



Designation: D7612 – 21

# Standard Practice for Categorizing Wood and Wood-Based Products According to Their Fiber Sources<sup>1</sup>

This standard is issued under the fixed designation D7612; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reapproval. A superscript epsilon ( $\epsilon$ ) indicates an editorial change since the last revision or reapproval.

## 1. Scope

1.1 This practice sets forth minimum criteria and evaluation requirements for products employing the use of different systems to trace wood fiber to sources operating under different forest management or forest certification systems.

1.2 The purpose of this practice is to provide wood products manufacturers, distributors, and retailers with a system to provide clear, objective information to communicate to consumers regarding product conformance to different wood fiber tracing systems within specific forest management or forest certification programs. It provides a structure that segregates the different types of labels and tracing systems in use among major forest certification standards and other voluntary and regulatory standards governing the production of forest products.

NOTE 1—The principles in this practice apply internationally, provided that the required information is available to support categorization. For example, products certified to the globally recognized forest certification standards will meet the “Certified Sources” category regardless of their origin, and documented risk assessments (noted in Appendix X5) provide the basis upon which raw materials sourced from Canada and the United States can be deemed to meet the “Legal Sources” category. To categorize raw materials sourced outside of Canada and the United States as “Legal Sources,” it is recommended that the adopting entity develop supplemental provisions to address country-specific issues as needed.

1.2.1 This practice provides an objective basis to differentiate among:

1.2.1.1 Non-controversial (that is, legal) sources of forest products,

1.2.1.2 Responsible sources of forest products (that is, non-controversial sources together with certified procurement systems or from forests managed using responsible practices), and

1.2.1.3 Certified sources of forest products (that is, non-controversial sources together with certified chain of custody).

1.2.2 This practice is intended to provide a framework to help wood product vendors identify the competent and reliable

evidence needed to substantiate product claims as required by the U.S. Federal Trade Commission’s Guides for the Use of Environmental Marketing Claims (also known as “The Green Guides”).

1.2.3 Products from unknown sources are not covered by this practice.

1.2.4 This practice is intended for voluntary use by manufacturers, distributors, retailers, consumers, and standards developers in the wood products sector.

1.3 The category structure of this practice is derived from publicly available sources or based on the provisions of various forest management or forest certification standards. Documentation of compliance with specific category requirements is the responsibility of the user. The objective of this categorization is to provide a concise and easily communicated description based on grouping of significant practices. It is possible that this grouping will result in some consolidation of concepts and practices of individual programs. Details of these practices or categorization of products complying with more than one program are beyond the scope of this practice.

1.4 *This standard does not purport to address all of the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety, health, and environmental practices and determine the applicability of regulatory limitations prior to use.*

1.5 *This international standard was developed in accordance with internationally recognized principles on standardization established in the Decision on Principles for the Development of International Standards, Guides and Recommendations issued by the World Trade Organization Technical Barriers to Trade (TBT) Committee.*

## 2. Referenced Documents

2.1 *ASTM Standards:*<sup>2</sup>

D9 Terminology Relating to Wood and Wood-Based Products

D7480 Guide for Evaluating the Attributes of a Forest Management Plan

<sup>1</sup> This practice is under the jurisdiction of ASTM Committee D07 on Wood and is the direct responsibility of Subcommittee D07.08 on Forests.

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<sup>2</sup> For referenced ASTM standards, visit the ASTM website, www.astm.org, or contact ASTM Customer Service at service@astm.org. For *Annual Book of ASTM Standards* volume information, refer to the standard’s Document Summary page on the ASTM website.

## 2.2 Other References:

FAO Global Forest Resources Assessment 2005, Annex 2  
 Federal Trade Commission, Commercial Practices, Chapter I, Subchapter B; Guides and Trade Practice Rules, Part 260—Guides for the Use of Environmental Marketing Claims  
 International Finance Corporation Indigenous Peoples, Guidance Note 7<sup>3</sup>  
 PEFC Technical Document: 2005  
 Standards Development Organization Advancement Act of 2004, Pub. L. No. 108–237, Section 102(5) (2004)  
 U.S. Customs and Border Patrol discussion of the Lacey Act ([www.cbp.gov](http://www.cbp.gov))  
 USDA Forest Service, NRS-INF-06-08, “Who Owns America’s Forests,” 2008

## 3. Terminology

3.1 *Definitions*—For definitions of general terms used in this practice related to wood, refer to Terminology **D9**, and for terms related to forestry, forest certification, and traceability, refer to Guide **D7480**.

### 3.2 Definitions of Terms Specific to This Standard:

3.2.1 *chain of custody (COC), n*—a system of procedures and documentation that tracks the custodianship of forestry materials or wood-based products through one or more stages of its life cycle from the forest to the end-use. See **X1.7** for a discussion of COC under forest certification standards.

3.2.1.1 *Discussion*—Once a product receives a permanent label (such as a gradestamp) and is not subsequently remanufactured, this practice accepts the on-product label as proof of chain of custody.

3.2.2 *consensus-based programs/standards, n*—programs/standards developed using the principles of openness, balance, transparency, consensus decision-making, and due process.<sup>4</sup>

3.2.3 *non-controversial sources, n*—sources that do not come from illegal or unauthorized harvesting.

3.2.3.1 *Discussion*—Examples of illegal or unauthorized harvesting include harvesting in forest areas protected by law as well as in forest areas officially published by government authorities (or the body with the legal authority to do so) as planned to become strictly protected by law, without the government authorities (or the body with the legal authority to do so) giving permission to harvest.

3.2.3.2 *Discussion*—Source is Annex 4 PEFC Technical Document: 2005, 1.3.4 *controversial sources*, modified by establishing the contradictory concept “*non-controversial sources*” with a negation of the essential characteristics of the definition of *controversial sources*.

3.2.4 *procurement system, n*—a system requiring organizations buying raw materials to have an auditable procurement process designed, at a minimum, to require compliance with

best management practices to protect water quality on all suppliers’ lands and ensure all fiber comes from known and legal sources.

## 4. Summary of Practice

4.1 This practice describes a category-based method for evaluating broad differences between forest management standards. The rationale underlying the categories is provided in **Appendix X2**.

4.2 In providing rules for undertaking an evaluation of different forest management standards, this practice (1) establishes three broad categories to distinguish between programs with different levels of tracing and documentation, and (2) eliminates from consideration any products from unknown sources.

NOTE 2—The standard also provides a conceptual basis to describe the category of protective forestry sources. Since this is conceptual and requires the development of an underlying database, it is included within **Appendix X3** and **Appendix X4** for information only.

4.3 This practice is guided by the following principles:

4.3.1 Its use is intended to promote the growth of responsible forest management.

4.3.2 Any marketing claims based on or related to this practice are accurate, verifiable, relevant and not misleading.

4.3.2.1 Any marketing claims based on or related to this practice are in compliance with the Federal Trade Commission’s Guides for the Use of Environmental Marketing Claims and other U.S. consumer protection laws.

4.3.3 In the categories, differences in system governance that are legally relevant to federal and state or provincial government agencies are addressed specifically as to whether they are governed through consensus-based processes.

4.3.4 Decisions based on the categories avoid restraining trade; that is, they enable consumer choice among products produced under comparable conditions.

4.4 It is possible that the differentiation between various forest practices, regulatory and certification-type systems will require in-depth examination beyond the scope of this practice. This practice does not rank, rate, or differentiate among the efficacy of these systems for either forest practice or application to specific forest products. Such a differentiation requires detailed information specifically focused on the intended end-use. See **Appendix X5** for links to aid users who require more detailed differentiation.

## 5. Significance and Use

5.1 Voluntary forest certification systems have become an important factor in promoting sustainable forest management. The standards in use are highly variable, however. Even within a family of standards with a common label there is the potential for wide variations in practices. This prevents producers and consumers from using a certification label to characterize products according to a specific set of qualities or values. This practice creates a framework to differentiate products based on a set of qualities and values identified as important in the market for wood products.

<sup>3</sup> Available from International Finance Corporation (IFC), 2121 Pennsylvania Avenue, NW Washington, DC 20433, <http://www.ifc.org>.

<sup>4</sup> From the Standards Development Organization Advancement Act of 2004, Pub. L. No. 108–237, Section 102(5) (2004). This definition is similar to those found in various ASTM documents.

**TABLE 1 Summary of Criteria for Categorizing Products with Fiber Procurement Systems Conforming to Different Forest Certification or Management Standards**

Requirements	Products from		
	Legal Sources	Responsible Sources	Certified Sources
A) Fiber is from jurisdictions with a low risk of illegal activity or from controlled wood standards, stair-step standards, legality assessments, or other proprietary standards	A	A	A
System governance: B) Public legislative or regulatory processes; C) Proprietary Standards; D) Consensus-based	B or C	B or C or D	D
Content: E) Requires compliance with best management practices to protect water quality and ensures all fiber comes from known and legal sources F) Provides for Forest Management Plans in substantial compliance with relevant portions of Guide D7480 – 08 or equivalent	—	E or F	F <sup>A</sup>
Documentation includes traceability: G) To the applicable jurisdiction H) By a certified procurement system I) By a chain of custody system <sup>B</sup>	G	G or H or I	I

<sup>A</sup> See Appendix X3 for discussion of additional concepts related to sub-categorization of certified sources.

<sup>B</sup> For the purposes of categorizing products under this practice, distributors and retailers can rely on “on-product” labels for chain of custody or a certified procurement system if they are not engaged in significant value-added processing or remanufacture. In lieu of an on-product label, a certificate of compliance indicating conformance with the applicable chain of custody or certified procurement system is permitted.

5.2 This practice is intended to be used by producers, distributors, retailers, or consumers who wish to understand where a product fits within three categories. At a minimum, the user will need to know the geographic origin of the wood going into a product and whether it is labeled or otherwise certified to a procurement system or chain of custody based on a voluntary forest management or certification standard. Producers who want to use this practice must be able to identify the geographic origin of the wood to at least the level needed to support the claims to consumers associated with a given category and described in 6.1.

## 6. Criteria

6.1 The criteria differentiating wood products into three categories based on the wood fiber tracing systems, forest certification and other standards that apply to their production are provided in this section and are summarized in Table 1.

6.1.1 *Non-Controversial (That is, Legal) Sources of Forest Products:*

6.1.1.1 Products from non-controversial (that is, legal) sources are produced with wood fiber from jurisdictions with a low risk of illegal activity or from controlled wood standards, stair-step standards, legality assessments, or other proprietary standards. Products from non-controversial sources shall be traceable to the applicable jurisdiction, or chain of custody.

6.1.2 *Responsible Sources of Forest Products:*

6.1.2.1 Products from responsible sources are produced with wood fiber acquired according to an independently

certified procurement standard or are from a proprietary forestry standard or from jurisdictions with regulatory or quasi-regulatory programs to implement best management practices. These standards or programs are typically consensus-based proprietary certification standards or public legislative and regulatory processes. To qualify for this category, the applicable standard or forest governance in the applicable geography shall document a system designed to require compliance with best management practices to protect water quality and ensure all fiber comes from known and legal sources.

6.1.3 *Certified Sources of Forest Products:*

6.1.3.1 Products from certified sources are produced with wood fiber acquired in accordance with, and independently certified to, an internationally recognized voluntary forest certification standard or equivalent. See Appendix X1 for discussion of globally recognized programs that satisfy the requirements of this practice.

6.1.3.2 Equivalent standards, where used, shall document substantial compliance with and effective implementation of applicable portions of the Sustainable Forest Management provisions of Guide D7480 and shall be verified by an accredited independent third party.

## 7. Keywords

7.1 certified sources; fiber procurement system; forests; forest certification; forest management; legal sources; protective forestry sources; responsible sources

APPENDIXES

(Nonmandatory Information)

**X1. BACKGROUND DISCUSSION OF FOREST MANAGEMENT AND PROMINENT FOREST CERTIFICATION PROGRAMS**

X1.1 In North America, professional foresters have traditionally been the leaders in developing and improving forest management practices. Conversely, best forest management practices are not always followed in some regions of the world. In some regions, illegal logging and other undesirable practices are not uncommon. In an attempt to curb these practices, governmental and non-governmental organizations have developed regulatory requirements and certification programs that delineate sustainable forest management practices.

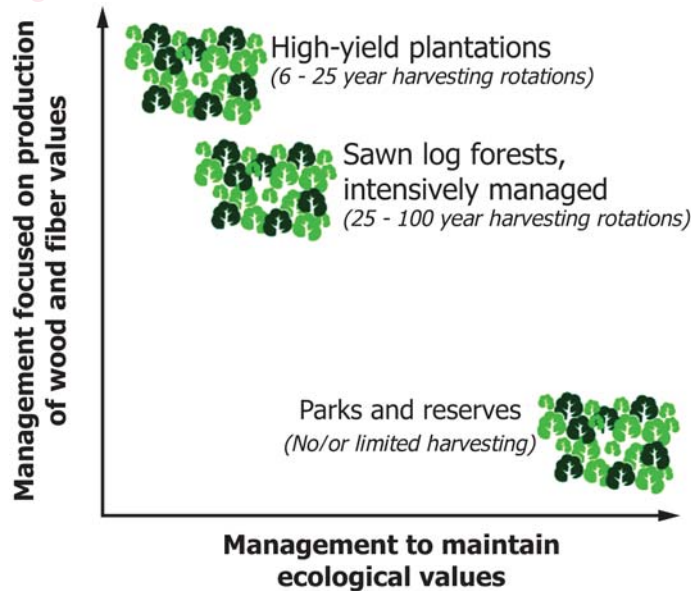
X1.2 After basic issues of legal and responsible sourcing are addressed, forest management and certification programs must address the philosophical question regarding their bias toward production forestry or protection forestry. As illustrated in Fig. X1.1 (reprinted with permission from World Resources Institute), forests can be managed across a broad spectrum of philosophies—from high-yield “crop style” plantations at one extreme to parks and preserves at the other.

X1.3 Organizations promulgating the most prominent forest certification programs throughout the world are the American Tree Farm System (ATFS) ([www.treefarmssystem.org](http://www.treefarmssystem.org)), the Canadian Standards Association Sustainable Forest Management Standard Z-809 (CSA-SFM) ([www.csasfmforests.ca](http://www.csasfmforests.ca)), the Forest Stewardship Council (FSC) ([www.fsc.org](http://www.fsc.org)), the Programme for the Endorsement of Forest Certification schemes (PEFC) ([www.pefc.org](http://www.pefc.org)), and the Sustainable Forestry Initiative (SFI) ([www.sfi-program.org](http://www.sfi-program.org)).

X1.4 Forest certification and forest management programs continue to evolve. X4.2.1.1 and X4.2.1.2 are intended to ensure that claims related to compliance with this practice are based only on standards that are officially approved by their promulgators (that is, not “draft” or “interim” standards) and that their limits of geographic applicability are clearly defined. X4.2.1.3 provides for compliance with well-accepted methods of sustainable forest management. X4.2.3 requires that any program claiming compliance with protective forestry practices provide evidence and documentation of that claim.

X1.5 Although these forest certification programs are growing, certified acreage worldwide is still a relatively small fraction of total forest acreage (Fig. X1.2).

X1.6 Some issues related to forest management and certification in the United States are somewhat different than in other countries. In some countries, such as Canada, the forest resource is predominantly government-owned. In other countries, such as Brazil, most commercially managed forest acreage is owned by corporations. In the United States, nearly one-fourth of forest acreage is owned by millions of small producers (so-called “family forest owners”), approximately one-third is owned by the federal government, one-third owned by large (that is, “corporate”) producers, and the remaining portion (roughly one-tenth) owned by state and local governments (Fig. X1.3). Each of these diverse ownership types operates within a variety of regulatory frameworks and chooses



NOTE 1—Reprinted with permission from World Resources Institute.

NOTE 2—From “Sustainable Procurement of Wood and Paper-Based Products,” World Resources Institute, 2009 ([http://pdf.wri.org/sustainable\\_procurement\\_guide.pdf](http://pdf.wri.org/sustainable_procurement_guide.pdf)).

**FIG. X1.1 Differentiation of Forest Management Practices**

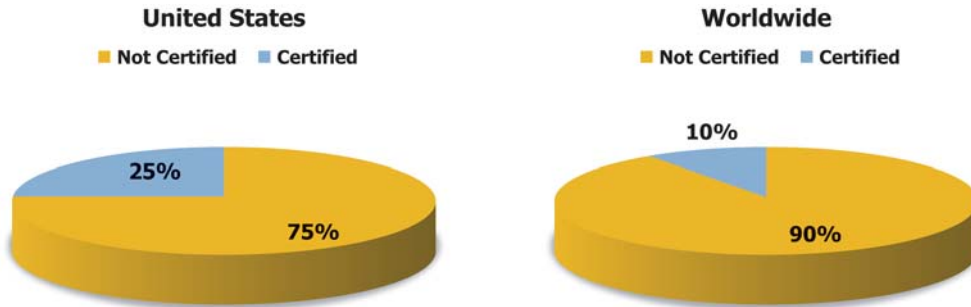
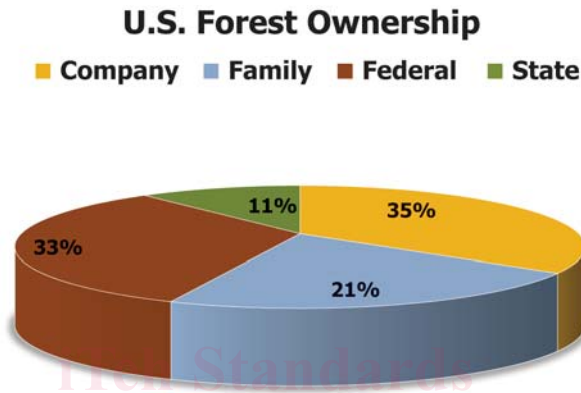


FIG. X1.2 Forest Certification is Still a Small Fraction of Total Forest Acreage (data from ATFS, FSC, PEFC, SFI (2008))



10 million family-forest owners (USDA-FS, 2008)

FIG. X1.3 U.S. Forest Ownership Patterns are Distinctly Different from Other Countries (data from USDA Forest Service; USDA Forest Service, NRS-INF-06-08, “Who Owns America’s Forests,” 2008)

forest certification and other management programs to meet its own forest management needs.

X1.7 In forest certification, chain of custody allows companies to make claims about how much of the fiber in their product or product line comes from certified forests and how much fiber comes from other acceptable sources. COC is third-party audited in accordance with the forest certification programs. All of the globally recognized forest certification standards commonly allow the use of credits for the volume of raw material obtained from a certified forest to be allocated to a proportionate volume of product during a specified time period (known as a “volume credit method” of accounting). Thus, with the exception of specific labels signifying actual certified content, COC in forest products does not mean a certified product can be traced to a specific certified forest or

even that the product necessarily contains any content from a certified forest. COC claims should be accompanied with accurate claims about uncertified content, that is, whether it comes from non-controversial sources, responsible sources, or both. Given these limits on COC as applied in forest certification, a product categorized under this practice as coming from certified sources does not necessarily come from better managed forests than a product categorized as coming from responsible sources. Depending on the amount of wood available from certified sources in a supply chain, a given product may be far more likely to come from non-certified than from certified sources. Thus users of this practice must be cautious that any claims they make comparing certified to responsible sources are properly substantiated for a specific product line.

## X2. EVALUATION SYSTEM METHODOLOGY

X2.1 A discussion of the rationale underlying the categories in [Table 1](#) is provided herein.

X2.2 The minimum level of documentation permitted by this practice provides reasonable assurance that the material for the product was not sourced illegally and originates from otherwise non-controversial sources. Forest certification programs provide extensive requirements related to this topic. Additionally, the 2008 amendments to the Lacey Act provide additional documentation requirements in this area.

X2.3 The Lacey Act, as amended in 2008, expands its scope to cover forest products. Section 8204 is titled “Prevention of Illegal Logging Practices.” As described on the CBP website, “The Act extends the statute’s reach to include a broader range of plants and plant products, including timber deriving from illegally harvested plants. Illegal logging robs countries, destroys forests, and competes with the legal production and trade. This Act provides the legal authority to take action when products stemming from the practice of illegal logging enter the United States.” Declaration forms are required for all forest products imported into the United States that specify the country of origin or, if it cannot be specified, then all potential countries of origin. If the country of origin is known, then references are available to identify jurisdictions at low risk of providing products from illegal sources. See [Appendix X5](#) for links to additional information.

X2.4 In addition to products traceable to jurisdictions with a low risk of illegal activity, these criteria can be met by products verified or certified to credible proprietary standards providing for legality assessments, stair-step approaches to certification, and controlled wood, such as FSC’s Controlled Wood Standard, those of the Global Forest and Trade Network and the Tropical Forest Trust, or equivalent.

X2.5 Additional documentation is required for products complying with the responsible sources requirements of this practice. Documentation of compliance is satisfied if products are independently certified as acquired in accordance with a voluntary procurement standard or conform to a proprietary forestry standard. Additionally, compliance is satisfied if the raw material in products is traceable to jurisdictions with regulatory or quasi-regulatory programs to implement forestry best management practices. A variety of such programs is in place in the United States and Canada.<sup>5</sup> They include state and provincial law, as well as laws governing the management of federal forest land, state or provincial forest land, and provin-

cial license requirements. At this point information is not sufficient to qualify jurisdictions outside of the United States and Canada.

X2.5.1 The required documentation depends on which agency oversees compliance; that is, through a “top-down” or “bottom-up” approach. The “top-down” approach is where enforcement is primarily through regulation and corresponding punishment for non-compliance; typically, through a public agency overseeing public lands and an independent third-party chain of custody program that verifies manufacturer traceability of fiber sources. The “bottom-up” approach is where the manufacturer supports forestry best management practices and fiber sourcing by conforming to a proprietary forestry standard, such as the SFI Fiber Sourcing standard

Those jurisdictions under regulatory or quasi-regulatory programs that enforce forestry best management practices can use either a “top-down” or “bottom-up” approach. Those jurisdictions with non-regulatory programs or limited enforcement are limited to the “bottom-up” approach. The use of either approach adds oversight during the extraction process to protect water quality on forestlands while ensuring that a manufacturer can adequately trace fiber such that it is procured from known and legal sources.

NOTE X2.1—The National Association of State Foresters has evaluated jurisdictions to determine whether their forestry best management practices are regulatory, quasi-regulatory or non-regulatory.

X2.5.2 Third-party certification of jurisdictions under regulatory or quasi-regulatory programs that enforce forestry best management practices has documented six essential features that demonstrate adequate enforcement using the “top-down” approach:

X2.5.2.1 There is a public legislative or regulatory process that requires compliance with forestry best management practices and punishes non-compliance. The forestry best management practices include, but are not limited to, protecting water quality.

X2.5.2.2 The jurisdiction has been given legal authority to enforce best management practices.

X2.5.2.3 There is sufficient funding/staffing within the jurisdiction to adequately oversee and enforce compliance.

X2.5.2.4 The jurisdiction can demonstrate proof of enforcement.

X2.5.2.5 The jurisdiction can prove there is an adaptive management strategy to allow for continued revisions to the best management practices, monitoring and compliance.

X2.5.2.6 The jurisdiction works with industry to provide a means to trace forest materials through an independent chain of custody program.

X2.6 Documentation of compliance with the certified sources level is satisfied in accordance with the requirements of recognized forest certification systems. These systems comply with the major worldwide guidelines in this area (for example, Montreal Process). Examples include ATFS, CSA, FSC, PEFC, and SFI certification, all using chain of custody.

<sup>5</sup> See National Council for Air and Stream Improvement, Compendium of Forestry Best Management Practices for Controlling Nonpoint Source Pollution in North America, Technical Bulletin No. 966, September 2009. In a regulatory program the law provides legal sanctions for non-compliance. A “quasi-regulatory” program may not impose direct legal sanctions, but state law has defined explicitly legal implications for non-compliance. See also C. McDermott, B. Cashore, and P. Kanowski, Global Environmental Forest Policies: An International Comparison, August 2009.

### X3. CONCEPTUAL DISCUSSION OF PROTECTIVE FORESTRY PRACTICES

X3.1 As part of the goal of simplifying the categorization of forest products based on differences in the standards or practices used in their fiber procurement system, the subcommittee discussed various levels of refinement. In response to questions from consumers and confusion within some standards development groups, the three proposed categories were developed. These categories answered the most common questions. This practice covers only products using fiber from known sources and legal sources. It provides differentiation for sources meeting common definitions of responsible practices and for sources that meet the requirements of certification programs. In its development phase, this practice also provided differentiation for another category that extended the concepts of certification. This category, which differentiated products using fiber from so-called protective forestry sources, attempted to address programs that are limited in product availability due to their unusually restrictive provisions. Because full implementation of this concept requires compilation of data that are not yet available, this category is not included in the mandatory portions of this practice. This nonmandatory appendix includes this concept as proposed by the subcommittee. As other portions of this practice achieve adoption by various user groups, the subcommittee will assess whether or not this concept should be balloted for adoption in the body of the standard.

X3.2 Documentation of compliance with the certified protective forestry level requires additional evidence that either the program as applied in a given forest certification region or a certified forest management unit within a given forest certification region meets the requirements described in Appendix X4. This documentation can thus be provided at the level of a certification standard, if the standard applies to family and community forest owners or the market uptake of the standard in a forest certification region is less than 20 % and the standard does not permit the use of the certain forest

practices as described in Section X4.4. More commonly, however, the documentation will be provided by a forest manager showing the requirements are met on a specific, certified forest.

X3.3 Products will qualify for the protective forestry category only if the products (or an equivalent volume of raw material, if the volume credit method of chain of custody is in use) are traceable through chain of custody to a qualifying voluntary forest certification standard or specific, certified forest. Regulatory systems will not qualify.

X3.4 The market uptake path is a conceptual extension of a framework to differentiate products based on certain qualities, applied in some cases to environmental attributes. Consumers Union<sup>6</sup> has proposed that a common feature of many markets is a correlation between marketplace capture or adoption and added consumer value. The relative scarcity of products with one set of qualities may justify higher prices by consumers. On the other hand, widespread adoption by manufacturers of another set of qualities may translate over into environmental benefits without an increase in costs to consumers. In the context of forest products this practice provides a basis to communicate clearly and objectively about both cases.

X3.5 The evaluation of market uptake will be verified through independent research. The evaluation is straightforward.

X3.6 The geographic boundaries are those described in Section X4.5. These roughly correspond to those already in place from the Forest Stewardship Council. They consist primarily of national boundaries. Within some large countries

<sup>6</sup> Adapted from a presentation by Urvashi Rangan, Consumers Union, at the ANSI Legal Issues Forum 2009, Bethesda, MD.

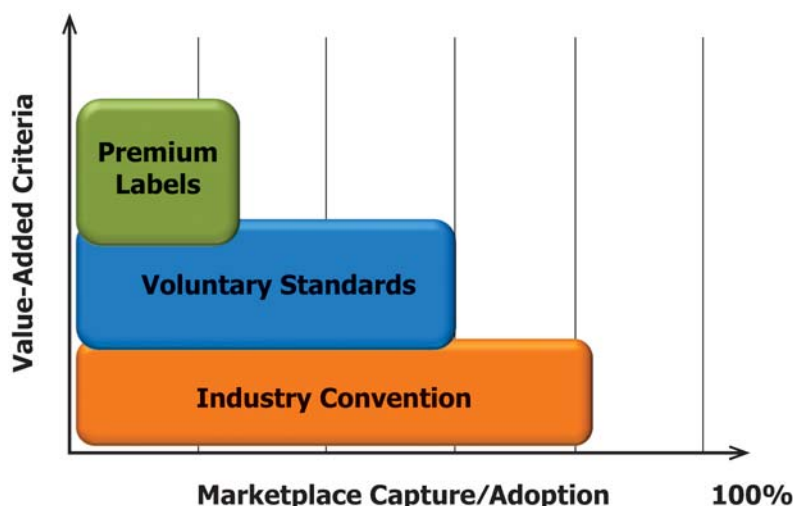


FIG. X3.1 Marketplace Capture/Adoption is Correlated with Value-added Features (adapted from Consumers Union, 2009)