Key Details of the Appalachian Woodlands Alliance Smallholder Access Program

**The Smallholder Access Program (SAP) is designed to accommodate the realities of landowners of less than 100 hectares.**

The Smallholder Access Program (SAP) is designed to allow very small landowners access to FSC market benefits and incentive for improving forest management, while maintaining the integrity of FSC claims and responsible forest management.

The central components of the program include a point of harvest verification of key requirements combined with a regional assessment and LOW RISK conclusion of other FSC Criteria. The critical indicators are derived from a risk-based analysis of the FSC Principles & Criteria, considering the project geographic area, environmental and social context, applicable ownership sizes, and forest management types.

The AWA is requesting that FSC consider a pilot for the SAP in the southern and central Appalachian Region of the United States, on naturally regenerating hardwood forests of private ownerships less than 100 hectares.
**B | It works similarly to the FM Group Certification model.**

The structure and implementation of the SAP is very similar to the existing forest management group certification model. The SAP manager (similar to the group manager) would be required to develop and implement the capacity to verify that sites in the program conform to the modified FSC requirements, track materials from verified sites, and monitor conditions to ensure system integrity.

The certificate holder’s system and internal auditing would be audited by an approved third-party auditing body on an annual basis.

**Example 1.** A manufacturer that holds a Chain of Custody certificate can have a SAP certificate as well. The company’s procurement foresters purchase stumpage (standing timber) from a qualifying landowner. The manager of the SAP certificate would designate a trained internal auditor to inspect each smallholder parcel to determine conformance with the system requirements. Materials from approved and verified tracts carry a certified claim. A third-party Certification Body audits the COC and SAP systems, including the capacity for internal audits and site visits for a sample of program sites (similar to the FM group certification program).

**C | Materials from the SAP can carry an FSC claim.**

Materials harvested from the SAP property would come with an FSC claim and would be the equivalent of other FSC certified material procured through an FSC COC certificate.

**Example 2.** A sawmill with a COC certificate and an FM Group certificate procure 1,000 board feet of FSC certified oak from their own group certificate, 1,000 board feet from another certified FMU, and 1,000 board feet from their own smallholder access program would have a total of 3,000 board feet of FSC credits in their COC account. Those FSC credits would be subject to all COC rules and auditing requirements.
**What are Key Differences from FSC FM Group Certification?**

Under the SAP, no certificate is issued to any landowner, and there is no requirement for further action on behalf of the landowner. The material coming off the land comes with a claim, but the landowner is not certified. The assessment of compliance with the SAP is conducted at the point of harvest and not through ongoing compliance with a forest management plan in a group pool.

**Example 3.** *Internal auditing is required throughout the harvest process to verify conformance of the standard for every site in the smallholder access certificate. Under the group certification model, not all parcels in the group are audited by the certificate holder each year.*

**What are the Site-Level Indicators?**

- **Context Assessment**
  - Privately non-industry owned less than 100 ha
  - Central and Southern Appalachia, hardwood forests
  - Low intensity, infrequent harvest

- **Values from FSC P&C**
- **Non-applicable**
  - GMO use, Plantation management, Use of exotic species
- **Low Risk at Regional level**
  - Chemical use, Tenure, Annual allowable cut, Representative Sample Areas, Monitoring and adaptive management, HCV 2, Worker rights, Legality
- **Site-level Indicators**
  - Water and soil quality, Residual stand conditions, habitat and wildlife, special sites (env and social), HCV 3, worker safety, keeping forest as forest
The SAP is a site-level verification of indicators that represent responsible forest management. The program is the result of a regional assessment of the FSC Principles and Criteria, where all elements are placed into one of three categories:

**Non-applicable.** For example, in the AWA area, on small private ownerships, all traditional and civil rights are defined to be rights that are established in legal terms. Thus, this Principle and associated Criteria can be subsumed into legality and categorized as non-applicable.

**Low risk in the region.** For example, small private landowners do not generally use chemical pesticides and fertilizers. Forest management does not require site preparation, planting, competitive release, or other management actions involving chemical use.

**Site level verification.** For example, assessment for HCVs, water protection, habitat for species, and worker safety must be verified on site at the point of harvest.