

## SYNOPSIS OF THE COMMENTS FOR FSC-GUI-60-002 V1-0 EN

### Scale, Intensity and Risk (SIR) Guideline for Standard Developers

January 28, 2016

Comment templates received during the Public Consultation (1 Dec 2015 – 15 Jan 2016):

	Economic North	Economic South	Social North	Social South	Environmental North	Environmental South
<b>Nr of contributors</b>	5	4	-	-	7	-

+3 comments templates were received from a Network Partner; 1 comments template from a CB

**Total: 20**

Reference to SIR Guideline	Comment G = general; T = technical; E = editorial	Comment/ Justification / rationale for change	Proposed change Suggested new wording (additions, modifications, deletions)	PSU observation on each submitted comment	Contributor
General comments:		The objective behind the SIR guideline should be to support standard developers in designing a standard that will <u>effectively and efficiently manage the risk for unacceptable negative impact in the national context</u> . The risk should determine the nature of the efforts applied by organizations to comply with the P&C, through the indicators. Risk – in the SIR concept - should be consistently referred to as the <u>probability of unacceptable negative impact on economic, environmental and social</u>		Good points, added to the document, and clarified throughout	Economic North

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		<p><u>values, based on scale and intensity in a national context.</u> Note: This approach is applied in the guideline, but not consistently, which creates some level of confusion.</p> <p>The focus should be on the activity and its impact on economic, environmental and social values. Note 1: This is compelling in theory, but will be challenging in practice with conflicting values and various levels of risk. Note 2: The focus should not be to designate risk levels to various forest owner categories. This comes later as part of the NFSS.</p> <p>The outcome must remain the same, i.e. as per the criterion, and the role of the effort described in the indicator is to reduce the risk to an acceptable level. In other words, the effort should be proportional to risk.</p> <p>Requirements on routines, documentation etc should be reduced for low risk activities, and may be replaced with robust outcome oriented demonstration and verification. The administrative (process) requirements may increase for high risk activities in order to successfully reduce risk. In this context, the capacity within organizations of different types and sizes to manage risk must be taken into account.</p>			
Main feedback:		Timing and implementation: The SIR must		Agreed, time is of the essence.	Economic

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		<p>be made available asap in order to align transfer process with global strategy re risk-based approach.</p> <p>Simplify and clarify the definition of risk, and improve coherency and consistency throughout the document. A suggestion is included above.</p> <p>Avoid assigning risk to categories of forest managers: Risk should be associated primarily with a given activity. We should not assign risk to various categories of landowners/forest managers too early in the process. Defining SLIMF standards etc should come as a next step once the risk profile of activities are completed, based on scale and intensity in the national context.</p> <p>Include, preferably in the introduction, an additional and very important perspective on risk management: The capability to manage risk in organizations will vary depending on type and size of the organization, as well as on the context of its operations, e.g. based on competence, resources etc. Companies with greater capacity in this regard should be allowed to manage higher levels of risk. This may result in greater freedom to choose means to reach the desired outcome, as long as it can justified in relation to the desired outcome.</p> <p>Include in the introduction a discussion of</p>		<p>Effort has been made to clarify throughout the document.</p> <p>Risk management summary has been added to introduction</p>	North

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		<p>risk at various levels: e.g. Global, National and Stand level, stressing the fact that all criteria are subject to SIR, not only those where it is explicit in the wording of the criterion. SIR should be seen as an overall approach to reduce the risk of unacceptable negative impact on economic, environmental and social values in the national context, i.e. non-compliance with the P&amp;C.</p> <p>Explain more carefully that the SIR matrix are examples only, used to illustrate the approach.</p>			
General comments		<p>Overall, FSC US welcomes the guidance related to risk. We have incorporated modified indicators related to low-risk operations into our current standard, but it will be helpful to have formalized guidance that will be applied globally. However, we have identified a few areas in the draft guidance that would benefit from clarification.</p> <p>One area that could cause confusion is the acronym "SIR" itself. While this acronym is easy to remember, it's a little confusing. It implies that Risk needs to be assessed as an input, along with Scale and Intensity to</p>		<p>Definitions of SIR have been reviewed and clarified throughout the document</p> <p>The concept of RISC, is built into the new language – clearly stating that context is very important. Context and risk are linked.</p> <p>FSC US examples of how SIR is applied are very useful. However, no effort has been made to answer if this approach meets the requirements – this will be addressed through the transfer process.</p>	Network Partner

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		<p>identify the likelihood of negative impact (see Figure 2). However, in reading the guidance closely, the mechanism to evaluate the level of risk is to take the Scale and Intensity of forest operations into account (as in Figure 1). So really, the guidance is implying that risk is an input in some areas and an output in others. It is confusing to use risk interchangeably in two separate situations. Accepting that risk is the likelihood of negative impact is one solution to the double use of Risk. While this seems like a small issue, it could be very confusing for those not close to the concept of SIR.</p> <p>In addition to the clarification of the definition of SIR, it might be important to add 'context within the forest landscape' to the criterion. Given this suggestion, along with a clarification of Risk, a new acronym could be RISC – Risk equals Intensity plus Scale plus Context. The guidance document references context in a number of areas, and it would be very helpful to categorize it as a contributor to Risk. A definition of Context should be added along with the other definitions in Part II of</p>			

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		<p>the guidance.</p> <p>FSC US has developed specific indicators for Small and Low Intensity Managed Forests (SLIMF, referred to as Family Forests in the FSC US standard) in its current Forest Management Standard. FSC US has reviewed indicators and taken three approaches when modifying requirements for Family Forests:</p> <ol style="list-style-type: none"> <li>1. The indicator(s) are explicitly made inapplicable, meaning that auditors can ignore them for Family Forests. (e.g. in instances where the size of the operation requires different management considerations, such as on-site monitoring to calculate growth and yield)</li> <li>2. The indicator(s) are modified for Family Forests. The auditors document conformance to the modified indicator. (e.g. management plan requirements are modified for small landowners)</li> <li>3. The indicator(s) are still applicable, but a risk-based approach is taken. So, the normal indicator is</li> </ol>			

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		<p>applicable, but auditors do not need to document conformance. However, the auditor can issue a finding if they notice a non-conformance. (e.g. where there is a low risk of negative social or environmental impact on SLIMF lands, such as ensuring that forest managers meet all applicable laws regarding employee health and safety)</p> <p>In complying with the revised guidance, we would like to confirm that this approach to developing modified indicators based on scale, intensity and context would still be allowed.</p>			
Throughout document	G	<p>Unfortunately, the SIR work has been undertaken in the continued absence of a formal FSC scheme-wide policy on risk management, which is part of conventional business management and which I have been advocating since 2010.</p> <p>So we lack both a FSC-specific typology of risks within the quality assurance scheme and an exposition of who has what kind of responsibility for SIR in relation to</p>	I will try again in a personal meeting with DG Carstensen when we meet here in Vancouver at the end of next week	No change required as this request requires a system-wide response beyond the scope of the SIR Guidance	Environment North

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		principles, criteria and indicators			
Throughout document	G	FSC Guideline should not allow the managers or ASI-accredited auditors any discretion in the basic interpretation of SIR Guidance; really, this is not a matter for a Guideline but for a FSC normative document.		SIR guidance is written for SGDs so that they can address this concern in national standards. The point is well taken, however some degree of interpretation by CH and CB is inevitable.	
Throughout document	E	Revise definition of SIR. The document reads such that Scale and Intensity equal the level of Risk. Therefore, this definition of SIR is confusing.	Consider clarifying by using risk in a singular sense. Add Context in the Forest Landscape to the definition and change the acronym to RISC – Risk equals Intensity plus Scale plus Context.	Definition of SIR has been clarified throughout the document.	Network Partner
	G	In general I think it is a very good initiative from FSC to move forward in this direction of clarifying SIR		Thank you	CB
	G	I'm not clear on if there is a vs 2 of the document (as announced in the webinar and in the webinar PowerPoint) or if it is draft 2 of vs 1. Note also that in this doc, on the top, it says draft 0 but the one you download is draft 2		The version that was circulated should have been called v1.1, and not V2	CB
	G	I haven't found any reference to having to compare also SIR indicators in the neighbouring countries, and eventually justify significant differences, is this because this is assumed to be done overall for the standards? The lack of comparison has brought problems often, even if it was already supposed to be done		This comparison is beyond the scope of this document and is should be addressed through the transfer process	CB



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		in the development of standards			
General comments to document	G	Requirements for especially activities with high potential impact are generally very high and cause significant amount of work and costs for organizations. Demands on engagement are through the document too high for many cases. Aim to engage should be enough. Through the whole document it can be seen, that the premise and basis for creating SIR guidelines is in tropical forestry. It is essentially important to be able to apply the document also in countries where forestry is small-scaled and management units fragmented.		Examples are provided in the document. SDGs are responsible for setting thresholds based on national conditions.  The intent is not to focus on tropical forestry. Examples are provided from different forest types.  Small scale example are a focus of this document.	Economic North
General comments		It is important that standards provide enough guidance upfront to determine SIR status for MUs. CBs should not be in a position with a lot of flexibility on this assessment. CBs and Forest Managers gain from a preference for low intensity evaluations so that allowing too much deference on this by CBs is an unavoidable conflict of interest.		The document is clear that SDGs are the audience, and that CBs and Forest managers are not responsible for self identifying level of risk	Environment North
General		Consideration and determination of low, medium and high SIR Organizations needs to include consideration of legacy social and environmental impacts and not just forward looking "potential" negative impacts.		Document revised to clarify that social and environmental context are central to determining risk levels.	Environment North
General		The Guideline provides essentially no advice about how to practically determine		SIR Matrix provides assessment of each SIR	Environment North

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		what SIR category should apply to a forest manager. The FSC Australia work on this area should be given attention in this regard		<p>criterion to help SDG make determinations at national scale.</p> <p>FSC Australia work has been reviewed. SDGs from elsewhere could also benefit from the Australian examples.</p>	
Entire document	G	<p>The acronym of SIR may remain a challenge to work with to some degree because generally R is, in practice an independent variable while S and I are dependent variables (where intensity is defined according to volume harvested).</p> <p>Only in some cases does it appear R functions as an independent variable (e.g. country wide corruption analyses), but these cases seem few and represent the few instances where risk is actually quantifiable.</p>	<p>The actual document reads as if the acronym you should be working with is SIC (Scale, Intensity and Context) where R = SIC</p> <p>And one could say RISC (Risk = Intensity, Scale, Context) And define the central problem as one of risk in which scale and intensity are factors.</p> <p>As the Guidance states: <i>The application of SIR provides Standard Developers with the opportunity to define the type of evidence required to demonstrate conformance with the Principles and Criteria based on the potential for negative social, economic or environmental impacts. The scale and intensity of management activities and the environmental and cultural context of the MU can affect this potential impact.</i></p>	Context is clarified in relation to risk	Economic North/ Consultant
Entire document	G	The document does not define low impact, standard impact or high impact. These	Clarify the terms: Low impact	These thresholds are meant to be defined at the national level	Economic North/

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		concepts may also be a challenge for Standard Developers to come to a definition of. Furthermore, the document reads often as if the concepts of <b>potential impact</b> and <b>risk</b> can basically be equated, but I am not sure if this is the intention.	Standard impact High impact  Differentiate between the concepts of: Potential impact and risk Drop one?	by SDGs	Consultant
Entire document	G	The Definition of Intensity: If intensity is the level of impact on environmental values (as the Guidance states), how is this different than the concept of impact. Is this a suitable definition for intensity which is usually defined as the concentration or strength of something whereas impact is its influence or effect.	Question the definition of intensity	Intensity definition has been expanded and clarified to include measure of force etc.	Economic North/ Consultant
Entire Document		Overall, the draft Guidance appears to focus on the development of Indicators for National Standards that are specific to different situations, i.e., for different levels of scale, intensity, or risk. As such, the Guidance appears to expect that National Standards authors will settle questions about how the P&C should be interpreted in different contexts, and not leave basic interpretations of SIR to certificate holders and auditors' discretion. This is probably the single most important aspect of the SIR Guidance, and it is crucial that this approach be maintained.	The Guidance should probably even more explicitly forbid deferring interpretation of the phrase "Scale, Intensity, and Risk" to certificate holders' discretion, given their inherent vested interest in under-estimating the intensity, risk, and impacts of their operations, and in avoiding the full application of the P&C and National Standards' indicators.	Clearly the role of SDGs to make these decisions	Environment North
Throughout	G	While the detailed example approach to	In addition to the detailed example	Given the diversity of national	Network

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		<p>SIR in the guideline is useful, it would be even more useful to provide a range of examples in outline of approaches which would be acceptable to PSU and the PSC. It is an issue of great concern to SDGs and National Offices that approaches to SIR agreed at the national level may not be accepted by those responsible for standard approval. Any concrete guidance on what approaches may or may not be accepted, along with justification on the basis of the principles of SIR, would be extremely valuable; any such guidance and justification must be consistent with existing normative documents. Unnecessary delays to standard approval will occur if we only learn after they are submitted whether nationally agreed SIR provisions will be accepted.</p>	<p>approach to SIR, a number of other acceptable approaches to SIR should be given in outline. If at all possible, it would also be useful to provide examples of approaches which are <u>not</u> acceptable. Discussions within the Forest Network have shown that national approaches vary widely, and it may be useful to gather examples already under development by SDGs.</p>	<p>contexts, it is very hard to provide specific examples of what is not acceptable. The Guidance makes clear that SDGs are empowered to make decisions. Further questions should be directed to PSU.</p>	Partner
	G	<p>My comments refer to the determination of forest manager's SIR category as a whole, rather than a specific aspect of the Guideline. I would suggest a need for a section with more specific direction to address the comments below.</p> <p>The Australian standards development group have been wrestling with SIR for some time in the development of our first national standard.</p> <p>In our circumstance there is general</p>		<p>The Discussion Paper: FSC Australia Forest Stewardship Standard Scale, Intensity And Risk has been reviewed and incorporated as required into the Guidance document.</p> <p>Clearly the role of SDGs to make determinations on SIR and not the CH.</p> <p>Forest manager's level of risk is determined by activity at the</p>	Environment North

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		<p>acceptance of the need for variations in specific indicators for SIR, and that the indicators or annexes are where SIR should be addressed, rather than left to auditor or forest manager discretion.</p> <p>However, maybe we are missing something, but there appears to be a substantial and fundamental problem that is still unaddressed by the Guideline, despite our previous feedback. The Guideline provides essentially no advice about how to practically determine what SIR category should apply to a forest manager.</p> <p>The Australian SDG has released a discussion paper (attached) to float some options with our local stakeholders, and have received some useful feedback to refine the approach. The objective was to make a relatively simple and broadly applicable SIR determination.</p> <p>Essentially what has been proposed in Australia is that simple, easily measurable scale thresholds (e.g.area, harvest unit size) and impact thresholds (e.g. logging type, basal area removal, rotation length) are used to determine SIR. This then determines the SIR (low, medium, high) indicator that applies wherever there are</p>		national level by SDGs. SDGs are welcome to set thresholds as suggested by the Australian method. These need to be determined at the national level based on national context.	

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		<p>SIR specific indicators.</p> <p>To date the logic of this appears to work with all SIR indicators, with the exception of workplace safety where smaller operations often present a higher risk.</p> <p>The Australian SDG tried on a number of alternative options, such as specific risk assessments for individual indicators. The issue here was that the forest manager then spends substantial effort determining risk that would be better expended on the actual implementation to address indicators, and the forest manager effectively controls the SIR assessment, rather than a transparent assessment based on clear metrics.</p> <p>While the concepts are generally sound in the draft guideline, there are clearly some testing/live firing exercises that are required to make it practically applicable on the ground.</p> <p>At the moment, a document is being tossed to regional bodies to work out the most difficult implementation details. While this is fair enough to some extent, the lack of solid direction could easily result in extremely wide variations between countries on how SIR is applied. In</p>			

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		Australia we have some capacity to work through the practical issues, but in other regions a half finished guideline will lead to (more) stress and head scratching by stakeholder, managers and auditors.			
General	G	I am not at all convinced by the division of Organizations into low/mid/high potential negative impacts. In my experience, The Organization can exhibit all three of these categories in different parts of a Management Unit depending on local circumstances and the activity in question.		Agree, and this is the approach proposed. Revisions have been made to the document to ensure that this is consistent throughout	Environment North
General comments to document	G	Requirements for especially activities with high potential impact are generally very high and cause significant amount of work and costs for organizations. Demands on engagement are through the document too high for many cases. Aim to engage should be enough. Through the whole document it can be seen, that the premise and basis for creating SIR guidelines is in tropical forestry. It is essentially important to be able to apply the document also in countries where forestry is small-scaled and management units fragmented (repeat).		Examples are provided in the document. SDGs are responsible for setting thresholds based on national conditions.  The intent is not to focus on tropical forestry. Examples are provided from different forest types.  Small scale example are a focus of this document.	Economic North
General	G	I agree with the Australian assessment that FSC should move quickly to field testing (what the Australians call 'live firing exercises') to demonstrate practicality and adaptability, before a global launch and		Field testing or live fire is outside the scope of this Document	Environment North

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		after some separation of the most critical aspects into a normative document			
Objective, Scope and section 8	G	Help with the application of the SIR concept is very welcome, and guidance rather than more detailed normative requirements is particularly welcome. However, there must be absolute clarity as to the status of this document, and in particular of the SIR matrix. While the examples given are extremely useful in understanding how SIR functions in a given Criterion, it is crucial to stress that these are examples only and need not be taken as a starting point by SDGs.	Clarify the status of this document in the Objective and/or Scope and in section 8 (the SIR matrix).	Status and scope clarified – Guidance, non-normative. SIR matrix is now clearly example indicators.	Network Partner
<b>Part I /Chapter 1 Introduction</b>					
Introduction	G	We support the definition of SIR. However, it should be more clearly as the explicit objective when applying SIR. Note: We cannot change the requirement in the criterion, i.e. the level, but manage the level of risk of non-compliance in different ways depending on the context.	Clarify objective with SIR, e.g. to manage risk.	This has now been clarified	Economic North
Introduction	G	The risk is said to be equivalent with the likelihood of negative impact, which we agree with. However, there is always impact so we should consistently refer to 'unacceptable negative impact'..	Consistency and coherency re use of definitions.	'Unacceptable negative impact' now used consistently throughout	Economic North
Introduction		We disagree: The probability of	Add: The capacity to manage risk will also	Element of 'capacity to manage	Economic



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Paragr. 4		[unacceptable] negative impact does not necessarily grow increase with the size of the operations.	grow, and the probability may actually decrease.	risk' has been added.	North
Figure 1	G	We don't find this figure particularly useful to explain the concept. It does explain the fact that some activities may have a constant risk irregardless of scale. But the figure, we find, adds confusion around the definition of risk and its relation to scale and intensity. Furthermore, we am not sure the risk associated with the use of chainsaws is a good example: I would imagine large organisations are better at managing the risk associated with this equipment. Statistics on accidents in Sweden certainly supports that conclusion.	Consider other way to explain the concept. Figure 4 is more consistent with definitions.	This has now been changed – Figure 1 is now consistent with Figure 4 – risk of potential negative impacts is linked directly to managers level of effort	Economic North
Part 1, Section 1	G	FSC cannot over-stress the importance of 'giving preference to in-the-field outcomes over systems approaches' (Part I section 1).		Point taken, will strive to underscore this point	Environment North
		Part I section 1 is a good introduction.		Thank you	
Part 1 Section 1	G	The task of developing or adapting SIR indicators for low and high impact situations, relative to the IGI norm and standard impact (Part III section 8), is left to the SDGs (Part I section 1). Some people feel that this is a heavy burden and would prefer a regional over a national-level approach. On the one hand I prefer		Point taken, will underscore the role of SDGs in writing standards	Environment North

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		to emphasise the importance of the local knowledge of a SDG, but I am also conscious that this may be just too much work for them			
Part I / Clause 1. / p. 6, lines 21-23	G	Too simple conclusion. Large scale and high intensity (=professional) organizations can likewise better avoid negative impacts.		This has now been clarified and no longer has a focus on scale – also focuses on capacity to manage risk	Economic North
Part I / Clause 1. / p. 6, line 29	G	The definition of MU? For example, in Finland forest ownership is very scattered. Even a large forest owner with millions of hectares forest has its property divided into very small actual management units. It should be stated, that MU can also be something else than organizations whole forest property. This should be taken into account through whole document.		This has now been clarified. This is also why SDGs are in charge of implementing SIR through national standards – to adapt to local conditions.	Economic North
Introduction	T	This Guide is based in a premise that we do not agree. It is not always true that negative impacts are inherent in large-scale operations. The occurrence of negative impacts is related to inadequate control and / or weak impact mitigation tools or poorly planned. A strong audit process is a good way to prevent this occurrence.	FSC has understood that the smaller the area of the MU, and the lower the intensity and frequency of activities in the forest, the lower is the risk or likelihood of negative impacts at any level (local or regional). Likewise, <u>only if P&amp;C&amp;I are not properly met</u> , for large scale and high intensity organizations the probability of negative impacts increases to social, economic and environmental values.	This has now been clarified and no longer has a focus on scale – also focuses on capacity to manage risk	Economic South
Introduction	T	The proportion of forestry activities in a macro region must be considered. A forestry operation may not be the only one that produces negative impacts if other	It is important that this Guide bring clarifications and orientations on how context shall be considered during the construction of indicators and during the	Context now explicitly built into description of SIR.  The focus of the Guidance is	Economic South

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		<p>extensive land uses are being made (agriculture and pasture, for example). A context analysis is important; however, it is necessary some caution because context can sound as discrimination against silvicultural methods used in certain countries and/or type of business – plantation, semi-natural forestry, natural forestry.</p> <p>There is a risk of subjectivity in shift the application of SIR by an auditor. Furthermore, is necessary be clearer that forestry activities will be classified accordingly its SIR, and not the FMU as a whole.</p>	audits, effective the risk of subjectivity and possible discrimination regarding some silvicultural methods.	SDGs. How CBs interpret this is beyond the scope of this document.	
Introduction	T	The premise used to start this guide assumes that negative impacts are related to large scale operations and plantations. The main reason of negative impacts in LSFOs and plantations are much more related to the non-compliance of P&C&I added to failures in governance processes. If these governance issues related to audits, auditors training and CBs performance.	FSC has understood that the smaller the area of the MU, and the lower the intensity and frequency of activities in the forest, the lower is the risk or likelihood of negative impacts at any level (local or regional). Likewise, <u>only if P&amp;C&amp;I are not properly met</u> , for large scale and high intensity organizations the probability of negative impacts increases to social, economic and environmental values.	This has now been clarified and no longer has a focus on scale – also focuses on capacity to manage risk	Economic South
Introduction	T	Is context analysis meaning landscape evaluation? A forestry operation should not take on all the responsibilities regarding negative impacts in some area. A context analysis is important; however, it is necessary some caution because	SIR Guide needs to bring clarifications and orientations on how context shall be considered during the process related to IGIs transfer to NFSS and during the audits, taking care of the risk of subjectivity and possible discrimination regarding to	This has now been clarified and no longer has a focus on scale – also focuses on capacity to manage risk.  Transfer procedure is beyond	Economic South

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		<p>context can sound as discrimination against silvicultural methods of each country and/or type of business – plantation, semi-natural forestry, natural forestry.</p> <p>Moreover, there is a risk of subjectivity in shift the application of SIR to the auditor. SIR needs to be addressed, so that it does not hamper forestry management opportunities around the world. Furthermore, it is necessary to be clear that forestry activities will be classified accordingly its SIR, and not the FMU as a whole.</p>	silvicultural methods.	the scope of this document.	
Introduction	T	<i>We do not agree with the premise that bases the introduction and the guide as a whole. This premise states that negative impacts are inherent to large-scale forest operations. It is necessary to clarify that the occurrence of these negative impacts in LSFOs is conditioned to the non-compliance of P&amp;C&amp;I added to failures in governance processes.</i>	<i>FSC has understood that the smaller the area of the MU, and the lower the intensity and frequency of activities in the forest, the lower is the risk or likelihood of negative impacts at any level (local or regional). Likewise, <u>only if P&amp;C&amp;I are not properly met</u>, for large scale and high intensity organizations the probability of negative impacts increases to social, economic and environmental values.</i>	This has now been clarified and no longer has a focus on scale – also focuses on capacity to manage risk	Economic South
Introduction	T	<i>It is necessary to consider the proportion that forestry activities represents in relation to the whole land use in a macro region. A forestry operation should not take on all the responsibilities regarding negative impacts in some area. A context analysis is important; however, it is necessary some</i>	<i>It is important that this Guide bring clarifications and orientations on how context shall be considered during the construction of indicators and during the audits, making reservations about risk of subjectivity and possible discrimination regarding some silvicultural methods.</i>	<p>Context now explicitly built into description of SIR.</p> <p>The focus of the Guidance is SDGs. How CBs interpret this is beyond the scope of this document.</p>	Economic South

Reference to SIR Guideline	Comment G = general; T = technical; E = editorial	Comment/ Justification / rationale for change	Proposed change Suggested new wording (additions, modifications, deletions)	PSU observation on each submitted comment	Contributor
		<p><i>caution because context can sound as discrimination against silvicultural methods of each country and/or type of business – plantation, semi-natural forestry, natural forestry.</i></p> <p><i>Moreover, there is a risk of subjectivity in shift the application of SIR to the auditor. It is necessary to think in ways of addressing SIR so that it does not hamper forestry management opportunities around the world. Furthermore, is necessary be clearer that forestry activities will be classified accordingly its SIR, and not the FMU as a whole.</i></p>			
Part I, Section 1		The Guidance calls for SIR indicators to be performance-oriented, “giving preference to in-the-field outcomes over systems approaches.” This is a very important requirement and should be clearly maintained in the Guidance.		This has now been clarified in the document.	Environmental North
Part I, Section 1		The Guidance states that SIR indicators for “low” impact and “standard” impact situations are recommended. Meanwhile, indicators for “high” impact situations are even more optional – is this sufficient?	Consider whether SIR indicators for “high” impact situations should be more strongly recommended or even required.	This has now been clarified in the document. Keep in mind that this is Guidance and not normative, so it is not possible to require SDGs to apply	Environment North
Part I, Section 1		The Guidance calls for SIR indicators to be performance-oriented, “giving preference to in-the-field outcomes over systems		This has now been clarified in the document.	Environment North

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		approaches.” This is a very important requirement and should be clearly maintained in the Guidance.			
1, Introduction, p6, 4 <sup>th</sup> clause	G	At the end of the 4 <sup>th</sup> clause the proposed change should be added. It is very important to highlight that the aim of the SIR concept is also to reduce administrative burden.	That correlates with the fact that small, often private MU’s do not have the resources and skills like big MU’s have. To make/keep FSC attractive for smaller MU’s bureaucracy can be effectively reduced in working with SIR	This has now been revised and clarified.	Network Partner
Part I Section 1, p. 6	T	The first line of Part I states that ‘Standard Developers are expected to develop SIR indicators for all those Criteria in FSC P&C V5 where scale, intensity and risk are explicitly mentioned’. However, the transfer procedure (FSC-PRO-60-006 V2-0 EN) states that ‘Where a Principle or Criterion in the P&C V5-1 requires the consideration of Scale, Intensity and Risk..., SDGs <u>may</u> decide to develop additional variations of indicators and verifiers for low, medium and high impact organisations’ and ‘In the absence of the SIR Guideline, PSU <u>recommends</u> the development of at least one SIR indicator variation for low impact organizations that may offer simplified options for these organizations to demonstrate compliance with the Criterion’ (emphasis added). There is a significant change in tone here between the normative procedure and the non-normative guidance which adds to	Change to wording more consistent with the normative procedure, e.g. ‘Standard Developers <del>are expected to develop</del> should consider developing SIR indicators for all those Criteria in FSC P&C V5 where scale, intensity and risk are explicitly mentioned’.	This has now been revised and clarified	Network Partner

<b>Reference to SIR Guideline</b>	<b>Comment</b> G = general; T = technical; E = editorial	<b>Comment/ Justification / rationale for change</b>	<b>Proposed change</b> Suggested new wording (additions, modifications, deletions)	<b>PSU observation</b> on each submitted comment	<b>Contributor</b>
		confusion about what approaches to SIR are acceptable.			
Part I / Clause 1. / p. 6, lines 21-23	G	Too simple conclusion. Large scale and high intensity (=professional) organizations can likewise better avoid negative impacts.		This has now been revised and clarified	Economic North
Part I / Clause 1. / p. 6, line 29	G	The definition of MU? For example, in Finland forest ownership is very scattered. Even a large forest owner with millions of hectares forest has its property divided into very small actual management units. It should be stated, that MU can also be something else than organizations whole forest property. This should be taken into account through whole document.		This has now been revised and clarified	Economic North
<b>Part I /Chapter 2 SIR indicators</b>					
Part II	E	A definition of Context should be added along with the other definitions in Part II of the guidance.		Context has been described more explicitly section 1	Network Partner
Part II, paragraph 3	G	FSC US fully supports that SIR indicators should be performance oriented.		This has now been clarified and reinforced.	Network Partner
Part I / Clause 2. / p. 7, line 11	G	Huge demand to recommend to develop SIR indicators for all mentioned criteria.		Thanks you, this is now clarified.	Economic North
Part 1/section 2	T	Precautionary approach would indicate that variances for management activities and operations (large scale, high intensity plantations) impacts should be a priority. These are operations that likely have the strongest economic rationale and resources for seeking FSC certification and dominate the FSC portfolio.	Standard Developers [may choose to also] MUST develop AS a [third] variance: High potential impact indicators, for management activities with high potential negative impacts.	This is Guidance and not normative. Clear expectations are provided and clarified.	Environment North

Reference to SIR Guideline	Comment G = general; T = technical; E = editorial	Comment/ Justification / rationale for change	Proposed change Suggested new wording (additions, modifications, deletions)	PSU observation on each submitted comment	Contributor
Part 1, clause 2	G	<p>The recommendation of developing two or three additional indicators to each criteria where SIR needs to be addressed (about 20) will at least duplicate the number of indicators on National Standards.</p> <p>It goes in completely different way from the simplification of the process – a premise of IGI’s. Furthermore, the timetable for approval of this Guide is not coordinated with timetable for development of National Standards. Brazil, for example, is already ending the transferring process of its National Standards, and the WG responsible for the Plantation Standard are already considering SLIMF’s situations in the development of indicators. Standard developers will need to change their method and timetable in order to implement the recommendations of this Guide, with a delay in the approval of National Standards.</p> <p>This Guide needs to be alignwith the Strategic Plan, which attempt to simplify the system. In addition, it is necessary to have an evaluation on how much these additional indicators will cost.</p>		Up to SDGs to determine the necessity / utility of developing SIR Indicators – this will differ between jurisdictions.	Economic South
2, SIR indicators, p8, last clause	G	To add at the end of the last clause. Rationale see proposed change.	As SIR variances cause a more complex standard, Standard Developers should carefully think about the need of SIR variances. Often indicators can be formulated in a way that fits for all MU’s but only the Verifier may be different	Up to SDGs to determine the necessity / utility of developing SIR Indicators – this will differ between jurisdictions.	Network Partner



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			(documentation for high potential impact, interview for low potential impact MU's)		
2. SIR Indicators Paragr. 4	G	Here the doc no longer refers to risk but 'low potential impact' etc. This seems inconsistent with proposed definitions. Confusing.	Should refer to probability of unacceptable negative impact, i.e. low risk indicators etc.	This has now been clarified throughout the document. Risk is related to the potential negative impacts of management activities.	Economic North
Part 1, clause 2	G	Some how the suggestion to create different indicators for the ones that needs to address SIR will create high number of indicators compromising premises of IGI, especially those related to the simplification of the process. Furthermore, the timetable for approval of this Guide is not coordinated with timetable for development of National Standards. Brazil, for example, is already ending the transferring process of its National Standards, and the responsible for the Plantation Standard are already considering SLIMF's reality in the development of indicators. Standard developers will need to change their way of work and timetable in order to implement the recommendations of this Guide, and this will probably imply a delay in the approval of National Standards. Is the Strategic Plan being considered when this SIR guide is suggested?, The plan asks for simplifying the system		Up to SDGs to determine the necessity / utility of developing SIR Indicators – this will differ between jurisdictions.	Economic South
Part 1, clause 2	G	The recommendation of developing two or		Up to SDGs to determine the	Economic

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		<p>three additional indicators to each criteria where EIR needs to be addressed (about 20) will at least duplicate the number of indicators on National Standards. This high number of indicators compromises some premises of IGI, especially those related to the simplification of the process.</p> <p>Furthermore, the timetable for approval of this Guide is not coordinated with timetable for development of National Standards. Brazil, for example, is already ending the transferring process of its National Standards, and the responsibilities for the Plantation Standard are already considering SLIMF's reality in the development of indicators. Standard developers will need to change their way of work and timetable in order to implement the recommendations of this Guide, and this will probably imply a delay in the approval of National Standards.</p> <p>We concern that the recommendations of this Guide are going on the other way of the Strategic Plan, which attempt to simplify the system. In addition, it is necessary to have an evaluation on how much these additional indicators will cost.</p>		necessity / utility of developing SIR Indicators – this will differ between jurisdictions.	South
<b>Part I / Chapter 3 Managing risk</b>					
3. Managing for risk...	G	We support the notion that we are indeed managing for risk.	Should also be expressed as the purpose of SIR and used as a consistent approach throughout the document.	This has now been clarified throughout the document	Economic North

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Part 1, Section 3	G	Part I section 3 – medium scale – I think that there is an error: the second mention of ‘large scale’ should be ‘medium scale’. And in the next section on large scale, the text references ‘managed natural forest’ but the footnote 2 says ‘native forests’ which is not a FSC standard glossary term.		Revised to eliminate confusion	Environment North
Part 1, clause 3	T	It is extremely urgent for FSC system an improvement plan for auditing processes. As discussed during GA 2014 (Side meeting – Quality of certification in risky areas and in large operations), many risks raised for LSFOs could clearly be minimized or eliminated with the correction of failures in the auditing process, such as qualification of auditors, better sample definition and consistent approach with interested parties. <b>Suggestion:</b> A comparison exercise between audits considering SIR and other that do not consider this aspect would be interesting too. Based on this, FSC would be able to check if there are positive or negative impacts resulting on the application of SIR and could evaluate the validity to use SIR in audits.	FSC should deliberate responsibilities to CBs improve their audit process in general, and not only charge LSFOs for improvements, because failures occur regardless the SIR of the organization. Both LSFOs and CBs would have to invest in improvements – LSFOs to meet stronger indicators, and CBs to solve their audit failures. It is useless if only LSFOs are obligated to invest in improvements, if the verification of those stronger indicators is weak.	This is an important point, but the responsibilities of CBs are beyond the scope of this document	Economic South
Part 1, 2, pg 8	E	“Low/standard potential impact indicators” seems a bit confusing as a term	I’m not a native English speaker sorry, so better for a native to be more wise if the comment is agreed	Revised to eliminate confusion	CB
<b>Part II/ Chapter 4 What is scale ?</b>					

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Part II / Clause 4. / p. 9, line 1-2	G	See comment on MU above. Scale can't always refer to the size of MU unless MU can be defined as actual management unit (for example, in Finland average of 2 hectares)		This has now been clarified and no longer has a focus on scale – also focuses on capacity to manage risk	Economic North
Part 1 Section 4	T	I prefer the FSC Australia approach to intensity over the AAC approach mentioned in this Guideline. In relation to natural forest management, it should be clarified if FSC really means biological rotations or management-level cutting cycles or concession durations or periods between re-entries.		The FSC Australia approach has been reviewed and parts have been incorporated, keeping in mind that this Guidance will not set specific thresholds – this is the job of SDGs to do.	Environment North
Part 2, clause 4	T	The scale should not be based only on the size of FMU, but also looking into the extent of the operation and its temporal scale is interesting.		This is now clarified	Economic South
Part 2, clause 4	T	The possibility of defining scale not only based on the size of FMU, but also looking into the extent of the operation and its temporal scale would be helpful.		This is now clarified	Economic South
Part II / 4. What is scale?	G	When defining the Scale of any forest management activities, also the context / surrounding areas should be taken into considerations. In Finland for example, MU's are generally relatively small, but more than 90 % of the Finnish forests is subject to intensive industrial forestry, reaching practically all forest stands outside protected areas. Most of the protected areas are located in northern		This has now been clarified and no longer has a focus on scale – also focuses on capacity to manage risk and context of operations	Environment North

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		Finland, while the southern half of the country has only app. 2 % of its forests under protection.			
Part 2, clause 4	T	<i>The possibility of defining scale not only based on the size of FMU, but also looking into the extent of the operation and its temporal scale is interesting.</i>		This has now been clarified and no longer has a focus on scale – also focuses on capacity to manage risk	Economic South
<b>Part II/ Chapter 5 What is intensity ?</b>					
Part II / Clause 5. / p. 9	G	Intensity should be defined more clearly.		This has now been completed	Economic North
Part II, section 5	T	While the SIR matrix details how an indicator might be modified according to the scale or intensity of management in a Management Unit, the Guideline does not clearly indicate what SIR category should apply to The Organization or its managers. There seems to be an assumption (Part II section 5) that low intensity of operation means or implies low negative impact. But low intensities of plant collecting or hunting or species-selective logging applied over large contiguous areas may be devastating for biodiversity, especially if repeated frequently (as in 're-entry' logging in tropical rainforests) or during the breeding season.		SIR is based on risk of unacceptable negative impact of activities, and not on the size of the organization	
Part II, Section 5		The Guidance appears to generally	Consider recognizing important exceptions	This has now been clarified and	Environment

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		assume that “low” intensity management equates to “low” impact. While this is probably generally reasonable, there may be important exceptions, e.g., times when “low” intensity management still has relatively “high” impacts on resources that are especially sensitive to disturbance, etc.	to the presumption that “low” intensity equates to “low” impact.	no longer has a focus on scale – also focuses on capacity to manage risk	al North
Part II / 5. What is intensity?	G	<p>It is correctly stated in the draft, that defining Intensity solely based on the level of harvest within the MU does not address the full scope of the intensity of management activities. This should be more visible on the whole SIR Guideline.</p> <p>For example, the Intensity of forestry is extremely high in whole Finland. The absolutely dominating forestry method is: commercial thinning of individual forest stands to include trees of only one or two age classes (as opposite to natural multi-layer – multi age class structure), using total clear-cuts or other very intensive methods in final felling, and large scale use of either commercially produced seeds or saplings in forest regeneration. Even though the ownership of the forests is heterogeneous and many FMU's are small, the forestry practices are more or less similar almost everywhere, adapted to the wishes of the large scale industry and companies. Most often, also the logging</p>		Intensity has now been clarified  SDGs are responsible for interpreting this in the national context.	Environment al North

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		operations are carried out by the same big companies, who buy the timber. From this follows, that also the small MU's need to take proper actions to protect threatened species and habitats & HVC's. This should be stated more clearly throughout the Guideline.			
Part II / Clause 5. / p. 9	G	Intensity should be defined more clearly.		Intensity has now been clarified.	Economic North
<b>Part II/ Chapter 6. What is risk ?</b>					
Figure 2	G	This is straightforward. A well-established approach to risk.	None.	Thank you	Economic North
What is risk? (Part II)	G	I support this definition. However, it should be expressed as being dependent upon scale and intensity.	Adjust accordingly, for sake of clarity and simplicity of the concept. Scale and intensity serves us well as a base for risk assessment, and are possible to manage for. Use consistent throughout document.	This has now been clarified	Economic North
Part II, Section 6	T	The definition of risk assumes that probabilities can be calculated. Where uncertainty is high, for example when there are inadequate HCV surveys or there is insufficient information or research available on a particular wildlife species of concern, it may not be possible to calculate risk probabilities. There therefore needs to be an assessment of whether the underlying information is sufficient to support a probability assessment and if not, requirements to collect the necessary	The assessment of risk needs to take into account the inherent vulnerability of each value, its resilience, its sensitivity to disturbance, and the proximity to values with high ecological, environmental, social or economic sensitivity and identification of uncertainties and adequacy of data and information used in making a risk determination. Where significant uncertainties exist, risk determinations shall be guided by the precautionary principle	SDGs responsible for establishing thresholds based on national context.  Organizations assess the level of risk in several places throughout the P&Cs, as explained in Figure 3.  Definition and explanation of risk has been revised including uncertainty and precautionary	Environment North

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		information to ensure the risk can be properly calculated before management activities occur.		approach	
Part 2, clause 6	T	A good quality of an auditing process and the implementation of efficient dispute resolution system are capable of reduce the risks (2 repeat)		This is true, good examples.	Economic South
Part 2, clause 6	T	A combination of good quality auditing process and the implementation of an efficient dispute resolution system could decrease these risks.		These are good examples of how to reduce risk	Economic South
Part II / 6. What is Risk?	G	Also the Risk should be clearly considered including the surrounding areas, not only inside one MU.  Again an example from Finland: The Risk for any single unprotected HCV –area to get destroyed by forestry is extremely high, especially if the area is including mature forests on productive land. As stated above, practically all unprotected forests (>90%) on productive forestland, are subject to high intensity industrial forestry using mainly very intensive final felling method, the proportion of clear-cutting being high. From this follows, that the risks for HCV's or RTE-species/habitats are not caused by management operations in one MU, but by the total volume of forestry. In practice, this means that “small” MU's are not		This is a useful example. The Guidance uses other examples to make the same point. SDGs are responsible for developing appropriate indicators to address this.	Environment North



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		necessarily diminishing the Risks at all, compared to large MU's. This should be stated clearly throughout the SIR-Guideline.			
Part 2, figure 2	T	The approach of Figure 2 is biased and it is not correct to keep as it is. It is a completely wrong premise to assume that all plantations or operations using pesticides always represent high negative impact. With this vision a lot of SLIMF operations in Brazil would be considered as high impact because they use pesticides or are plantations. This approach ignores that in situations where precautionary measures or integrated management are implemented (e.g. individual protection equipment and training). The Guide does not indicate in which moment these precautionary measures will be considered during the implementation of SIR. Moreover, it is not the best approach to classify an entire FMU as representing high or low negative impact rather than classify each operation individually.	It is essential to change the examples used in figure 2, because as it is written the figure brings a biased vision.	The figure has been revised and so too has the description, to make clear that context is everything.  Activities determine risk, not the organization. This is clarified throughout the document.	Economic South
<b>Part III / Chapter 7. Application of SIR</b>					
Part III / Clause 7. / p. 10, line 13-14	G	Large scale doesn't mean high risk in all cases -> we support the view		Activities determine risk, not the organization. This is clarified throughout the document.	Economic North

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Part III / Clause 7. / p. 11, line 1-3	G	Fragmentation & conservation areas: This needs to be defined more precise. In Finland, for example, forestry is based on semi-natural forests, which cover large areas. Vegetation etc. is mostly the same as in natural forests. Therefore it is oversimplified to parallel the fragmentation and size of conservation areas		This has now been clarified in this section and throughout the document.	Economic North
Part 3	T	It is not appropriated to bring engagement as an example for SIR, because engagement must happen regardless the SIR classification.		Engagement must happen, the scope of engagement is dependent on risk	Economic South
Part 3	T	We understand that the organization will not be classified as a whole for SIR, but each forestry operation will have its respective SIR. Regarding this understanding, it is necessary to be more explicit in the draft. In addition, it is important to guarantee that the wrong premise (generalize in advance an entire type of business as high SIR – e.g. plantation) will not be supported. The whole draft and specially figure 2 are supporting this biased premise. Furthermore, the Guide does not define who will be responsible to determine which variances of indicators must be met for the organization in each criteria – low, standard or high potential impact indicators (1 repeat)	The Guide must be reviewed to remove the biased premise, because this can influence and skew the creation of indicators by the standard developers. Each certified organization must be in charge of defining the variance of indicators to be met, accordingly to SIR of the forestry operation associated with each criteria. Delegate this to the CBs would also be appropriate; however would imply in more auditing costs.	This has now been clarified in this section and throughout the document.	Economic South
Part 3	T	<i>It is not adequate bring engagement as an</i>		Activities determine risk, not the	Economic

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		<i>example regarding SIR, because engagement must happen regardless the SIR classification.</i>		organization. This is clarified throughout the document.	South
Part III / Clause 7. / p. 10, line 13-14	G	Large scale doesn't mean high risk in all cases -> we support the view		Activities determine risk, not the organization. This is clarified throughout the document.	Economic North
Part III / Clause 7. / p. 11, line 1-3	G	Fragmentation & conservation areas: This needs to be defined more precise. In Finland, for example, forestry is based on semi-natural forests, which cover large areas. Vegetation etc. is mostly the same as in natural forests. Therefore it is oversimplified to parallel the fragmentation and size of conservation areas		This has been clarified as examples and not prescriptive.	Economic North
<b>8 SIR matrix</b>					
SIR Matrix	T	<i>The biased premise that plantations are always associated to negative impacts is being considered in the examples presented in SIR Matrix. Beyond this, the Matrix gives too much complexity to the indicators and can induce standards developers to adopt those examples without a regional adaptation.</i>	<i>Review the examples presented in the SIR Matrix in order to avoid a discriminatory position to the indicators and to reduce the complexity.</i>	Activities determine risk, not the organization. This is clarified throughout the document.	Economic South
SIR Matrix	T	<i>We support the autonomy offered to the standards developers, allowing them to adopt or not the proposals offered by the SIR Matrix; however this freedom is not described explicitly and properly in the Guide.</i>	<i>"Addressing SIR" summarizes the intent of each SIR Criterion and provides sample indicators for some low and high potential management activities. This column includes the IGI that are subject to scale, intensity and risk. Standards Developers</i>	This is a good suggestion and has been added.	Economic South

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			<i>can develop two or three variations of these IGIs at the national level following the suggestions indicated for Organizations with low and high potential negative impact activities. <u>The Standards Developers are free to adapt the suggestions given or create new indicators using the SIR Criterion.</u></i>		
Part 1, pg 13	T	<i>Low impact indicators should allow to reduce the level of effort, but shouldn't imply it per se. This is applicable also in the next part (policies, procedures, etc.)</i>	<i>The SIR indicators should be developed in line with the following considerations: Regarding engagement: Activities with low potential impact mean that the Organization can reduce requirements for stakeholder engagement to demonstrate conformance and should generally be required to understand the interests and concerns of neighbours and adjacent landowners without necessary the need for extensive consultation. This may be extended to potentially affected stakeholders that are not neighbours, for example in Management Units located upstream from water users.</i>	Good suggestion, revised as requested.	CB
8, The SIR Matrix, p 11, 3 <sup>rd</sup> clause	G	Ad at the end of the page. The SIR concept should also be understood of a tool to reduce bureaucracy. This aim is not sufficient described in the guideline yet.	Which is often hand in hand with the aim to reduce administrative burden which concerns especially smaller private MU's.	Good suggestion, revised as suggested.	Network Partner
Part III, Section 8		The Guidance states that indicators for low impact situations may be less burdensome		This has been clarified	Environment North

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		than those for “standard” situations, that indicators for “standard” situations should be commensurate with the IGIs, and that indicators for “high” impact situations should require higher levels of performance than required by the IGIs. This is appropriate and important, given the assumptions behind the drafting of the IGIs, i.e., that the IGIs were generally written for “standard” situations.			
Part III, Section 8, SIR “Matrix” – throughout the Matrix		It should probably be clarified that the indicator-specific discussion is just that, and not sample indicators. The discussion points preceded by indicator numbers (e.g., 1.7.5) but not an “L” or “H” are worded similarly enough to actual indicators, that they might be mistaken for alternate indicators.	It should probably be clarified that the indicator-specific discussion is just that, and not sample indicators.	This has been clarified	Environment North
1.7					
Part III, Section 8, SIR “Matrix:” 1.7.3	G	Many countries have anti-corruption legislation, but no effective enforcement. The risk should be evaluated on outcome based country enforcement indicators, not on whether the legislation itself per se is on the books if it is simply ignored, widely flouted, rarely enforced, etc. Perceptions of corruption is more valuable indicator. Where corruption is endemic, legislation alone is insufficient to control it and	3. Risk: main impact factor. Not dependent on The Organization – the risk of corruption is country specific, and <b>DEPENDENT ON THE EFFECTIVE ENFORCEMENT OF</b> [only relevant in the absence of] <b>COMPREHENSIVE</b> anti-corruption legislation.	Useful clarification. This has been added	Environment North

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		enforcement is often politically constrained.			
SIR Table, 1.7	T	Part III section 1.7 – I do not agree that ‘the risk of corruption is country specific’. I have been dealing this morning with a transnational State-owned company which is notorious for its devotion to bribery as a way of evading compliance with laws and regulations; it is part of its business culture. It also claims to be interested in certification.		This has been clarified, based on this.	Environment North
SIR table, 1.7	T	1-Not sure why there is that much focus on low potential risk, as it should rather be in the high potential impact. The language seem to imply more than what it is (I think) the aim.  2-The policy with the commitment can be very simple and having it publicly available at no cost is even more simple than having to communicate it to neighbours and clients	1-1.7.1, 1.7.2 and 1.7.3: Organizations with low impact activities May limit their effort by identifying only the points in the operations with the highest risk of corruption (access to permits, illegal harvesting, etc) and implement measures to minimize the possibility of corruption occurring. They should make a policy statement, written or otherwise. 2- L 1.7.1: A written or verbal declaration not to give or receive bribes (money) is made publicly available or communicated to neighbours and clients.	This has now been clarified	CB
<b>2.3</b>					
Table, p. 15, 2.3, addressing SIR	G	“All organizations that perform potential high impact activities...” -> too simplified approach. Potential high impact activity doesn’t itself mean high risk. Risk level		Activities determine risk, not the organization. This is clarified throughout the document.	Economic North

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		should be estimated first. (in this example, industrial accident records)			
<b>4.3</b>					
SIR table, 4.3	T	Some public administrations are quite big but cannot always (by law) give preference for employment to local people. This is NA for 4.4, and maybe a higher emphasis is to be put in 4.4 when there are limitations to work in 4.3?	The H should include a provision saying that in cases where law does not allow to give preference to local people, this should be made clear in a justification	Good point, this has been built in	CB
<b>4.5.1</b>					
Table, p. 19, 4.5	G	When estimating potential impacts also existing legislation and other processes should be taken into consideration. Aim for engagement should enough -> no one can't be forced to participate. Demands for organizations performing activities with high potential impact are way too high.		Good point, this has been built in	Economic North
<b>5.1</b>					
Table, p. 20, 5.1	G	Different kinds of forest ownership structures should be recognized. In fragmented forest ownership structure the impact is nearly never high at landscape level, which should be the examination area.		Good point, this has been built into the broader explanation of SIR	Economic North
<b>6.1</b>					
Table, p. 24, 6	G	It should be noticed, that in many cases large organization has better opportunities to take care of environmental values, as well as other values.		Good point, this has been built into the broader explanation of SIR. Context is important.	Economic North
6.1	g	Risk is critical, should also be main impact factor. In areas with RTE species even small scale and low intensity could be high	Change Risk from relevant to high impact factor.	Good point, this has been clarified	Environment North

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		risk. So at this initial level of analysis, identifying risk if very important.			
6.1.2	g	Evaluating SIR impacts is highly related to ones knowledge of an area's environmental values. Thus if environmental values are unknown or underappreciated, SIR may not be applied accurately. Even in areas where management activities appear low impact at first, impacts could be high if environmental values are fully understood. Thus National Standards should not allow SIR evaluations based just on what managers know. Even in apparent low risk situations an effort needs to be made to outreach to additional reliable sources to determine BAI.	In addition to the sources mentioned in 6.1.1 initial evaluation of low potential impact activities need to be accompanied by additional credible and timely information when such information is available.	The Guidance sets out several placed where impacts and risk can be assessed. SDGs are responsible for establishing thresholds based on the potential negative impact of activities.	Environment North
Part III, Section 8, SIR "Matrix" – 6.1.1, 6.1.2, and 6.2.1		Who decides when Organizations have low impact likelihoods due to operating in management units where environmental and social values are unlikely to be affected? Certificate holders have a severe conflict of interest in making such judgments, and a more objective approach is needed for determining the likely level of impact.	Clarify who decides when Organizations have low impact likelihoods – and that it shall not be the Organization making this determination.	Good point, this has been clarified. SDGs responsibility to do this	Environment al North
Part III, Section 8, SIR "Matrix" –6.1.1 and 6.1.2		There is a potential circularity that could seriously undermine Standards, if certificate holders are only required to use Best Available Information (BAI) to identify	Do not exempt certificate holders from using BAI to identify environmental values.	This is an IGI statement, and cannot be changed in the SIR Guidance	Environment al North



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		environmental values and impacts if their existing knowledge suggests likely impacts, given that their existing knowledge may be quite inadequate and BAI may be needed to determine if environmental and social values are likely to be impacted in the first place.			
<b>6.2</b>					
6.2 etc	g	This section is missing some actual measurable guidance for NS developers to use to consider on the ground impacts. While evaluating SIR is certainly site specific, there are measurable factors common to most forest management which can be recommended.	Recommended measurable factors: 1.the size, number of acres, of an operation 2. amount of product taken from the forest. 3. Type of logging methods, or other type of extraction for other products. 4. length of rotation for entry to the forest or length of time for any other type of management intrusion.	This is an IGI statement, and cannot be changed in the SIR Guidance	Environment North
Part III, Section 8, SIR “Matrix” – 6.1.1, 6.1.2, and 6.2.1		Who decides when Organizations have low impact likelihoods due to operating in management units where environmental and social values are unlikely to be affected? Certificate holders have a severe conflict of interest in making such judgments, and a more objective approach is needed for determining the likely level of impact.	Clarify who decides when Organizations have low impact likelihoods – and that it shall not be the Organization making this determination.	Good point, this has been clarified. SDGs responsibility to do this	Environment North
Part III, Section 8, SIR “Matrix:” 6.1.1 & 6.1.2	G	Determination of low or high potential impact operations should not be left to the Organization to determine. There needs to be objective criteria and an independent		Good point, this has been clarified. SDGs responsibility to do this	Environment North

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		determination to avoid conflicts of interest. Indicative information for Organizations with high potential SIR activities should be addressed explicitly. Organizations with a history and legacy of high impacts need to use assessment techniques that include consideration of remedy of legacy impacts such as conflicts with local communities or IP over customary lands, restoration of critical habitat, etc.			
<b>6.4</b>					
Table, p. 27, 6.4	G	Occurrence of RTE species doesn't itself mean that something would threaten them. If there are already mechanisms to protect the species while carrying out forest management, the risk is low.		Good point, however this is not within the scope of the SIR Guidance. This is more specific to meeting the IGIs	Economic North
Table, p. 28, addressing SIR, lines 7-11	E	The demands are impossible. Fieldwork to identify RTE species (thinking of all the species sections such as lichens, insects etc.) is not possible. How does the demand take into account economical sustainability? Organizations should use best available information to identify RTE species and their habitats.	Delete: "In these cases the organization should..." until the end of paragraph.	These are suggestions only SDGs are to develop appropriate indicators that reflect the national context.	Economic North
Table, p. 28, addressing SIR, lines 25-27	E	Too high demand. This gives NGOs a chance to dictate what to do.	Delete: "Organizations with high potential impact activities..."	These are suggestions only SDGs are to develop appropriate indicators that reflect the national context.	Economic North
Table, p. 29, addressing SIR, H 6.4.1	G	H 6.4.1 Too high demands. Research can't be demanded. This shouldn't include locally rare and threatened species.		These are suggestions only SDGs are to develop appropriate indicators that	Economic North

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				reflect the national context.	
Table, p. 27, 6.4	G	Occurrence of RTE species doesn't itself mean that something would threaten them. If there are already mechanisms to protect the species while carrying out forest management, the risk is low.		Good point, however this is not within the scope of the SIR Guidance. This is more specific to meeting the IGIs	Economic North
Table, p. 28, addressing SIR, lines 7-11	E	The demands are impossible. Fieldwork to identify RTE species (thinking of all the species sections such as lichens, insects etc.) is not possible. How does the demand take into account economical sustainability? Organizations should use best available information to identify RTE species and their habitats.	Delete: "In these cases the organization should..." until the end of paragraph.	These are suggestions only SDGs are to develop appropriate indicators that reflect the national context.	Economic North
Table, p. 28, addressing SIR, lines 25-27	E	Too high demand. This gives NGOs a chance to dictate what to do.	Delete: "Organizations with high potential impact activities..."	These are suggestions only SDGs are to develop appropriate indicators that reflect the national context.	Economic North
Table, p. 29, addressing SIR, H 6.4.1	G	H 6.4.1 Too high demands. Research can't be demanded. This shouldn't include locally rare and threatened species.		These are suggestions only SDGs are to develop appropriate indicators that reflect the national context.	Economic North
Part III, Section 8, SIR "Matrix" –6.4.3		Reduced impact logging (RIL) is unlikely to help protect RTE species, given that RIL standards do not tend to address the identification and protection of such species and their habitats.	Do not rely on RIL for outcomes for which it's not designed. Use measures actually sufficient to identify and protect RTE species and their habitats.	These are suggestions only SDGs are to develop appropriate indicators that reflect the national context.	Environmental North
Part III, Section 8, SIR "Matrix" –6.4.3		Reduced impact logging (RIL) is unlikely to help protect RTE species, given that RIL standards do not tend to address the	Do not rely on RIL for outcomes for which it's not designed. Use measures actually sufficient to identify and protect RTE	These are suggestions only SDGs are to develop appropriate indicators that	Environmental North

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		identification and protection of such species and their habitats.	species and their habitats.	reflect the national context.	
<b>6.5</b>					
Table, p. 30, Relevant impact factor, 3. Risk	G	This should take into account the type of forestry ie. plantations vs. semi-natural forests. Commercial forests may be in nearly natural condition.		Good point, this is national context to be considered by SDGs	Economic North
Table, p. 30, Addressing SIR 6.5.4	G	Too simplified conclusions. Conservation areas are not the only way to protect ecosystems.		This is just one example, but is clarified.	Economic North
<b>7.6</b>					
Table, p. 33	G	Demands for engagement should be reasonable.		Good point, this is national context to be considered by SDGs	Economic North
Table, p. 34, L7.6.3	E	This should be deleted. Demand could lead to dictation by NGOs	Delete: "Culturally appropriate engagement..."	IGI requires engagement, but SDGs can change this to meet national context. Matrix provides examples only	Economic North
<b>8.5</b>					
Table, p. 36, Addressing SIR 8.5.1-8.5.3	G	If an organization has FSC CoC, other demands aren't needed.		SDGs can decide this based on local context	Economic North
<b>9.1</b>					
Table, p. 38, 3. Risk	G	The occurrence of HCVs doesn't automatically lead to high potential impact.		Good point. Matrix includes examples only. SDGs can decide this based on local context	Economic North
Table, p. 38, 3. Risk, Addressing SIR, lines 7-12	E/G	Deleted paragraphs: Way too high demands, not possible to proceed.	Delete: "For example, if rare or threatened..." – delete whole paragraph. Delete: "Organizations with high potential	Matrix includes examples only. SDGs can decide this based on local context	Economic North

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and p. 39 lines 3-6		General comment: If the locations of HCV areas are known, there shouldn't be other demands or need for research.	impact activities..."		
<b>9.3</b>					
Table, p.40, 9.3	G	Risk: If HCV's are known and there are existing activities to protect them, no need for extra demands. Protected value determines how to proceed forest management activities. Occurrence of HCV shouldn't prevent all actions.		Matrix includes examples only. SDGs can decide this based on local context	Economic North
Table, p. 38, 3. Risk, Addressing SIR, lines 7-12 and p. 39 lines 3-6	E/G	Deleted paragraphs: Way too high demands, not possible to proceed.  General comment: If the locations of HCV areas are known, there shouldn't be other demands or need for research.	Delete: "For example, if rare or threatened..." – delete whole paragraph. Delete: "Organizations with high potential impact activities..."	Matrix includes examples only. SDGs can decide this based on local context	Economic North
<b>9.4</b>					
Table, p. 40 Addressing SIR, 9.4.1-9.4.2	G	Why only organization with low potential impact activities is recommended to use existing FSC tools for monitoring? This is weird.		Tool is built for SLIMFs, and can be used for Organizations with low potential negative impact activities	Economic North
Table, 9.4.1, 9.4.2	T	I thought that the treatment of high impacts was more lenient than I would have expected. Part III section 9.4.1 and 9.4.2 are notably brief compared with the volumes of guidance on management of HCVs.		Matrix includes examples only. SDGs can decide this based on local context.	Environment North
Part III, Section 8, SIR "Matrix" – throughout the Matrix, including		At various junctures, the expectations for "high" potential impact management appears to be what one would expect of "standard" impact situations, and not a	Design the "high" impact indicators (and guidance towards them) to actually be more robust than expectations for "standard" situations (the default IGIs).	Matrix includes examples only. SDGs can decide this based on local context	Environment North

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but not limited to 9.4.1 and 9.4.2		more robust approach that goes beyond standard expectations. Examples include but are not limited to 9.4.1 and 9.4.2.			
Table, p.40, 9.3	G	Risk: If HCV's are known and there are existing activities to protect them, no need for extra demands. Protected value determines how to proceed forest management activities. Occurrence of HCV shouldn't prevent all actions.		Matrix includes examples only. SDGs can decide this based on local context	Economic North
<b>Annex 1</b>					
Annex 1	T	<i>Issues discussed in annex 1 were already addressed through the IGIs and are being considered by standards developers for all kind of operations, regardless SIR. Furthermore, by doing an adequate audit those issues become irrelevant. It is also important some caution to the certification process in order to not increase the complexity and costs, and lose the simplicity, becoming more inaccessible to those interested in participating.</i>	<i>We consider the deletion of annex 1, because all this information is already covered by IGIs and by the orientations described in this Guide.</i>	Annex 1 has been requested to be included. It is for information purposes.	Economic South