico Project Protocol, Draft for Public Review, Version 1.0**

Dear Mr. Nickerson:

These comments are submitted on behalf of the Center for Biological Diversity to the Climate Action Reserve regarding the Mexico Project Protocol, Draft for Public Review, Version 1.0 ("Mexico protocol"). I appreciate this opportunity to share my concerns regarding the Mexico protocol, and I hope these comments will contribute to the development of significant revisions in a subsequent draft of the protocol. I commend the staff of the Climate Action Reserve, the Governors' Climate and Forests Task Force, the California Air Resources Board, and other members of the Climate Action Reserve working group for the effort they have put into the development of this draft.

These comments focus on four primary concerns regarding the design and completeness of this draft of the Mexico protocol. First, the structure of the Mexico protocol does not ensure the additionality of the generated offset credits. Second, the Mexico protocol does not require full accounting of emissions associated with forest projects. Third, key elements of the Mexico protocol's methodology are not yet developed or not included in this draft for review. Fourth, the Mexico protocol fails to include specific protections for forest ecosystems. Many of these issues are also raised in detail in the comment letter submitted by the Stanford Law School Environmental Law Clinic, and those comments are included here by reference.<sup>1</sup> I request and recommend that all of these issues be addressed in revisions to the draft Mexico protocol, to be released for public review prior to finalizing the Mexico protocol.

The Mexico protocol is of particular interest because it is likely to be considered by the California Air Resources Board as a template for expansion of California's greenhouse gas cap-and-trade program to include carbon offset credits from international sources and international forest projects in particular. The Air Resources Board has already authorized the cap-and-trade rule to accept a significant volume of offset credits from international sources.<sup>2</sup> If the Air Resources Board were to adopt a version of the Mexico protocol, this protocol and the resulting offset credits could become a substantial component of the cap-and-trade program, with likely effects on the price and mixture of offset credits utilized in California. In addition, the Mexico protocol may be looked upon by either the Climate Action Reserve or the Air Resources Board as a template for additional protocols for international forest projects in other countries. As such, the Mexico protocol and successive protocols for international offset credits could significantly define and constrain the structure of other international forest offset agreements, including the United Nations Collaborative Program on Reducing Emissions from Deforestation and Forest Degradation in Developing Countries. For all these reasons, it is critical that the Mexico protocol ensures

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<sup>1</sup> Comments on the Mexico Forest Protocol, Draft for Public Review, Version 1.0, submitted January 20, 2012, by Danny Cullenward and Deborah Sivas of the Environmental Law Clinic at the Mills Legal Clinic at Stanford law School, on behalf of Dr. Michael Wara, Associate Professor, Stanford Law School.

<sup>2</sup> Sectoral offset credits, including forestry offset credits, may be used to comply with up to 2% of a covered entity's obligations during the first two compliance periods, and up to 4% in subsequent compliance periods. 17 C.C.R. § 95854. Depending on the statewide cap, this may involve as many as 71 million tons from forestry credits by 2020.

the highest quality offsets, in terms of additionality, assurances, and environmental protection, so that the resulting forest carbon offset projects do not intentionally or inadvertently result in the degradation of forest ecosystems and wildlife habitat.

### **1. The Mexico protocol design fails to ensure project additionality and would invite gaming.**

As the letter submitted by the Stanford Environmental Law Clinic describes, the design of the draft Mexico protocol raises serious programmatic concerns about project additionality. There is a substantial likelihood of adverse project selection, whereby projects on lands that would not have experienced carbon stock degradation or have low risk of future carbon stock degradation are preferentially developed as forest offset projects.<sup>3</sup> This is in large part because under the Mexico protocol, project activities are considered additional on the basis of whether they produce fewer greenhouse gas emissions than the baseline scenario, which is based on regional trends.<sup>4</sup> That is, there is no consideration given to project-level activities or incentives.<sup>5</sup> This approach provides no assurance that the activities are occurring as a result of the project, and fails to satisfy the Climate Action Reserve's additionality criterion that all protocols should set performance standards so that the "large majority" of qualifying projects are "unlikely" to have been implemented for reasons that exist independent of the protocol.<sup>6</sup>

Specifically, this would allow a landowner to develop carbon projects by simply selecting forest areas that were already surpassing the regional baseline under a business-as-usual scenario, and making no changes in management within the project area. In a refinement of this scenario, the project boundary is gerrymandered around and between forest areas where business-as-usual harvesting is planned, but the project area itself contains primarily forest areas that have little commercial value, areas that have reduced stocking levels as a result of recent harvest activities, or areas that have been slow to regenerate after harvest activities. This problem is created in part by the very broad and general definitions of the eligible management activities, and any of the above examples could potentially qualify as "[increasing] the stocking of trees on under-stocked forest areas."<sup>7</sup>

Also, because the Mexico protocol contains no requirement to determine the specific risk of leakage for each project or provisions to specifically disincentivize or discourage internal leakage (leakage within lands owned by the same landowner), a landowner would be able to game the system by simply increasing logging elsewhere to the same extent (or more) that logging is reduced within the project area.<sup>8</sup> In addition, increased levels of logging in the forest area near a project site, or increased logging in the region, would suppress the regional baseline for future

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<sup>3</sup> Under the Mexico protocol, any landowner whose existing land use plans would result in fewer emissions than the baseline scenario in his or her region would qualify for the credit, assuming the landowner either has or prepares a forest management plan for the Mexican Ministry of Environment and Natural Resources (SEMARNAT).

Climate Action Reserve, Mexico Forest Protocol, Draft for Public Review, Version 1.0 (Nov. 11, 2011) ("Mexico protocol") § 3.5.

<sup>4</sup> *Id.* § 4.2. "Project activities are considered additional to the extent they produce GHG reductions and removals in excess of those that would have occurred under a 'Business As Usual' scenario." *Id.* at 13.

<sup>5</sup> *Id.* § 9.1. The Climate Action Reserve has not yet released the trend data for each of 192 Forestry Management Units (UMAFORs), but has specified that each Forestry Management Unit will have a single baseline trend.

<sup>6</sup> Climate Action Reserve, Program Manual (Oct. 26, 2011) § 2.4.1.2.

<sup>7</sup> Mexico protocol § 2.1 "Eligible management activities include any forestry-related activity that results in a higher level of carbon stocks across the project area compared to the project's baseline. Such activities may include, but are not limited to: 1. Increasing the overall age of the forest by increasing rotation ages 2. Increasing the forest productivity by thinning diseased and suppressed trees 3. Managing competing species for improved growth and vigor 4. Increasing the stocking of trees on under-stocked forest areas 5. Removing impediments to natural forest regeneration 6. Afforestation/Reforestation 7. Increasing carbon stocks through agroforestry 8. Urban tree planting 9. Decreasing emissions from degraded forests." *Id.* at 6.

<sup>8</sup> Under the Mexico protocol, leakage risk is based on regional trends, and project-specific factors are considered only where project developers can indicate that leakage risks for the project may be lower than regional trends. *Id.* § 10.1.

projects, including projects developed by the same entity that is ramping up logging activities in the surrounding area.

Furthermore, the Mexico protocol does not appear to include any provisions that require forest projects to account for actions prior to the project start date.<sup>9</sup> The Climate Action Reserve's U.S. Forest Project Protocol ("U.S. Forest Protocol") contained some provisions that at least required disclosure of harvest inventory for the ten years prior to the start date and disqualified projects whose standing live carbon stocks have decreased over a 10-year period.<sup>10</sup> Without even these minimal requirements, a landowner would be able to harvest a forest area one year and register it as forest project the next, or create a forest project that consist largely of areas that had been intensely harvested over the past several years and were in the process of regeneration as part of business-as-usual operations. Such a scenario would not only generate non-additional credits, it would also avoid accounting for emissions associated with impacts to various carbon pools (for example, understory, litter and duff, and soil carbon) associated with the conversion of native forests to even-age management and plantation forestry.

Because the total net GHG reduction is calculated as a comparison of actual carbon stocks to the project baseline, which in turn is based on regional trends, it is not clear whether a project with decreasing forest stocks could still qualify as showing a total net GHG reduction so long as project stocks are decreasing at a rate slower than the regional trend.<sup>11</sup> If this is indeed the case, it would mean that forest areas could qualify as GHG reductions when they are actually active GHG sources; credits generated under such conditions would potentially be based largely on reductions that are neither additional nor real.

Lastly, the Mexico protocol applies both a legal requirement test and a performance test in determining the additionality of a project.<sup>12</sup> In the example provided in the Mexico protocol, the hypothetical project includes a natural protected area on 10% of the project area, in which the terms of the natural protected area prohibit harvesting.<sup>13</sup> However, because the potential loss of carbon from the project area as a whole is estimated at 45% of the project area, it is determined that "the potential loss of forest carbon is greater than the 20-year regional trend," and therefore no adjustments are made to the baseline.<sup>14</sup> This provision appears to be the only mechanism for adjusting the baseline to account for legal constraints.<sup>15</sup> However, in this example the business-as-usual growth within the natural protected area appears to be counted as growth under the project, which means that the non-additional growth in the natural protected area would be conflated with the potentially additional growth of the project as a whole.

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<sup>9</sup> "For the purposes of calculating the project's Primary Effect, actual and baseline carbon stocks prior to the start date of the project are assumed to be zero." Mexico protocol at 17 n.23.

<sup>10</sup> Climate Action Reserve U.S. Forest Project Protocol. See for example, § 5.1. "Reforestation Projects are not eligible if harvesting of live trees (standing live carbon) has occurred within the Project Area within the last 10 years." *Id.* Table 5.1 at 23.

<sup>11</sup> Mexico protocol § 7. The forest project is determined to have generated GHG reductions and/or removals only if the sum of the project's primary and secondary effects is positive. *Id.* § 7, step 7. However, the primary effect is calculated as a difference between project and the baseline. "For any given year, the Primary Effect is calculated by: a. Taking the difference between actual onsite carbon stocks for the current year and actual onsite carbon stocks for the prior year. b. Subtracting from (a) the difference between baseline onsite carbon stocks for the current year and baseline onsite carbon stocks for the prior year." *Id.* § 7, step 5.

<sup>12</sup> *Id.* § 4. "Forest Projects must satisfy the following tests to be considered additional: 1. Legal requirement test. Forest Projects must achieve GHG reductions or removals above any GHG reductions or removals that would result from compliance with any law, statute, rule, regulation or ordinance... 2. Performance test. Forest Projects must achieve GHG reductions or removals above and beyond any GHG reductions or removals that would result from engaging in "Business As Usual" activities..."

<sup>13</sup> *Id.* Table 9.2 at 43.

<sup>14</sup> *Id.* § 9.2, Table 9.2.

<sup>15</sup> *Id.* § 9.2. "To account for legal requirements in the project baseline, the regional forest carbon trend must be adjusted, where necessary, to reflect legal constraints." *Id.* at 43.

## **2. The Mexico protocol does not require full accounting of emissions associated with forest projects, including emissions from understory, lying dead wood, litter and duff, and soil carbon pools, or emissions from fuel use and the offsite combustion of forest materials.**

A number of emissions sources that are excluded from quantification in the Mexico protocol may in fact constitute substantial emissions that substantially exceed emissions from a business-as-usual baseline. Changes to the understory, lying dead wood, and litter and duff forest carbon pools are excluded in the Mexico protocol, although these carbon pools represent substantial portions of forest carbon and can be mobilized and emitted through intensive management activities such as forest clearcutting and deep-ripping of soils.<sup>16</sup> In contrast to the Mexico protocol, these emissions are included or optional under the U.S. Forest Protocol.<sup>17</sup> In fact, the U.S. Forest Protocol states that “[shrubs] and herbaceous understory may constitute a significant portion of carbon affected by Reforestation Projects on initial years, e.g. during site preparation and over the course of the project.”<sup>18</sup> Additionally, a white paper commissioned by the Climate Action Reserve indicated that lying dead wood is a substantial forest carbon pool that can result in significant emissions in response to management.<sup>19</sup> For all of these carbon pools, an increase in the extraction of forest materials for biomass energy production could result in substantial losses resulting in emissions.

Furthermore, all of these carbon pools, plus the soil carbon pool mentioned below, would be dramatically reduced and result in substantial emissions if the project includes forest lands where selection harvesting is being replaced by even-age management. In the conversion to even-age management and plantation forestry, complex forest structures with mixed age-classes and understory vegetation are eliminated, resulting in substantial emissions. Such operations are apparently eligible under the Mexico protocol; in fact, the Mexico protocol appears to invite such activities under the category of “[increasing] carbon stocks through agroforestry.”<sup>20</sup> And if the Mexico protocol does not include provisions that require forest projects to account for emissions resulting from harvest activities that occurred within several years prior to the start of the project, there is an increased likelihood that landowners will convert native forests to even-age plantations prior to the start of a project, in order to avoid accounting for emissions associated with that conversion.<sup>21</sup>

The Mexico protocol requires projects to account for impacts to the soil carbon pool only “if the project includes mechanical site preparation for the establishment of forest species or rotation forestry at intervals less than 25 years.”<sup>22</sup> Presumably, this provision is meant to acknowledge the substantial emissions associated with intensive site preparation and the extensive soil exposure associated with even-age harvesting. However, the emissions resulting from these practices occur regardless of the harvest interval. The Mexico protocol does not explain the rationale for limiting this provision only to rotation forestry at intervals less than 25 years, but one can infer that the reasoning is based on the assumption that soil carbon pools are more likely to recover under longer rotation cycles. However, even if one sets aside the problem that this does not account for the increase in the soil carbon pool that would occur if the forest were not harvested, this approach fails to consider the temporal component of carbon emissions. That is, emissions from the soil carbon pool have implications for atmospheric greenhouse gas concentrations, including irreversible environmental impacts, even if equivalent amounts (or more) of greenhouse gases are subsequently sequestered in the soil carbon pool years or decades later.<sup>23</sup>

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<sup>16</sup> *Id.* § 6, Table 6.1.

<sup>17</sup> U.S. Forest Project Protocol, § 5.1, Table 5.1.

<sup>18</sup> *Id.* at 22.

<sup>19</sup> Evans, Alexander, and M Ducey, Carbon Accounting and Management of Lying Dead Wood, prepared for the Climate Action Reserve, November 2010.

<sup>20</sup> *Id.* 2.1 at 6, list of eligible management activities.

<sup>21</sup> See paragraph regarding ten-year “look-back” in section 1 of this letter.

<sup>22</sup> Mexico protocol § 6, Table 6.1 at 17.

<sup>23</sup> Near-term GHG emissions exacerbate the risk of increasing atmospheric concentrations of greenhouse pollutants to the point where severe impacts are unavoidable—the so-called climate “tipping point.” See James Hansen, et al., *Target Atmospheric CO<sub>2</sub>: Where Should Humanity Aim?*, 2 OPEN ATMOS. SCI. J. 217 (2008). Even if emissions from soil are one day re-sequestered by the project, the greenhouse pollution emitted following

Last, combustion emissions from the production, transportation, and disposal of forest products are excluded from quantification in the Mexico protocol. The reason given for this exclusion is that “[the] Primary Effect of Forest Projects in Mexico is to conserve and increase onsite forest carbon stocks, without substantially affecting the production, transportation, and disposal of wood products with regards to baseline levels.”<sup>24</sup> This is a clear statement of the intentions behind this exemption, but there is no explanation of the extent to which this assumption is supported by data or modeling. Given that the Mexico protocol requires quantification of neither the forest carbon pools from which biomass is often extracted—lying dead wood, litter, and understory—nor the emissions resulting from the combustion of those materials, there will be no accounting for such emissions or any changes compared to baseline emissions. Similarly, an increase in the extraction of forest materials for biomass energy production could result in significant increases in mobile combustion emissions from site preparation activities and operations and maintenance, all of which are excluded from quantification under the Mexico protocol.<sup>25</sup>

### **3. Key elements of the Mexico protocol’s methodology are not yet developed or not included in this draft for review.**

A thorough review of the Mexico protocol is impossible at this time, as it is incomplete in key sections, including sections and factors that should have significant implications for the implementation and integrity of forest projects. These include, but are not limited to, the following elements:

- **Regional baselines.**<sup>26</sup> Both the regional trends that determine the regional baselines and the data from which these trends are derived are necessary for a complete review of this provision.
- **Regional leakage risk factors.**<sup>27</sup> Both the leakage risk factors and the method by which these factors are derived are necessary for a complete review of this provision.
- **Methods for deriving the reversal risk factors.**<sup>28</sup> The Mexico protocol provides no explanations or calculations behind the development of risk factors associated with land tenure risk, social risk, or governance risk. The section on management risk refers to a model developed by the Institute of National Ecology and to a webpage that is in production but does not provide the methods or calculations.<sup>29</sup> The risk factors associated with wildfire, disease or insect outbreak, and other catastrophic events refer to a UMAFOR worksheet, but do not provide the methods or calculations.<sup>30</sup>
- **Management risk factors.**<sup>31</sup> The Mexico protocol includes an assessment of “management risk,” which would be provided by a model developed by the Mexican Institute of National Ecology, but does not provide these numbers or an explanation of what they represent above and beyond the regional leakage risk factors.
- **A model Project Implementation Agreement.**<sup>32</sup> These details are extremely important for evaluating the enforceability of the contract with various landowner categories, especially considering the limitations

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harvest have significant impacts on the climate in the interim; they exert a warming effect on the climate and contribute to the total cumulative accumulation of GHGs in the atmosphere that contribute to our success or failure in heading off the worst impacts of climate change.

<sup>24</sup> Mexico protocol § 6, Table 6.1 at 21.

<sup>25</sup> *Id.* § 6, Table 6.1 at 19.

<sup>26</sup> *Id.* § 9.1.1; *Id.* at Appendix B.

<sup>27</sup> *Id.* § 10.1; *see* Worksheet 10.1.

<sup>28</sup> *Id.* § 11.2.4.1, at 52-55.

<sup>29</sup> *Id.* § 11.2.4.1.2 at 54.

<sup>30</sup> *Id.* § 11.2.5.2 at 57.

<sup>31</sup> *Id.* § 11.2.4.1.2.

<sup>32</sup> *Id.* § 3.11.

in the legal capacity for *ejidos* to enter into contracts longer than 30 years, and complications that may arise from title issues for *ejidos*, which contain 80% of Mexican forests.<sup>33</sup>

• **Default Carbon Estimates for Certain Strata.** The Protocol will assign certain strata default carbon estimates from a reference file.<sup>34</sup> This file is not included in the draft Protocol. Because these default estimates are not evaluated at the programmatic level for statistical accuracy across projects,<sup>35</sup> it is especially important that they be disclosed for public review and comment prior to Protocol approval.

#### 4. The Mexico protocol fails to include adequate environmental protections for forest ecosystems.

The Mexico protocol does not include even the minimal environmental protections provided in the Climate Action Reserve's U.S. Forest Protocol. Such provisions are necessary to provide a basic minimum level of protection from adverse and unintended environmental impacts on forest ecosystems, wildlife habitat, and ecosystem services. The lack of specific environmental standards may be particularly important in the Mexico protocol, in which eligible management activities explicitly include "thinning diseased and suppressed trees," "removing impediments to regeneration," and "increasing carbon stocks through agroforestry," activities that are undefined in the Mexico protocol.<sup>36</sup> These terms are very broadly defined by the timber industry, can be easily misrepresented by landowners, and can result in substantial negative environmental impacts.

Instead of setting minimum environmental standards for forest projects, the Mexico protocol relies on certification by the Climate, Community, and Biodiversity Alliance ("CCBA") or Forest Stewardship Council-Mexico ("FSC-Mexico").<sup>37</sup> The Mexico protocol states that these certification processes can ensure compliance with the "Cancun Agreements."<sup>38</sup> However, the Cancun Agreements are largely aspirational and do not include specific standards. In fact, the most direct statement in the Cancun Agreements regarding the protection of environmental values is the commitment that projects are "consistent with the conservation of natural forests and biological diversity."<sup>39</sup> Given the generality of the Cancun Agreements, it is difficult to say whether certification by CCBA or FSC-Mexico upholds the intentions of the Cancun Agreements.

Putting aside the unclear connections to the Cancun Agreements, certification by CCBA or FSC-Mexico does not provide even the minimal protections included in the U.S. Forest Protocol. For example, the U.S. Forest Protocol requires that projects consist of at least 95% native species and that no more than 40 percent of the forested acres consist of trees less than 20 years old.<sup>40</sup> The U.S. Forest protocol also contains the requirement that projects "promote and maintain native forests comprised of multiple ages and mixed native species with in the Project Area and at multiple landscape scales."<sup>41</sup> (Unfortunately, this requirement is largely negated by the specific evaluation criteria associated with this requirement.)<sup>42</sup>

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<sup>33</sup> *Id.* § 11.2.4.1.1; *see* Table 11.1.

<sup>34</sup> *Id.* § 8.2.

<sup>35</sup> *Id.* § 8.2.2.

<sup>36</sup> *Id.* § 2.1 at 6.

<sup>37</sup> *Id.* § 3.7 at 9-10.

<sup>38</sup> *Id.* § 3.7 at 10.

<sup>39</sup> Conference of the Parties XVI in Cancun (2010), guidelines provided at *Id.* § 3.7 at 10.

<sup>40</sup> U.S. Forest Protocol § 3.10.2, Table 3.2.

<sup>41</sup> *Id.* § 3.10.2 at 14.

<sup>42</sup> *Id.* § 3.10.2, Table 3.2 at 15. The evaluation criteria for native species composition and age distribution require only that no single species component exceeds the average for the assessment area, and allows the landowner to request a variance; and the existence of a state-sanctioned management plan is accepted as assurance of age-class diversity.

In contrast, the most specific comparable requirement in the CCB is that the project “must generate net positive impacts on biodiversity within the project zone and within the project lifetime.”<sup>43</sup> Similarly, the most specific comparable requirement in the FSC standards is that: “[ecological] functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession; b) Genetic, species, and ecosystem diversity; c) Natural cycles that affect the productivity of the forest ecosystem.”<sup>44</sup> The values expressed in these documents do not translate into specific quantitative standards that provide meaningful protections for environmental criteria at the project level. Furthermore, it is difficult to see that any provisions in the Mexico protocol prohibit or discourage the conversion of natural forests—with mixed species and multi-age structures—to even-age plantations of single species or much simpler structures. Baseline environmental standards explicitly defined in the Mexico protocol are needed in order to provide a basic minimum level of protection from adverse and unintended environmental impacts on forest ecosystems, wildlife habitat, and ecosystem services, as well as provide some consistency across the participating projects.

## Conclusion

I appreciate the opportunity to comment on the Mexico protocol and look forward to working with the Climate Action Reserve to strengthen the Mexico protocol in subsequent iterations. I hope these comments contribute to the efforts to revise the Mexico protocol in future drafts. Given the nature of these issues and the need for substantive revisions, I respectfully ask the Reserve to offer an opportunity for public review of a revised complete draft Mexico protocol, prior to seeking Reserve Board approval.

Sincerely,



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<sup>43</sup> CCBA § B1 at 28. “The project must generate net positive impacts on biodiversity within the project zone and within the project lifetime, measured against the baseline conditions. The project should maintain or enhance any High Conservation Values (identified in G1) present in the project zone that are of importance in conserving globally, regionally or nationally significant biodiversity. Invasive species populations must not increase as a result of the project, either through direct use or indirectly as a result of project activities. Projects may not use genetically modified organisms (GMOs) to generate GHG emissions reductions or removals. GMOs raise unresolved ethical, scientific and socio-economic issues. For example, some GMO attributes may result in invasive genes or species.” The section more specifically requires monitoring and evaluation: “Use appropriate methodologies to estimate changes in biodiversity as a result of the project in the project zone and in the project lifetime. This estimate must be based on clearly defined and defensible assumptions. The ‘with project’ scenario should then be compared with the baseline ‘without project’ biodiversity scenario completed in G2. The difference (i.e., the net biodiversity benefit) must be positive.” *Id.* § B1 at 28. However, the referenced “biodiversity scenario in G2” refers only to general and large-scale characteristics: “Describe how the ‘without project’ reference scenario would affect biodiversity in the project zone (e.g., habitat availability, landscape connectivity and threatened species).” *Id.* § G2 at 15.

<sup>44</sup> FSC international standards at 6. FSC-STD-01-001 V4-0 EN FSC Principles and Criteria for Forest Stewardship. The FSC-Mexico standards are apparently available online only in Spanish, so I instead referred to the FSC international standards available at [www.fsc.org](http://www.fsc.org).