
Policy for Association Remediation Framework

**On ending disassociation and maintaining conditional association for commission of unacceptable activities
Version 1, Draft 0.1**

FSC Remediation Framework

Template for Organization Specific Roadmap Processes

Section U – Universal Requirements: Foundational Infrastructure, Principles and Procedures

1. Establish foundational infrastructure, principles and procedures for implementation of the REMEDIATION FRAMEWORK via an ORGANIZATION-SPECIFIC ROADMAP

Requirement:

1.1. Conducive implementation environment

THE COMPANY GROUP shall create an environment conducive for implementation of the ORGANIZATION-SPECIFIC ROADMAP by providing sufficient resources and applying continuous learning and improvement principles to ensure and improve delivery of the ORGANIZATION-SPECIFIC ROADMAP.

Performance Indicators:

- 1.1.1. Policies and procedures are in place to ensure sufficient and appropriately trained personnel and WORKERS.
- 1.1.2. STAKEHOLDERS able to file concerns about ORGANIZATION-SPECIFIC ROADMAP implementation through the publicly available GRIEVANCE MECHANISM (see 1.3 [0.1]).
- 1.1.3. Enabling conditions and training for operation of FPIC processes are in place for engagement with RIGHTS-HOLDERS and other STAKEHOLDERS
- 1.1.4. Continuous learning principles lead to changes being made to improve policies, procedures and practice.
- 1.1.5. GRIEVANCE MECHANISM registered case results regularly reviewed for root causes and review leads to improvements in policies, procedures and practice.
- 1.1.6. Evidence of the application of all the above aspects across all requirements of ORGANIZATION-SPECIFIC ROADMAP.

Requirement:

1.2. REMEDIATION GOVERNANCE BODY *Stakeholder Consultation Point*

THE COMPANY GROUP shall establish a REMEDIATION GOVERNANCE BODY to govern the implementation of the ORGANIZATION-SPECIFIC ROADMAP.

Performance Indicators:

- 1.2.1. A semi-independent self-managed REMEDIATION GOVERNANCE BODY

established for governing the ORGANIZATION-SPECIFIC ROADMAP and ensuring quality of remediation outcomes for RIGHTS-HOLDERS and forests affected by HARM:

- 1.2.1.1. Comprised of representative RIGHTS-HOLDERS and other STAKEHOLDERS, social and environmental INDEPENDENT EXPERTS and representatives for THE COMPANY GROUP;
 - 1.2.1.2. At all times comprises of at least 75% INDEPENDENT members in no manner connected to THE COMPANY GROUP.
 - 1.2.1.3. The first constituted REMEDIATION GOVERNANCE BODY assessed by THE FSC THIRD PARTY VERIFIER for gender and age diversity, and in multi-cultural regions for racial/ethnic/religious diversity, independence, balance of interests and expertise.
 - 1.2.1.3.1. Thereafter, the REMEDIATION GOVERNANCE BODY uses self-management governance principles.
- 1.2.2. The REMEDIATION GOVERNANCE BODY terms of reference include:
- 1.2.2.1. Regular review of impacts and outcomes of REMEDY OF HARM processes;
 - 1.2.2.2. Upon request by THE COMPANY GROUP conduct or oversee interviews, “town-halls”, surveys, etc. with RIGHTS-HOLDERS and other STAKEHOLDERS on specific subject matters in the ORGANIZATION-SPECIFIC ROADMAP;
 - 1.2.2.3. Oversight of the ORGANIZATION-SPECIFIC ROADMAP milestones to be delivered to THE FSC THIRD PARTY VERIFIER as part of the verification process;
 - 1.2.2.4. Oversight of STAKEHOLDER consultation processes for the REMEDIATION FRAMEWORK;
 - 1.2.2.5. Review of specific methodologies, policies and procedures as detailed in the ORGANIZATION-SPECIFIC ROADMAP;
 - 1.2.2.6. Oversight of the appointment of INDEPENDENT EXPERTS.

Requirement:

1.3. GRIEVANCE MECHANISM

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall have GRIEVANCE MECHANISMs.

Performance Indicators:

- 1.3.1. A GRIEVANCE MECHANISM appropriate to RIGHTS-HOLDERS and other STAKEHOLDERS is in place within X months of the Roadmap being agreed, including:
 - 1.3.1.1. Procedures, methodologies and a structure for providing access to processes that address grievances including REMEDY for environmental and social HARM in line with Section R and Sub-sections RS and RE of the REMEDIATION FRAMEWORK.
 - 1.3.1.2. A clear, transparent and multi-stakeholder independent governance structure;
 - 1.3.1.3. An approach that is “rights-compatible”: its outcomes and REMEDIES accord with internationally recognized HUMAN RIGHTS conventions, standards and FPIC;
 - 1.3.1.4. Relevant RIGHTS-HOLDERS are aware of, informed appropriately about and satisfied with the GRIEVANCE MECHANISM and its use in practice;
 - 1.3.1.5. HARM that is identified through the GRIEVANCE MECHANISM recorded in the REGISTRY OF HARM (see section 3.3);
 - 1.3.1.6. RIGHTS-HOLDERS and other STAKEHOLDERS are using the GRIEVANCE

MECHANISM;

- 1.3.1.7. Grievance records are available indicating documented timing and status of response;
The GRIEVANCE MECHANISM is based on dialogue and engagement, focusing on processes of direct and if needed mediated dialogue to seek agreed solutions, leaving adjudication to independent third-party mechanisms, whether judicial or non-judicial.
- 1.3.2. The GRIEVANCE MECHANISM procedures and methodologies are reviewed by the REMEDIATION GOVERNANCE BODY, PEER REVIEWED by INDEPENDENT EXPERTS and assessed by THE FSC THIRD PARTY VERIFIER.
 - 1.3.2.1. Relevant measures are in place for improving the GRIEVANCE MECHANISM.
- 1.3.3. The GRIEVANCE MECHANISM effectiveness and outcomes are reviewed every two years by the REMEDIATION GOVERNANCE BODY to improve upon procedures and STAKEHOLDER consultation held as part of that process.

Requirement:

1.4. Prevention of UNACCEPTABLE ACTIVITIES, re-occurrence and violations of the FSC Policy for Association

THE COMPANY GROUP shall have systems in place to stop and prevent UNACCEPTABLE ACTIVITIES and shall demonstrate continuous improvement in stopping on-going UNACCEPTABLE ACTIVITIES.

Performance Indicators:

- 1.4.1. Management systems such as policies, plans, procedures and/or work instructions are documented, including management system review processes, that include:
 - 1.4.1.1. Due diligence systems (see sections 1.8 and 1.9 below on HRDD and EDD systems) that identify on-going UNACCEPTABLE ACTIVITIES;
 - 1.4.1.2. Internal and/or INDEPENDENT THIRD PARTY and FSC THIRD-PARTY VERIFIED PfA compliance assessments;
 - 1.4.1.3. Management practice reviews;
 - 1.4.1.4. Feedback from GRIEVANCE MECHANISM and REGISTRY OF HARM.
- 1.4.2. Demonstrated reduction and then absence of on-going UNACCEPTABLE ACTIVITIES by THE COMPANY GROUP through PfA compliance assessments conducted by THE FSC THIRD PARTY VERIFIER. **5 lines timescale needed**
- 1.4.3. Demonstrated absence of NEW UNACCEPTABLE ACTIVITIES by THE COMPANY GROUP through PfA compliance assessments conducted by THE FSC THIRD PARTY VERIFIER. **5 lines timescale needed- none from the outset the roadmap.**
- 1.4.4. Full PfA compliance should be completed for THE COMPANY GROUP prior to ENDING DISASSOCIATION. **5 lines timescale needed.**

Requirement:

1.5. Identification and RESPECT of RIGHTS and RIGHTS-HOLDERS

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall identify and RESPECT RIGHTS and RIGHTS-HOLDERS.

Performance Indicators:

- 1.5.1. Policy and procedures for identifying and respecting RIGHTS and RIGHTS-HOLDERS reviewed by the REMEDIATION GOVERNANCE BODY, PEER REVIEWED and assessed by THE FSC THIRD-PARTY VERIFIER within X months of the Roadmap being agreed.
- 1.5.2. INDICATIVE map(s) of TENURE RIGHTS including access RIGHTS for RIGHT-HOLDERS for every village in and ADJACENT to THE COMPANY GROUP AND ITS WOOD SUPPLIERS' MANAGEMENT UNITS and demonstrating how these TENURE RIGHTS have been affected since the start of operations within X years of Roadmap being agreed. (See also R 3.3.1.6 & R 3.3.2.6)

Requirement:

1.6. FREE PRIOR INFORMED CONSENT (FPIC)

The practice of FREE PRIOR INFORMED CONSENT (FPIC) shall be implemented by THE COMPANY GROUP AND ITS WOOD SUPPLIERS in interaction with RIGHTS-HOLDERS.

Performance Indicators:

- 1.6.1. THE COMPANY GROUP AND ITS WOOD SUPPLIERS maintain and implement FPIC policies and procedures at operation locations.
- 1.6.2. FPIC policies and procedures reviewed by the REMEDIATION GOVERNANCE BODY, PEER REVIEWED and assessed by THE FSC THIRD-PARTY VERIFIER within X months of the Roadmap being agreed.
- 1.6.3. THE COMPANY GROUP AND ITS WOOD SUPPLIERS provide FPIC training to WORKERS that interact with RIGHTS-HOLDERS or who create policies that affect RIGHTS-HOLDERS.
- 1.6.4. THE COMPANY GROUP AND ITS WOOD SUPPLIERS document all practice of FPIC.
- 1.6.5. Evidence of the application of FPIC across all requirements of ORGANIZATION-SPECIFIC ROADMAP.
- 1.6.6. RIGHTS-HOLDERS in all FPIC relevant cases engaged in a mutually agreed FPIC process and satisfied with progress towards a FPIC agreement.

Requirement:

1.7. Identification of STAKEHOLDERS and their engagement in the process

Stakeholders shall be identified and engaged in the process.

Performance Indicators:

- 1.7.1. Policy and procedures, reviewed by the REMEDIATION GOVERNANCE BODY, PEER REVIEWED and assessed by THE FSC THIRD-PARTY VERIFIER within X months of the Roadmap being agreed, that include:
 - 1.7.1.1. The identification of STAKEHOLDERS (see Section 1.5 as a

- STAKEHOLDER subset) and STAKEHOLDER mapping;
- 1.7.1.2. The identification of priority STAKEHOLDERS (“key STAKEHOLDERS”);
 - 1.7.1.3. The engagement of and CONSULTATION with STAKEHOLDERS in the development and implementation of the ORGANIZATION-SPECIFIC ROADMAP using best practices and specialist approaches, including:
 - 1.7.1.3.1. Representation of all relevant STAKEHOLDERS and the active application of approaches to redress power imbalances;
 - 1.7.1.3.2. Setting of STAKEHOLDER engagement goals.
 - 1.7.1.4. Record-keeping of the identification and engagement of and CONSULTATION with STAKEHOLDERS.
- 1.7.2. Records of STAKEHOLDER processes.
- 1.7.3. Participatory evaluation of STAKEHOLDERS engagement, reviewed by the REMEDIATION GOVERNANCE BODY.

Requirement:

1.8. HUMAN RIGHTS DUE DILIGENCE (HRDD) framework

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall have a HRDD framework in place.

Performance Indicators:

- 1.8.1. A HUMAN RIGHTS DUE DILIGENCE (HRDD) framework that includes processes and procedures for:
 - 1.8.1.1. Identification of potential HUMAN RIGHTS impacts - in THE COMPANY GROUP's own activities or business relationships - through HUMAN RIGHTS RISK ASSESSMENTS (HRRAs) of sector specific HUMAN RIGHTS impacts (sector specific SALIENT HUMAN RIGHTS ISSUES);
 - 1.8.1.2. Prioritisation of SALIENT HUMAN RIGHTS ISSUES;
 - 1.8.1.3. The identification of actual HUMAN RIGHTS impacts - in THE COMPANY GROUP's own activities or business relationships - through HUMAN RIGHTS IMPACT ASSESSMENTS (HRIAs) paying particular attention to issues highlighted by HRRAs;
 - 1.8.1.4. Analysis of HRIAs for the presence of HARM;
 - 1.8.1.5. HARM recorded in a REGISTRY of HARM (see Section R: Identification of HARM);
 - 1.8.1.6. The integration of findings of HRDD processes into THE COMPANY GROUP procedures in order to take action to cease, prevent and mitigate potential adverse impacts;
 - 1.8.1.7. Performance tracking and communication with STAKEHOLDERS and publicly (see also Section R: Remedy Process, Pilots & Transparency and Demonstration of Progress).
- 1.8.2. INDEPENDENT MONITORING reports on progress of implementation of the HRDD approach with public summaries published annually. Stakeholder Consultation Point
- 1.8.3. HUMAN RIGHTS DUE DILIGENCE (HRDD) framework, processes, procedures, sector specific HUMAN RIGHTS impacts and the identification of SALIENT HUMAN RIGHTS ISSUES reviewed by the REMEDATION GOVERNANCE BODY, PEER REVIEWED by INDEPENDENT EXPERTS and assessed by THE FSC THIRD-PARTY VERIFIER. Stakeholder Consultation Point

Track Requirement:

1.9. ENVIRONMENTAL DUE DILIGENCE (EDD) framework

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall have an EDD framework in place.

Performance Indicators:

- 1.9.1. An ENVIRONMENTAL DUE DILIGENCE (EDD) framework that includes processes and procedures for:
 - 1.9.1.1. The identification of potential impacts on ENVIRONMENTAL VALUES - in THE COMPANY GROUP's own activities or business relationships - through ENVIRONMENTAL RISK ASSESSMENTS (ERAs) of sector specific environmental impacts (SALIENT ENVIRONMENTAL ISSUES); **Stakeholder Consultation Point**
 - 1.9.1.2. Prioritisation of SALIENT ENVIRONMENTAL ISSUES;
 - 1.9.1.3. The identification of actual environmental impacts - in THE COMPANY GROUP's own activities or business relationships - through ENVIRONMENTAL IMPACT ASSESSMENTS (EIAs) paying particular attention to issues highlighted by ERAs;
 - 1.9.1.4. Analysis of EIAs for the presence of HARM;
 - 1.9.1.5. HARM recorded in a REGISTRY of HARM (see Section R: Identification of HARM);
 - 1.9.1.6. The integration of findings of EDD processes into COMPANY GROUP procedures in order to take action to cease, prevent and mitigate potential adverse impacts;
 - 1.9.1.7. Performance tracking and communication with STAKEHOLDERS and publicly (see also Section R: Remedy Process, Pilots & Transparency and Demonstration of Progress).
- 1.9.2. INDEPENDENT MONITORING reports on progress of implementation of the EDD approach with public summaries published annually. **Stakeholder Consultation Point**
- 1.9.3. ENVIRONMENTAL DUE DILIGENCE (EDD) framework, processes, procedures, sector specific impacts on ENVIRONMENTAL VALUES and the identification of SALIENT ENVIRONMENTAL ISSUES, reviewed by REMEDIATION GOVERNANCE BODY, PEER REVIEWED by INDEPENDENT EXPERTS and assessed by THE FSC THIRD-PARTY VERIFIER. **Stakeholder Consultation Point**

Track Requirement:

1.10. Transparency and Demonstration of Progress

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall establish systems and platforms that enable it to demonstrate progress and disclose information required for the assessment of implementation of the ORGANIZATION-SPECIFIC ROADMAP to the THIRD-PARTY VERIFIER, REMEDIATION GOVERNANCE BODY and for PEER REVIEW.

Performance Indicators:

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- 1.10.1. Systems that enable the REMEDIATION GOVERNANCE BODY and PEER REVIEWERS to receive specific documents and other evidence for review as specified throughout the ORGANIZATION-SPECIFIC ROADMAP.

- 1.10.2. The REMEDIATION GOVERNANCE BODY and PEER REVIEWERS receive the information necessary to assess the ORGANIZATION-SPECIFIC ROADMAP implementation.
- 1.10.3. Systems that enable The FSC THIRD PARTY VERIFIER to receive:
 - 1.10.3.1. Specific documents and other evidence for verification, compliance and implementation assessment of the ORGANIZATION-SPECIFIC ROADMAP as specified throughout the ORGANIZATION-SPECIFIC ROADMAP;
 - 1.10.3.2. Specific items detailed in the ORGANIZATION-SPECIFIC ROADMAP for publication on the REMEDIATION PROGRESS DEMONSTRATION WEBSITE.
- 1.10.4. THE FSC THIRD PARTY VERIFIER receives the information necessary to assess the ORGANIZATION-SPECIFIC ROADMAP implementation and/or required for publication on the REMEDIATION PROGRESS DEMONSTRATION WEBSITE.
- 1.10.5. A website or website area established by THE COMPANY GROUP to report on its implementation and progress against its ORGANIZATION-SPECIFIC ROADMAP, including:
 - 1.10.5.1. A prominent link to the REMEDIATION PROGRESS DEMONSTRATION WEBSITE that explains that the formal status of progress of THE COMPANY GROUP against the ORGANIZATION-SPECIFIC ROADMAP is detailed on that site;
 - 1.10.5.2. Documents and other information required to be made publicly available as specified throughout the ORGANIZATION-SPECIFIC ROADMAP;
 - 1.10.5.3. Additional items that relate to the ORGANIZATION-SPECIFIC ROADMAP as deemed necessary by the REMEDIATION GOVERNANCE BODY or THE COMPANY/THE COMPANY GROUP.
- 1.10.6. Culturally appropriate information access systems (for the region and STAKEHOLDERS in question), in addition to the provision website based information, that allow for the access to information required to be made publicly available by the ORGANIZATION-SPECIFIC ROADMAP.
- 1.10.7. THE FSC THIRD PARTY VERIFIER receives for publication on the REMEDIATION PROGRESS DEMONSTRATION WEBSITE:
 - 1.10.7.1. The governing documents and details of the serving members of the REMEDIATION GOVERNANCE BODY;
 - 1.10.7.2. A link to directly access the GRIEVANCE MECHANISM;
 - 1.10.7.3. FPIC policies and procedures.
- 1.10.8. THE COMPANY GROUP ORGANIZATION-SPECIFIC ROADMAP website (or website area) publishes as a minimum:
 - 1.10.8.1. The governing documents and serving members of the REMEDIATION GOVERNANCE BODY;
 - 1.10.8.2. A link to directly access the GRIEVANCE MECHANISM;
 - 1.10.8.3. PfA compliance assessments;
 - 1.10.8.4. Policies for the identification and respect of RIGHTS and RIGHTS-HOLDERS;
 - 1.10.8.5. FPIC policies;
 - 1.10.8.6. Policies for identification of STAKEHOLDERS and their engagement;
 - 1.10.8.7. COMPANY GROUP performance tracking and public communication on the details of the HRDD and EDD systems.
 - 1.10.8.8. Public summaries of INDEPENDENT MONITORING reports and any other independent reports on progress of implementation of the HRDD and EDD approaches.

Section T – Trust-building measures

2. Implement additional Measures to Rebuild Trust with THE COMPANY GROUP and Protect FSC's Reputation.

Requirement:

2.1. Mitigation of risks in wood and forest products supply chains

THE COMPANY GROUP shall have a wood and forest products supply that meets as a minimum the requirement of FSC Controlled Wood throughout its supply chains.

Performance Indicators:

- 2.1.1. Categorisation of SUPPLIERS into *1st Priority Suppliers*, *2nd Priority Suppliers* and *All Other Suppliers* with the participation of STAKEHOLDERS and reviewed by REMEDIATION GOVERNANCE BODY and assessed by THE FSC THIRD-PARTY VERIFIER **within X months** of the Roadmap being agreed.
- 2.1.2. All wood and forest product supply entering into all THE COMPANY GROUP facilities FSC Controlled Wood compliant:
 - 2.1.2.1. Prior to ENDING DISASSOCIATION, *1st Priority Suppliers* compliant with FSC-STD-30-010.
 - 2.1.2.2. Prior to ENDING DISASSOCIATION, all THE COMPANY GROUP facilities are compliant with FSC STD-40-005.
 - 2.1.2.3. Within **A years** of ending disassociation, *2nd Priority Suppliers* compliant with FSC-STD-30-010.
 - 2.1.2.4. Within **B years** of ending disassociation, all wood/forest products supply entering into all THE COMPANY GROUP facilities are FSC Controlled Wood equivalent or above.

Requirement:

2.2. Payment of fees, taxes, fines and penalties

THE COMPANY GROUP shall pay all legally due fees, taxes, fines and penalties.

Performance Indicators:

- 2.2.1. All legally required fees and taxes due as part of normal business practice paid in full.
- 2.2.2. All legally required fees, taxes, fines and penalties for damage to ENVIRONMENTAL VALUES or HARM to RIGHTS-HOLDERS paid in full.

Requirement:

2.3. Anti-corruption measures

THE COMPANY GROUP shall implement anti-corruption measures.

Performance Indicators:

- 2.3.1. Anti-corruption and anti-bribery commitment and measures publicly available and implemented throughout the COMPANY GROUP.

Requirement:

2.4. Transparency and Demonstration of Progress

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall demonstrate progress. It shall disclose information, required for the assessment of implementation, to the REMEDIATION GOVERNANCE BODY, THE FSC THIRD-PARTY VERIFIER, and for PEER REVIEW.

Indicators:

2.4.1. The REMEDIATION GOVERNANCE BODY, PEER REVIEWERS and THE FSC THIRD PARTY VERIFIER receive what is necessary to review and verify the aspects specified in the ORGANIZATION-SPECIFIC ROADMAP.

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2.4.2. THE COMPANY GROUP ORGANIZATION-SPECIFIC ROADMAP website (or website area) publishes as a minimum:

2.4.2.1. Anti-corruption and anti-bribery commitment and measures.

2.4.3. THE FSC THIRD PARTY VERIFIER receives for verification and publication on the REMEDATION PROGRESS DEMONSTRATION WEBSITE:

2.4.3.1. [NB no sub-indicators here, placeholder for stakeholder comment]

Section R – General REMEDY OF HARM Procedures

3. Establish REMEDY OF HARM procedures

Requirement:

3.1. Identification and **RESPECT** of **RIGHTS** and **RIGHTS-HOLDERS**

See Section U above

NOTE: This requirement is repeated because it is crucial to iteratively revisit the identification of RIGHTS and RIGHTHOLDERS regularly and in the light of the identification of specific incidents of HARM.

Requirement:

3.2. Identification of **STAKEHOLDERS** and their engagement in the process

See Section U above

NOTE: This requirement is repeated because it is crucial to iteratively revisit the identification of STAKEHOLDERS regularly and in the light of the identification of specific incidents of HARM.

Requirement:

3.3. Identification of environmental and social HARM

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall identify and assess HARM.

Performance Indicators:

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3.3.1. Methodologies (including a methodology review mechanism), to deliver mapping and inventories of PAST and current status in all IMPACT AREAS of THE COMPANY GROUP AND ITS WOOD SUPPLIERS, PEER REVIEWED by INDEPENDENT EXPERTS, reviewed by the REMEDIATION GOVERNANCE BODY and assessed by THE FSC THIRD-PARTY VERIFIER **within X months** of the ORGANIZATION-SPECIFIC ROADMAP being agreed, including:

- 3.3.1.1. NATURAL FOREST including areas known to have been converted since 1994;
- 3.3.1.2. HCV AREAS including RARE, THREATENED OR ENDANGERED SPECIES and areas where HCVs are known to have been destroyed since 1999;
- 3.3.1.3. Areas known to have been subject to ILLEGAL LOGGING (including ENCROACHMENT) since 1994;
- 3.3.1.4. High Carbon Stock (HCS) areas, including those known to have been destroyed since 1994;
- 3.3.1.5. LAND COVER/ USE;
- 3.3.1.6. COMMUNITIES known or suspected to have suffered HARM with nature of HARM noted (See also R1.5.2).

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3.3.2. Maps and inventories of THE COMPANY GROUP AND ITS WOOD SUPPLIERS' PAST and current status in all IMPACT AREAS, PEER REVIEWED by INDEPENDENT EXPERTS, reviewed by the REMEDIATION GOVERNANCE BODY and assessed by THE FSC THIRD-PARTY VERIFIER, within **X months** of the ORGANIZATION-SPECIFIC ROADMAP being agreed, including:

- 3.3.2.1. NATURAL FOREST including areas known to have been converted since

- 1994;
- 3.3.2.2. HCV AREAS including RARE, THREATENED OR ENDANGERED SPECIES and areas where HCVs are known to have been destroyed since 1999;
 - 3.3.2.3. Areas known to have been subject to ILLEGAL LOGGING (including ENCROACHMENT) since 1994;
 - 3.3.2.4. High Carbon Stock (HCS) areas, including those known to have been destroyed since 1994;
 - 3.3.2.5. LAND COVER/ USE;
 - 3.3.2.6. COMMUNITIES known or suspected to have suffered HARM with nature of HARM noted (See also R 1.5.2).
- 3.3.3. Identified HARM recorded in a REGISTRY OF HARM, PEER REVIEWED annually by INDEPENDENT EXPERTS and the REMEDATION GOVERNANCE BODY for continuous learning and prevention of HARM and assessed by THE FSC THIRD PARTY VERIFIER. REGISTRY OF HARM includes:
- 3.3.3.1. Cases of HARM identified by the GRIEVANCE MECHANISM (U 1.3);
 - 3.3.3.1.1. Documentation and records of CONFLICTS are reviewed for presence of HARM.
 - 3.3.3.2. Cases of HARM identified by due diligence systems (U 1.8 & U 1.9)
 - 3.3.3.3. Cases of HARM identified by the mapping and inventory process (see 3.3.2 [3.3.2]);
 - 3.3.3.4. Maps of all areas where HARM has occurred, distinguishing between types of HARM including HARM due to PfA violations (taken from data produced for 3.3.2 [3.3.2])
 - 3.3.3.5. Identification and the recording of root causes that have led to the HARM.
- 3.3.4. Assessment of REGISTRY OF HARM and prioritisation of cases for REMEDY OF HARM, with particular consideration of SALIENT HUMAN RIGHTS ISSUES and SALIENT ENVIRONMENTAL ISSUES (see 1.8 HRDD & 1.9 EDD in Section U) within **Y months/year**, PEER REVIEWED by INDEPENDENT EXPERTS, reviewed by REMEDIATION GOVERNANCE BODY, and assessed by THE FSC THIRD PARTY VERIFIER. **[NB: Discussion point & key area needing further development: See [Guidance for options relating to prioritisation](#)]**
- 3.3.5. INDEPENDENT MONITORING reports on progress of identification and prioritisation of HARM with public summaries published annually.

Requirement:

3.4. REMEDY OF HARM process

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall develop procedures to REMEDY HARM.

Performance Indicators:

- 3.4.1. REMEDY procedures developed with the participation of RIGHT-HOLDERS and other relevant STAKEHOLDERS, within **X months/year** of the Remediation Framework agreed by REMEDIATION GOVERNANCE BODY, PEER REVIEWED and assessed by THE FSC THIRD-PARTY VERIFIER, that is a general REMEDY OF HARM process, that includes:
 - 3.4.1.1. RESTORATIVE PRACTICES as a first choice to find appropriate REMEDY OF HARM in dialogue with RIGHTS-HOLDERS (and where applicable, other STAKEHOLDERS), with specific details determined on a case by case basis;
 - 3.4.1.2. RIGHTS-HOLDERS and other STAKEHOLDERS informed in a culturally

appropriate manner of the GRIEVENCE MECHANISM (see [U 0.8]), how to access it and of THE COMPANY GROUP'S commitment to respect RIGHTS and REMEDY HARM;

- 3.4.1.3. RIGHTS-HOLDERS given RESOURCED ACCESS to INDEPENDENT ADVISORS, and other support needed for participation in the REMEDY process;
- 3.4.1.4. STAKEHOLDER identification mapping of all groups, actors, agencies and others that have either power, RIGHTS, interest or all of these in relation to the situation that needs to be REMEDIED;
- 3.4.1.5. Careful consideration of the physical and temporal space that the REMEDY process/dialogue will happen in; final locations and timings agreed with RIGHTS-HOLDERS and other STAKEHOLDERS;
- 3.4.1.6. Representation of all relevant STAKEHOLDERS and the active application of approaches to redress power imbalances;
- 3.4.1.7. Professional specialist support is made available for the process as a whole and tailored to the specific needs of RIGHTS-HOLDERS, the personnel of the COMPANY GROUP AND ITS WOODS SUPPLIERS and all other involved STAKEHOLDERS;
- 3.4.1.8. INDEPENDENT OBSERVERS allowed to participate in INDEPENDENT MONITORING of implementation of agreements for REMEDY OF HARM;
- 3.4.1.9. Participatory evaluation progress reporting on the implementation of REMEDY PROCESS AGREEMENTS and progress towards and implementation of agreements for REMEDY OF HARM, including RIGHTS-HOLDER and STAKEHOLDER satisfaction with progress and the production of public summaries.
- 3.4.1.10. Corporate reporting on COMPANY/COMPANY GROUP/SUPPLIERS' progress on addressing UNACCEPTABLE ACTIVITIES and the REMEDY OF HARM.

3.4.2. INDEPENDENT MONITORING reports on progress of REMEDY OF HARM processes with public summaries published annually. **Stakeholder Consultation Point**

3.4.3. REMEDY PROCESS AGREEMENTS with RIGHTS-HOLDERS (and where applicable, other STAKEHOLDERS) mutually agreed.

Requirement:

3.5. Pilot cases

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall pilot cases for REMEDY OF HARM.

Performance Indicators:

- 3.5.1. **X** pilot cases chosen with the participation of RIGHTS-HOLDERS, other STAKEHOLDERS and INDEPENDENT EXPERTS from cases involving both priority SALIENT HUMAN RIGHTS ISSUES and SALIENT ENVIRONMENTAL ISSUES for assessment and REMEDY OF HARM, reviewed by the REMEDIATION GOVERNANCE BODY and assessed by THE FSC THIRD-PARTY VERIFIER **within X months/year** of the ORGANIZATION-SPECIFIC ROADMAP being agreed.
 - 3.5.1.1. An overall balance of types and situations of HARM in pilot cases including both environmental and social issues.
- 3.5.2. REMEDY OF HARM process procedures detailed in 3.4 [3.4] applied to the pilot cases **within X months/year** of the ORGANIZATION-SPECIFIC ROADMAP being agreed.

- 3.5.3. REMEDY PROCESS AGREEMENTS with RIGHTS-HOLDERS - and in the case of environmental REMEDY: key STAKEHOLDERS - mutually agreed within X months/year of the ORGANIZATION-SPECIFIC ROADMAP being agreed. **Stakeholder Consultation Point**
- 3.5.4. RIGHTS-HOLDERS - and in the case of environmental REMEDY: key STAKEHOLDERS - satisfied with the progress made to REMEDY HARM and towards signed agreements for REMEDY OF HARM.
- 3.5.5. Signed specific and time-bound agreements for REMEDY OF HARM mutually agreed with RIGHTS-HOLDERS - and in the case of environmental REMEDY: key STAKEHOLDERS. **Stakeholder Consultation Point**
- 3.5.6. INDEPENDENT MONITORING reports on progress of assessment and REMEDY OF HARM of the pilot cases with public summaries published annually. **Stakeholder Consultation Point**
- 3.5.7. Fully developed and revised working methodologies for assessment (3.3 [3.3]) and REMEDY OF HARM (Sub-sections RS and RE) and related procedures (3.4.1 [3.4.1]) in place, following experience from completion of pilot cases, reviewed by the REMEDIATION GOVERNANCE BODY, PEER REVIEWED and assessed by THE FSC THIRD PARTY VERIFIER, prior to ENDING DISASSOCIATION.

Requirement:

3.6. Transparency and demonstration of progress

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall demonstrate progress. It shall disclose information required for the assessment of implementation to the REMEDIATION GOVERNANCE BODY, THE FSC THIRD-PARTY VERIFIER REMEDIATION GOVERNANCE BODY and for PEER REVIEW.

Performance Indicators:

Stakeholder Consultation Point

- 3.6.1. THE FSC THIRD PARTY VERIFIER receives for publication on the REMEDIATION PROGRESS DEMONSTRATION WEBSITE:
- 3.6.1.1. Current working methodology for REMEDY OF HARM or at minimum a flowchart demonstrating the methodology;
 - 3.6.1.2. Map methodology summaries and maps as outlined in 3.3.1 and 3.3.2.
 - 3.6.1.3. Public summaries of:
 - 3.6.1.3.1. INDEPENDENT MONITORING reports and any other independent reports on progress on the identification of HARM;
 - 3.6.1.3.2. Participatory evaluation progress reporting on progress of REMEDY OF HARM processes.
 - 3.6.1.3.3. INDEPENDENT MONITORING reports on progress of the pilot cases, published annually.
- 3.6.2. THE COMPANY GROUP ORGANIZATION-SPECIFIC ROADMAP website (or website area) publishes as a minimum:
- 3.6.2.1. Current working methodology for REMEDY OF HARM or at minimum a flowchart demonstrating the methodology;
 - 3.6.2.2. Procedures to allow INDEPENDENT OBSERVERS to participate in INDEPENDENT MONITORING of REMEDY processes, agreements and their implementation.

3.6.2.3. Public summaries of:

3.6.2.3.1. INDEPENDENT MONITORING reports and any other independent reports on progress on the identification of HARM;

3.6.2.3.2. Participatory evaluation progress reporting on progress of REMEDY OF HARM processes.

3.6.2.3.3. INDEPENDENT MONITORING reports on progress of the pilot cases, published annually.

Section RS – Remedy of Social Harm

4. REMEDY of social HARM from UNACCEPTABLE ACTIVITIES

Stakeholder Consultation Point

Requirement:

4.1. REMEDY social HARM

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall REMEDY social HARM from PAST violations of the RIGHTS of RIGHTS-HOLDERS

Performance Indicators:

- 4.1.1. Priority cases (R3.3.4) identified and addressed appropriately over time ([link to 5 lines timescale](#)).
- 4.1.2. Pilot sites prioritised for REMEDY OF HARM (R3.5).
- 4.1.3. Implementation of process for the REMEDY OF HARM (R3.4).
- 4.1.4. Root causes that lead to the HARM analysed and discussed during REMEDY OF HARM discussions/process between the parties.
 - 4.1.4.1. Action planned to address root causes.
- 4.1.5. PfA specific SALIENT HUMAN RIGHTS ISSUES (*NB these not developed yet*) and resultant HARM specifically addressed or appropriately scheduled to be addressed where such cases are not considered priority cases (scheduling of such cases takes place prior to ENDING DISASSOCIATION). [Stakeholder Consultation Point](#)
- 4.1.6. REMEDY PROCESS AGREEMENTS with RIGHTS-HOLDERS (and where applicable, other STAKEHOLDERS) mutually agreed.
- 4.1.7. INDEPENDENT MONITORING reports on progress of identification and prioritisation of HARM and REMEDY OF HARM processes and progress published annually.
- 4.1.8. RIGHTS-HOLDERS satisfied with the progress made to REMEDY HARM and towards signed agreements for REMEDY OF HARM.
- 4.1.9. Signed specific and time-bound agreements for REMEDY OF HARM mutually agreed with RIGHTS-HOLDERS.

Requirement:

4.2. Transparency and Demonstration of Progress

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall demonstrate progress. It shall disclose information required for the assessment of implementation to the REMEDIATION GOVERNANCE BODY, THE FSC THIRD-PARTY VERIFIER and for PEER REVIEW.

Performance Indicators:

Stakeholder Consultation Point

4.2.1. THE FSC THIRD PARTY VERIFIER receives for publication on the REMEDATION PROGRESS DEMONSTRATION WEBSITE:

4.2.1.1. Stakeholder consultation placeholder

4.2.2. THE COMPANY GROUP ORGANIZATION-SPECIFIC ROADMAP website (or website area) publishes:

4.2.2.1. Public summaries of:

4.2.2.1.1. INDEPENDENT MONITORING reports and any other independent reports on progress of implementation of the REMEDY OF HARM;

4.2.2.1.2. INDEPENDENT MONITORING reports on progress of the pilot cases, published annually.

4.2.2.1.3. Participatory evaluation progress reporting on the progress of the REMEDY OF HARM process;

4.2.2.2. COMPANY GROUP AND ITS WOOD SUPPLIERS public reporting on progress addressing HUMAN RIGHTS issues and the REMEDY OF HARM.

4.2.3. THE COMPANY GROUP ORGANIZATION-SPECIFIC ROADMAP website (or website area) publishes as a minimum:

4.2.3.1. Public summaries of INDEPENDENT THIRD PARTY ASSESSED health and safety practices.

Sub-section RE – Remedy of Environmental Harm

5. REMEDY of environmental HARM from UNACCEPTABLE ACTIVITIES

Requirement:

5.1. REMEDY environmental HARM

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall REMEDY environmental HARM including from PAST UNACCEPTABLE ACTIVITIES.

Performance Indicators:

- 5.1.1. Priority cases (Section R 3.3.4) identified and addressed appropriately over time (*milestones needed here*).
- 5.1.2. Pilot sites prioritised for REMEDY OF HARM (Section R 3.5).
- 5.1.3. Implementation of the REMEDY OF HARM process (Section R 3.4).
- 5.1.4. Root causes that lead to the HARM analysed and discussed during REMEDY OF HARM discussions/process between the parties.
 - 5.1.4.1. Action planned to address agreed root causes.
- 5.1.5. PfA specific SALIENT ENVIRONMENTAL ISSUES (*NB these not developed yet*) and resultant HARM specifically addressed or appropriately scheduled to be addressed where such cases are not considered priority cases (scheduling of such cases takes place prior to ENDING DISASSOCIATION). *Stakeholder Consultation Point*
- 5.1.6. Development of landscape and site conservation and restoration plans (5.2 below).
- 5.1.7. RIGHTS-HOLDERS and other STAKEHOLDERS satisfied with the progress made to REMEDY HARM and towards signed agreements for REMEDY OF HARM.
- 5.1.8. Signed specific and time-bound agreements for REMEDY OF HARM, including via conservation and restoration plans (see 5.2 and 5.3), mutually agreed with RIGHTS-HOLDERS and where appropriate, other STAKEHOLDERS.

Requirement:

5.2. Landscape-level conservation and restoration plan

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall identify and select areas of NATURAL FOREST and HCVs that it shall conserve and restore and it shall develop a landscape-level conservation and restoration plan to deliver this. *Stakeholder Consultation Point*

Performance Indicators:

- 5.2.1. Pilot sites prioritised for plan development and implementation (see Section R

3.5).

5.2.2. A landscape-level conservation and restoration plan to REMEDY the PAST impact of THE COMPANY GROUP AND ITS WOOD SUPPLIERS developed with the participation of RIGHTS-HOLDERS, and other STAKEHOLDERS reviewed by the REMEDATION GOVERNANCE BODY, PEER REVIEWED and assessed by THE FSC THIRD-PARTY VERIFIER, that includes:

5.2.2.1. Areas PROPORTIONATE to the total area of:

5.2.2.1.1. Natural forest converted since 1994; and/or

5.2.2.1.2. HCVs destroyed since 1999 by THE COMPANY GROUP AND ITS WOOD SUPPLIERS' FORESTRY OPERATIONS; and/or

5.2.2.1.3. ILLEGAL LOGGING within THE COMPANY GROUP AND ITS WOOD SUPPLIERS' MANAGEMENT UNITS;

5.2.2.1.4. Where mapping and inventory data is lacking, estimations of PAST HARM using a methodology developed based on best available information to date made by INDEPENDENT EXPERTS.

5.2.2.2. Areas for conservation and restoration PROPORTIONATE to total IMPACT AREA made up from:

5.2.2.2.1. The maintenance and enhancement of EQUIVALENT HCVs to the areas destroyed by THE COMPANY GROUP AND ITS WOOD SUPPLIERS' PAST FORESTRY OPERATIONS;

5.2.2.2.2. The restoration of the actual or EQUIVALENT areas to those impacted by UNACCEPTABLE ACTIVITIES;

5.2.2.3. The prioritization of areas and activities and respective timelines with priority given to areas inside THE COMPANY GROUP AND ITS WOOD SUPPLIERS' MANAGEMENT UNITS and areas PROXIMATE to the IMPACT AREAS within the connected and impacted landscapes and with a selection criterion of likelihood of conservation and restoration success;

5.2.2.4. Selected sites and activities meet the definitions of ADDITIONALITY and LONGEVITY.

5.2.3. The landscape-level conservation and restoration plan ensures:

5.2.3.1. No CONVERSION of NATURAL FOREST or DESTRUCTION OF HCVs and significantly decreased likelihood in the conservation and restoration areas;

5.2.3.2. No MAJOR INFRASTRUCTURE throughout the conservation and restoration areas.

5.2.4. CONSULTATION with RIGHTS-HOLDERS, other STAKEHOLDERS, the public and INDEPENDENT EXPERTS on the landscape-level conservation & restoration plan.

5.2.5. Landscape-level conservation and restoration plan revised as a result of CONSULTATION.

5.2.6. The revised landscape-level conservation and restoration plan reviewed by the REMEDATION GOVERNANCE BODY, PEER REVIEWED and assessed by THE FSC THIRD-PARTY VERIFIER.

Track Requirement:

5.3. Site conservation and restoration plans

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall develop, pilot and implement conservation and restoration plans at the site level.

Performance Indicators:

- 5.3.1. Site conservation and restoration plans developed with the participation of RIGHTS-HOLDERS and CONSERVATION AND RESTORATION PARTNERS for all conservation and restoration areas, based on the landscape-level conservation & restoration plan, for THE COMPANY GROUP AND ITS WOOD SUPPLIERS
 - 5.3.1.1. Site conservation and restoration plan priorities identified based on participation of RIGHTS-HOLDERS and CONSERVATION AND RESTORATION PARTNERS;
 - 5.3.1.2. Site conservation and restoration planning process and plan revised in light of feedback from pilot processes (see Section R 3.5).
- 5.3.2. Site conservation and restoration plans and priorities PEER REVIEWED and consulted with RIGHTS-HOLDERS and STAKEHOLDERS, then assessed by THE THIRD PARTY VERIFIER.
- 5.3.3. Policies and procedures to implement the site conservation and restoration plans in place, reviewed by the REMEDIATION GOVERNANCE BODY and assessed by THE FSC THIRD PARTY VERIFIER
- 5.3.4. Signed agreements with CONSERVATION AND RESTORATION PARTNERS.
- 5.3.5. Completion of priority activities prior to ENDING DISASSOCIATION following the milestones and timelines in the agreed landscape-level conservation and restoration plan.
- 5.3.6. Completion of the remaining activities after ENDING DISASSOCIATION following the milestones and timelines in the agreed landscape-level conservation and restoration plan.
- 5.3.7. Annual progress reports.

Track Requirement:

5.4. Transparency and Demonstration of Progress

THE COMPANY GROUP AND ITS WOOD SUPPLIERS shall demonstrate progress. It shall disclose information required for the assessment of implementation to the REMEDIATION GOVERNANCE BODY, THE FSC THIRD-PARTY VERIFIER and for PEER REVIEW.

Performance Indicators:

Stakeholder Consultation Point

- 5.4.1. THE FSC THIRD PARTY VERIFIER receives for publication on the REMEDICATION PROGRESS DEMONSTRATION WEBSITE:
 - 5.4.1.1. A summary of the total area (including types of habitat) that needs to be REMEDIATED through restoration and conservation;
 - 5.4.1.2. The landscape level conservation and restoration plan and site conservation and restoration plans including maps.
- 5.4.2. THE COMPANY GROUP ORGANIZATION-SPECIFIC ROADMAP website (or website area) publishes:
 - 5.4.2.1. The landscape level conservation and restoration plan and site conservation and restoration plans including maps;

- 5.4.2.2. Agreements with CONSERVATION AND RESTORATION PARTNERS excluding confidential/sensitive information.
- 5.4.2.3. Public summaries of:
 - 5.4.2.3.1. INDEPENDENT MONITORING reports and any other independent reports on progress of implementation of the REMEDY OF HARM;
 - 5.4.2.3.2. INDEPENDENT MONITORING reports on progress of the pilot cases, published annually.
 - 5.4.2.3.3. Participatory evaluation progress reporting on the progress of the REMEDY OF HARM process;
- 5.4.2.4. COMPANY GROUP AND ITS WOOD SUPPLIERS public reporting on progress addressing environmental issues and the REMEDY OF HARM.

6. FSC Remediation Framework: Requirements and guidance specific to PfA policy element a:

Section a

Illegal logging and trade in illegal wood and forest products

Remediation Framework requirement sections that shall be implemented:

Section U

Section T

Section R and sub-sections RE and RS

Section a (This document)

NOTE: Where identification of environmental and social HARM processes (Section R 3.3.4) do not show the presence of HARM then the corresponding Remediation Framework requirement section (RS or RE) shall not be applicable.

Additional requirements specific to PfA policy element: a) Illegal logging & trade:

None

7. FSC Remediation Framework: Requirements and guidance specific to PfA policy element b:

Section b

Violation of traditional and human rights in forestry operations

Remediation Framework requirement sections that shall be implemented:

Section U

Section T

Section R and sub-sections RE and RS

Section b (This document)

NOTE: Where identification of environmental and social HARM processes (Section R 3.3.4) do not show the presence of HARM then the corresponding Remediation Framework requirement section (RS or RE) shall not be applicable.

Additional requirements specific to PfA policy element: b) Traditional and human rights:

Stakeholder Consultation Point

Section U

Universal requirements: Foundational Infrastructure, Principles and Procedures

Requirement:

7.1. (PfA b extension to U 1.4) Prevention of UNACCEPTABLE ACTIVITIES, re-occurrence and violations of the FSC Policy for Association

Additional performance Indicators for PfA-b:

- 7.1.1. Public and WORKER health protected through the protection of ENVIRONMENTAL VALUES that underpin the HUMAN RIGHT to health and well-being in COMPANY GROUP AND THEIR WOOD SUPPLIERS' OPERATIONS.
 - 7.1.1.1. THIRD PARTY ASSESSED health and safety practices developed and implemented that meet or exceed the ILO Code of Practice on Safety and Health in Forestry Work and ISO 45001.
 - 7.1.1.2. Damage to ENVIRONMENTAL VALUES and human health from CHEMICAL use is prevented and mitigated or REMEDIED where damage occurs.
 - 7.1.1.3. Potential risk of damage by uncontrolled spread of fires on infrastructure, forest resources and communities assessed and mitigated by management activities, including:
 - 7.1.1.3.1. A map of fire-prone areas and potentially affected communities.
 - 7.1.1.3.2. Management plans and activities that prevent the starting of manmade fires.
 - 7.1.1.3.3. Management plans and activities that build resilience in the forest system in order to prevent the uncontrolled spread of fires.

- 7.1.1.3.4. Fire early warning systems and mitigation procedures.
- 7.1.1.4. Greenhouse gas (GHG) emissions from OPERATIONS evaluated and steps taken to ameliorate impacts, including:
 - 7.1.1.4.1. Emissions measured and evaluated for scale intensity and risk of emissions on human health and wellbeing;
 - 7.1.1.4.2. Plans to reduce emissions within timescales that match national and international ambitions on GHG emissions reductions;
 - 7.1.1.4.3. Participation in partnerships and programmes with organizations leading in the reduction of GHG emissions in forestry and related industries.

8. FSC Remediation Framework: Requirements and guidance specific to PfA policy element c:

Section c

Destruction of high conservation values (HCVs) in forestry operations

Remediation Framework requirement sections that shall be implemented:

Section U

Section T

Section R and sub-sections RE and RS

Section c (This document)

NOTE: Where identification of environmental and social HARM processes (Section R 3.3.4) do not show the presence of HARM then the corresponding Remediation Framework requirement section (RS or RE) shall not be applicable.

Stakeholder Consultation Point

9. FSC Remediation Framework: Requirements and guidance specific to PfA policy element d:

Section d

Significant conversion of forests to plantations or non-forest use

Remediation Framework requirement sections that shall be implemented:

NB: Stakeholder Consultation Point – read this section with consideration of the questions below for 9.1.1 and 9.1.2

NOTE: Where identification of environmental and social HARM processes (Section R 3.3.4) do not show the presence of HARM then the corresponding Remediation Framework requirement section (RS or RE) shall not be applicable.

A: For ENDING DISASSOCIATION with SIGNIFICANT CONVERSION:

Section U
Section T
Section R & Subsections RS & RE
Section d (This section 9.1)

B: For pre-association with SIGNIFICANT CONVERSION:

Section U
Section T
Section R & Subsections RS & RE
Section d (This section 9.1)

C: For pre-association without SIGNIFICANT CONVERSION without CONVERSION and with other UNACCEPTABLE ACTIVITIES

Section U
Section T
Section R
Refer to other sections for application as needed for the specific case

D: For pre-association without SIGNIFICANT CONVERSION and with other UNACCEPTABLE ACTIVITIES and CONVERSION

Section U
Section T
Section R
Section d (This section 9.2)
CRP – *(relevant sections – to be clarified)*
Refer to other sections for application as needed for the specific case

E: For pre-association without SIGNIFICANT CONVERSION and without other UNACCEPTABLE ACTIVITIES and with CONVERSION since 1994

REMEDATION FRAMEWORK not applicable:

For pre-association without SIGNIFICANT CONVERSION and where there are no other PfA UNACCEPTABLE ACTIVITIES – use the **CRP only** (i.e. it is not a PfA case therefore the REMEDIATION FRAMEWORK does not apply).

Additional requirements specific to PfA policy element: d) Significant conversion:

Sub-sections RE & RS
Remedy of environmental and social harm
Additional requirement for PfA-d: 9.1. REMEDY HARM from significant conversion of forests (that led to disassociation from FSC) Stakeholder Consultation Point <u>THE COMPANY GROUP AND ITS WOOD SUPPLIERS</u> shall <u>REMEDY HARM</u> from <u>PAST</u> significant conversion of forests to plantations or non-forest use.
Additional performance Indicators for PfA-d: 9.1.1. Implementation of the REMEDIATION FRAMEWORK Sections U T or R and Sub-sections RE (Remedy of environmental harm) and RS (Remedy of social harm) (remade into an ORGANIZATION-SPECIFIC ROADMAP) and where applicable FSC Conversion Remedy Procedure: 9.1.1.1. Application of REMEDIATION FRAMEWORK Sections U T or R and Sub-sections RE (Remedy of environmental harm) and RS (Remedy of social harm) for 5 year period preceding the SIGNIFICANT CONVERSION (scope includes SUPPLIERS); 9.1.1.2. Application of the CRP for all other CONVERSION since 1994 that is not SIGNIFICANT CONVERSION (scope excludes SUPPLIERS).
OR alternate indicator: 9.1.2. Implementation of the REMEDIATION FRAMEWORK (scope includes SUPPLIERS) for SIGNIFICANT CONVERSION and all other CONVERSION and since 1994.
Additional requirement for PfA-d: 9.2. REMEDY pre-association HARM from conversion of forests Stakeholder Consultation Point <u>Where there is no SIGNIFICANT CONVERSION THE COMPANY GROUP</u> shall <u>REMEDY HARM</u> from <u>PAST CONVERSION</u> since 1994 of forests to plantations or non-forest use.
9.2.1. Implementation of the FSC Conversion Remedy Procedure instead of REMEDIATION FRAMEWORK Sub-section RE (Remedy of environmental harm) and RS (Remedy of social harm).

10. FSC Remediation Framework : Requirements and guidance specific to PfA policy element e:

Section e

Introduction of genetically modified organisms in forestry operations

NOTE: Discussions on GMO under FSC Focus Forests project need to take place to inform this section of the Remediation Framework

Remediation Framework requirement sections that shall be implemented:

Placeholder – more discussion needed

Section U

Section T

Section R and sub-sections RE and RS

Section e (This document)

NOTE: Where identification of environmental and social HARM processes (Section R 3.3.4) do not show the presence of HARM then the corresponding Remediation Framework requirement section (RS or RE) shall not be applicable.

Additional requirements specific to PfA policy element: e) GMOs:

- *Forthcoming – stakeholder and FSC member discussion needed*

11. FSC Remediation Framework : Requirements and guidance specific to PfA policy element

Section f

Violation of any of the ILO Core Conventions

Stakeholder Consultation Point

Remediation Framework requirement sections that shall be implemented:

Section U

Section T

Section R and sub-section RS

Section f (This document)

NOTE: Where identification of environmental and social HARM processes (Section R 3.3.4) do not show the presence of HARM then the corresponding Remediation Framework requirement section (RS or RE) shall not be applicable.

Additional requirements specific to PfA policy element: f) ILO:

Section U

Universal requirements

Requirement:

11. (PfA f extension to U 1.4) Prevention of UNACCEPTABLE ACTIVITIES, re-occurrence and violations of the FSC Policy for Association

Additional performance Indicators for PfA-f:

11.1.1. Compliance with the ILO Core Conventions indicated by:

- 11.1.1.1. Workers are not impeded or hindered from establishing or joining worker organizations of their own choosing.
- 11.1.1.2. The Organization does not demonstrate an intolerance for the full freedom of worker organizations to draw up their own constitutions and rules.
- 11.1.1.3. The Organization does not demonstrate a lack of respect for or hinder the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or the rights of workers.
- 11.1.1.4. The Organization has not discriminated against or punished workers for engaging in lawful activities related to forming, joining or assisting a worker organization or choosing not to.
- 11.1.1.5. The Organization has not failed to negotiate in good faith¹ with lawfully established worker organizations and/or worker organizations' duly selected representatives with an aim to reach a collective bargaining agreement.

¹ ILO has extensive case law defining different interpretations of good faith in different situations. From the Extract of ILO Judgement 2152: "The requirement of good faith dealings is a two-way street. While staff members are under no obligation to assist the administration in any actions the latter may wish to take against them, they do have a duty not to so conduct themselves as to deliberately frustrate normal dealings with their employer. The latter is entitled to assume that the employees will receive and accept written communications sent to them in the normal course of affairs. [...]"

- 11.1.1.6. Where they exist, collective bargaining agreements have not been ignored and/or their implementation impeded.
- 11.1.1.7. The Organization's employment and occupation practices are demonstrably non-discriminatory.
- 11.1.1.8. The Organization does not utilize involuntary employment relationships (e.g., relationships that are not based on mutual consent) or work forced by the threat of penalty.
- 11.1.1.9. The Organization does not utilize forced or compulsory labour practices, including but not limited to:
 - 11.1.1.9.1. physical or sexual violence
 - 11.1.1.9.2. bonded labour
 - 11.1.1.9.3. withholding wages, including payment of employment fees and/or payment of deposit to commence employment
 - 11.1.1.9.4. restriction of mobility or movement
 - 11.1.1.9.5. retention of passports and identity documents
 - 11.1.1.9.6. threats of denunciation to relevant authorities.
- 11.1.1.10. Except where permitted by national laws, the Organization does not employ workers below the age of 15, or below the minimum age for light work as stated under national or local laws.
- 11.1.1.11. Persons under the age of 18 are not engaged in hazardous or heavy work.