



Forest Stewardship Council®



Public Consultation Report

FSC-POL-01-004 Version 3 Draft 4 *FSC Policy for Association*

FSC-PRO-10-004 Version 2 Draft 3 *Procedure for Disclosure Requirements for Association with FSC*



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Introduction

This report provides the responses to the public consultation of FSC-POL-01-004 Version 3 Draft 4 *FSC Policy for Association* and FSC-PRO-10-004 Version 2 Draft 3 *Procedure for Disclosure Requirements for Association with FSC*. The consultation ran from 4 October to 2 December 2021. FSC received 132 responses and 1,606 comments.

The report presents a summary of stakeholder feedback received during the public consultation and the analysis and conclusions on each topic. All the comments were analyzed and considered by the Policy for Association Technical Working Group. The main reasons to support or oppose and proposals for change presented in this report are in some cases summaries of several comments.

FSC-POL-01-004 *FSC Policy for Association* is an expression of the values shared by organizations associated with FSC. It defines unacceptable activities that associated individuals and organizations and their corporate group commit to avoid in both certified and non-certified operations.

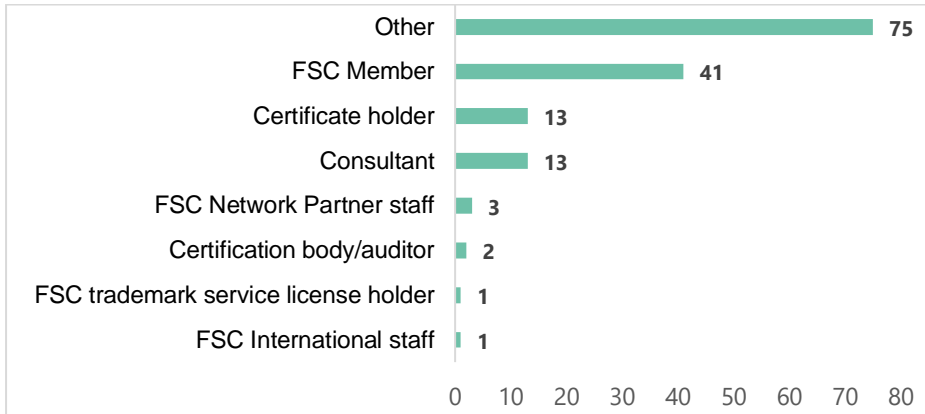
FSC-PRO-10-004 *Procedure for Disclosure Requirements for Association with FSC* describes the process used by FSC to screen applicants for conformance with the FSC Policy for Association, thereby minimizing the risk of establishing or maintaining an association with an individual or organization in violation of the FSC Policy for Association.

We are grateful to all respondents for your detailed and insightful feedback. Your input was invaluable in getting us to the next draft of this procedure.

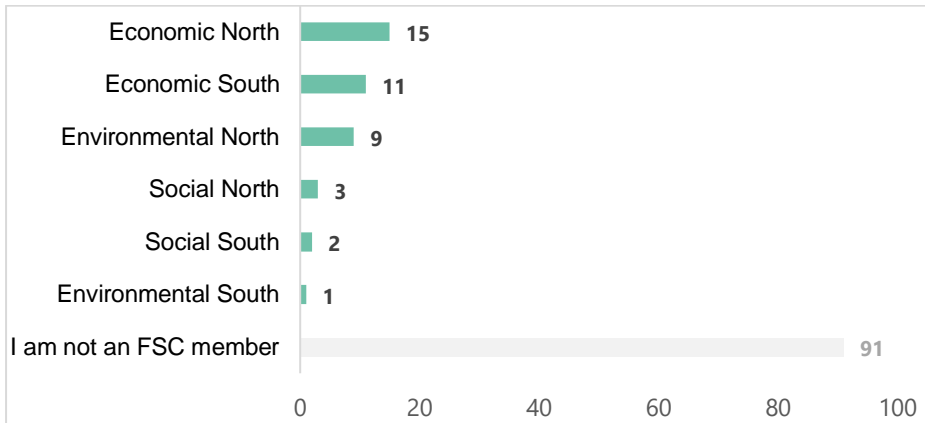
Who responded to the consultation?

There were **132** responses to the consultation.

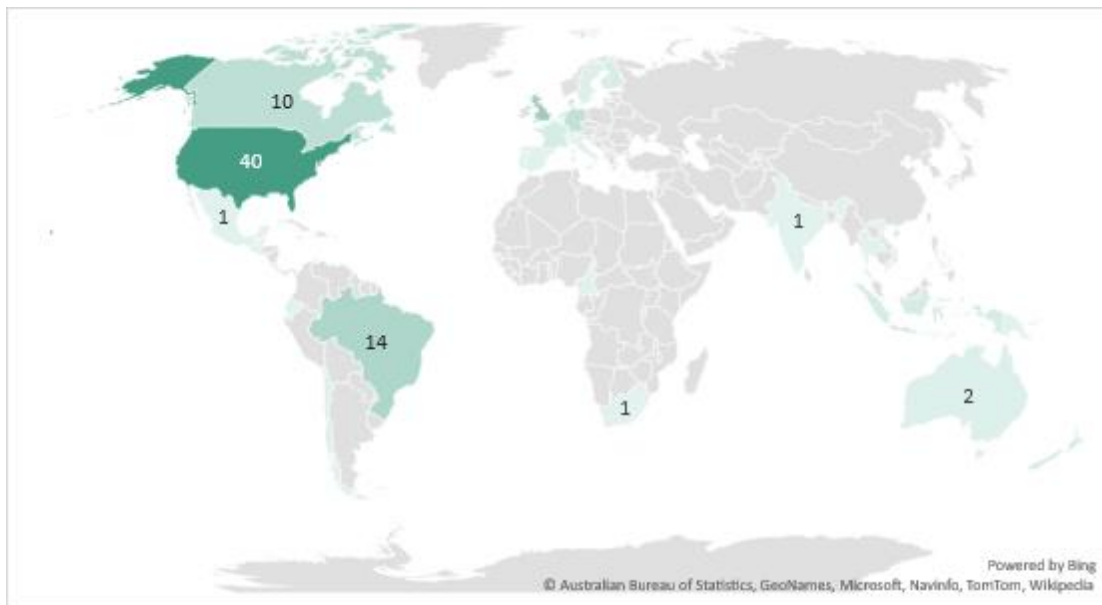
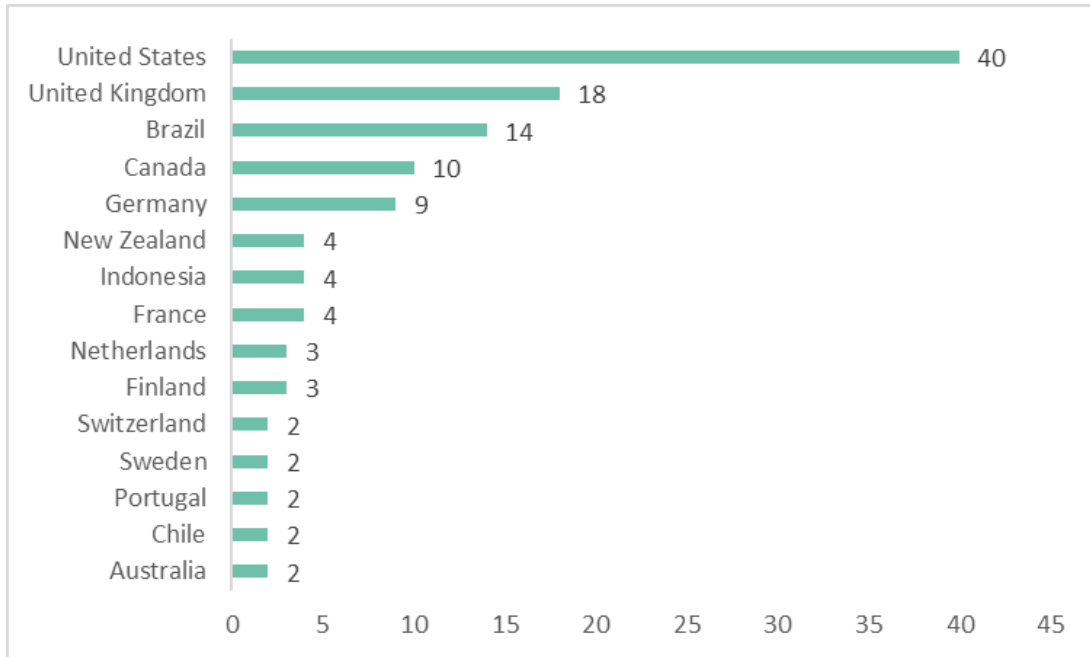
The largest respondent group was “other”. The relatively high number of respondents in this group stems from a campaign whereby individuals and civil society organizations were prompted to respond to the consultation to share their concerns with the use of genetic engineering. The campaign was international but mainly active in North America.



Of the members who responded, most were from the **Economic chamber**:



The top 5 countries by number of respondents were **USA, UK, Brazil, Canada, Germany**:



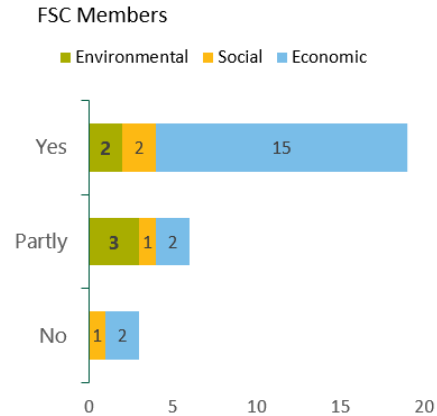
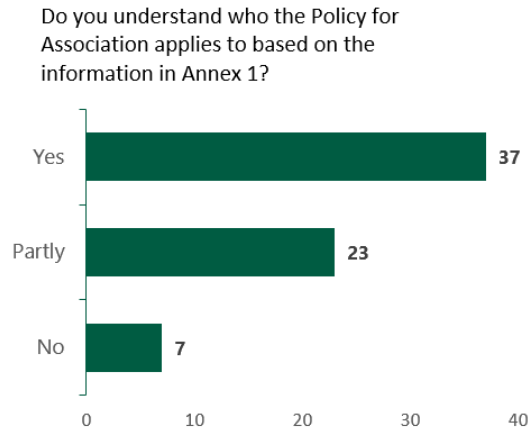
Response summaries by topic

This section summarizes the consultation responses to the main changes proposed in the revised procedure and how the feedback has been considered by the Technical Working Group in the final draft.

1. Who the Policy for Association applies to

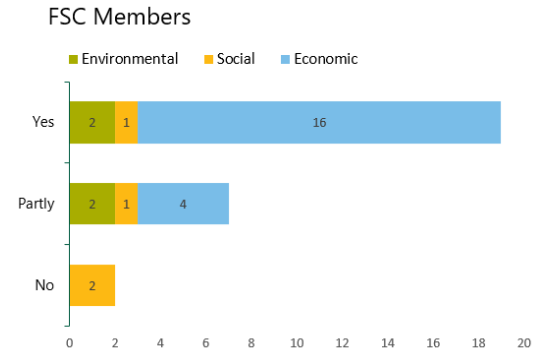
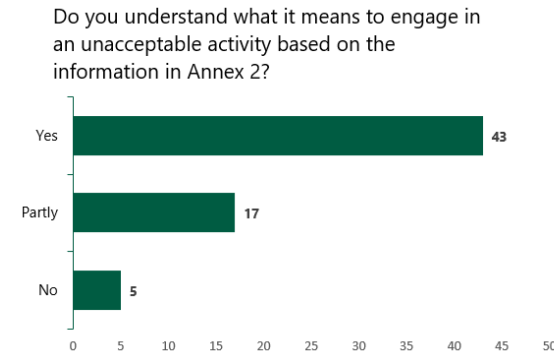
Corporate Group

For 55% of respondents and 68% of members it is clear who the Policy for Association applies to



Engaging in unacceptable activities

For 66% of respondents and 68% of members it is clear what is meant by engaging in unacceptable activities



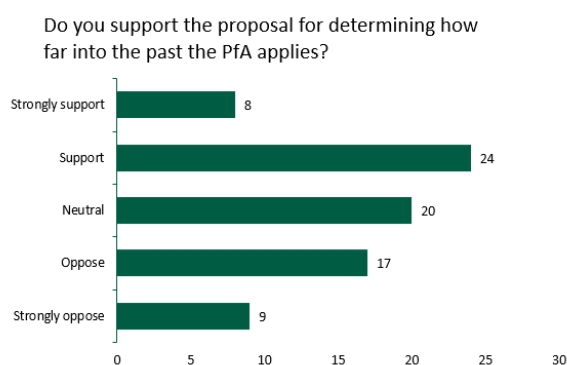
Proposal summary	TWG assessment
1. Policy should clearly state that organization's violations do not automatically mean disassociation for the whole corporate group and to all its associated entities	The PfA is intended to work on the corporate level and indeed the consequence of violation in any part of the group would mean sanctions for the whole group. Limiting sanctions on part of the group has not been adopted. Circumstances and actions to

	correct and remedy are considered as part of the decision-making process which could lead to continued association with timebound conditions.
2. Expand the definition to include situation where the organization has benefitted from sourcing material from a supplier that has been committing unacceptable activities even when they do not have control of those supplier activities or are in the position to influence it. This would expand the reach of PfA.	The scope of PfA includes suppliers that are controlled by the organization. TWG considers the current expansion in scope (from ownership model to control) to capture majority of cases and to be sufficient for the time being. Feasibility of expanding even further would be problematic from operational and technical perspectives.
3. Clarify "Family Control" question in Annex 1 so that belonging to the same family as such does not necessarily mean controlling relationship.	The wording has been adjusted so that family relationship as such does not automatically mean defining companies belonging to the same group.
4. Note is not useful. It harkens back to the old definition of "control" and is therefore confusing.	The note refers to using majority ownership as means of assuming a controlling relationship. This is used as a pragmatic method to increase feasibility of the new approach and considered a useful clarification.
5. Group certificates should be considered/included.	There is a confusion of these two concepts: corporate group and group certificate. Group certification is a way for more than one operation to be certified under a single FSC certificate - either Forest Management or Chain of Custody. The certificate is held by one organization or person on behalf of the group. While corporate group is defined by the ownership. There can be one or more FSC certificates.
6. Remove the case of being the sole supplier defining a controlling relationship.	This situation was used only as part of an example in Annex 2 and not as a determining factor for identifying controlling relationship.

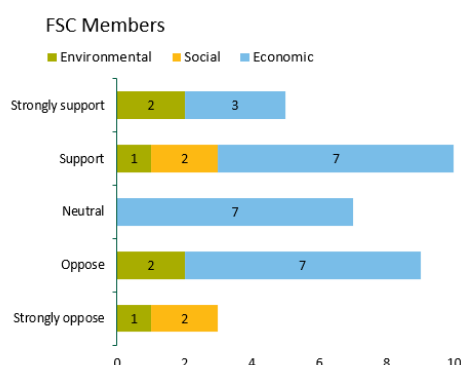
2. How far back the Policy for Association applies

41% of respondents and 44% of members **support** the proposal for determining how far into the past the FSC Policy for Association applies.

Main reasons to support:



Main reasons to oppose:

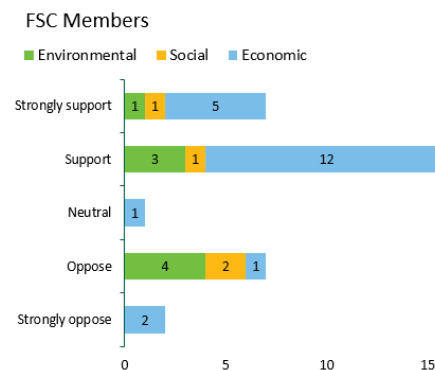
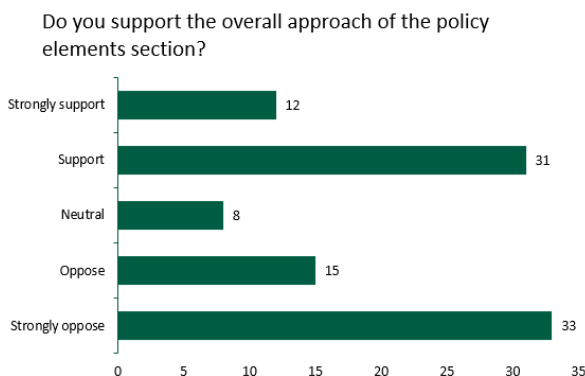


- Past actions may also serve as an indicator for lack of care regarding environmental or social impacts or sustainable forestry
- The use of conditions to allow flexibility is the right way to do
- Lingering harm is a good substitution which also addresses a behavioral pattern
- PfA should apply to violations that occurred in the past and prior to the effective date of the Policy
- The timeframe should be determined through assessment against a methodology which considers certain factors
- Existing certificate holders should be at least encouraged to remedy their past violations

Proposal summary	TWG assessment
7. Include a criterion related to the corporate group's history of involvement in unacceptable activities. In case the organization has a history of violating FSC rules, the timeframe should go longer in the past.	This aspect is considered in the decision concerning whether association with conditions is possible or if the organization needs to be excluded from the system.
8. Despite the "lingering harm" part, timeframes appear to go back potentially forever which contradicts some other parts of FSC standards for CH applicants themselves	The PfA does not present all timelines of when concepts were introduced to FSC system concerning different aspects of unacceptable activities, but they are considered as part of the assessment. The intent is not to go beyond those timelines.
9. Develop fixed criteria or operationalize the criteria to reduce risk of subjective decision making.	More detailed operational criteria should be developed overtime with experience from case assessments.

3. Policy elements

43% of respondents and **70%** of members **support** the overall approach of the policy elements section. **48%** of respondents overall and **27%** of members **oppose** the approach.



Main reasons to support:

- It is generally clear and concise

Main reasons to oppose:

- There is no justification for the FSC to allow any activities relating to GM trees (most commonly provided reason and mainly by the group "other")

- "Significant" conversion is not strong enough with regard to upcoming legislation on deforestation-free supply chains

Proposal summary	TWG assessment
10. FSC must add that it is able to proactively investigate and act on a potential PfA breach without a complaint being filed by a stakeholder.	This feature is a part of the Procedure for Disclosure Requirements for Association with FSC.
11. Is there a reference as to who covers the costs of complying with the roadmap?	Yes, Annex 4. Clause 6 of the FSC-PRO-01-009 Processing FSC Policy for Association Complaints: 'The organization commits to reimbursing the costs of the complaint investigation process and to compensating the costs of the process of ending disassociation.'
12. Is there a mechanism that can be used to protect FSC from legal action if an organization disagrees with the assessment of a violation?	Yes, it is a part of the Procedure for Disclosure Requirements for Association with FSC. Besides, there is an alignment with the Legal team on this matter.
13. In 5.2 there is the lack of clarity of "general requirements" or main pre-conditions.	5.2 was revisited, made clearer. Applying for association after confirmed violation and remedy process were added.
14. Could FSC show a chart with the inter relatedness of PfA, conversion remedy procedure, and remediation framework, for FSC stakeholders to properly assess whether there are gaps or omissions or loopholes in what is being proposed?	The chart will be shared during the public consultation.

4. Unacceptable activities: Illegal harvesting or illegal trade in forest products

Proposal summary	TWG assessment
15. Illegality should include corruption, fraud, bribery, tax evasion and collusion.	The definition of illegal trade includes these aspects already. For this version, bribery and fraud were added but the list presented is not exhaustive.
16. Make it clear that this also applies to FM, CoC and CW	The PfA already applies to all associated organizations which is clearly stated in the policy, first time in the first sentence of the introduction.
17. When FSC mentions "forest products" related to the unacceptable activities, are you referring to final products such as pulp and paper, for example, or are forest-specific products?	A definition for "forest product" was added: Forest product: Forest-based organic materials and products produced within a forest matrix, including wood and non-timber forest products. (Source: Adapted from definition of forest based in FSC-STD-40-004 V3-1 Chain of Custody Certification.)

5. Unacceptable activities: Violation of traditional or human rights within the forestry or forest products sector

Proposal summary	TWG assessment
18. Review and strengthen the definition of	The terms 'traditional' and 'customary' rights

traditional rights to acknowledge that they are also known as customary rights and/or indigenous rights/Change traditional rights into customary rights.	have been used interchangeably in FSC documents. In the PfA 'traditional rights' has now been replaced with 'customary rights' to align with the FSC's Principles and Criteria and the PfA Remedy Framework.
19. Violation of traditional rights must specifically include forest practices and harvest scale/scope that interferes with Indigenous peoples' inherent rights to engage food economies in forest landscapes	All these aspects are included and are already covered within the definition.
20. Modify to include violation of traditional/customary or human rights within any sector, not just forestry.	The scope of all the unacceptable activities for PfA have been defined with the focus on the core activities and sectors that are related to the mission of FSC. It is possible that reputational risks could be imposed through other sectors or activities as well. These could be dealt with through more general tools, such as the trademark license agreement that includes sections on reputational damage caused.

6. Unacceptable activities: Violation of workers' rights and principles defined in the ILO Declaration on Principles and Rights at Work within the forestry or forest products sector

Proposal summary	TWG assessment
21. Include all operations in the scope of the unacceptable activity.	The scope of all the unacceptable activities for PfA have been defined with the focus on the core activities and sectors that are related to the mission of FSC. It is possible that reputational risks could be imposed through other sectors or activities as well. These could be dealt with through more general tools, such as the trademark license agreement that includes sections on reputational damage caused. This activity is now aligned with other unacceptable activities when it previously was the only unacceptable activity with undefined boundaries.
22. Reference to the FSC Core Labour Requirements is more appropriate than reference to the ILO Declaration	FSC Core Labour Requirements are based on ILO Core Conventions, and FSC-accredited certification bodies audit the generic criteria and indicators based on ILO Core Conventions. Based on stakeholder feedback on the first public consultation of PfA in 2021 in which the FSC Core Labour Requirements were used, the reference to the ILO Principles as the original source of the requirements was assessed as more appropriate one for use in the PfA.
23. Make it clear that this also applies to FM, CoC and CW	The PfA already applies to all associated organizations which is clearly stated in the

7. Unacceptable activities: Significant damage to high conservation values in forests

Proposal summary	TWG assessment
24. Damage may occur outside of forest areas such as in natural wetlands, shrublands or grasslands, particularly in forest landscapes that contain non-forest ecosystems. Remove 'in forests'.	The reference 'in forests' has been removed as part of alignment and inclusion of the HCV aspects into wider concept of 'conversion'. The activity refers now to "HCV areas" instead.
25. Why do we have long term here, if it is precluded from naturally reverting back? The text appears to indicate that both permanent and long term mean the same thing – permanent.	Removed 'precluded from naturally reverting back towards pre-conversion conditions', in line with Policy to Address Conversion.
26. The explanatory notes under the definition of "significant damage to high conservation values" - The identification of HCVs in all the domains of the corporate group is a precondition for the definition of mitigation strategies. How am I supposed to set mitigation strategies for HCVs that I have not even recorded existence?	The note intends to clarify that a specific systematic approach is not expected here across all operations ongoingly. The existing tools referenced give guidance and help to determine where and with which aspects more detailed evaluation would be needed and helpful to avoid violations.
27. It is unclear where the threshold is for significant damage to HCVs to be deemed "non-temporary". This could allow for significant degradation and or loss of HCVs, which could ultimately be non-temporary, but had initially been allowable as presented as temporary.	Temporary is explained in two sections of definitions as changes that a) do not negatively and permanently impact the values and b) as e.g., selective harvesting followed by regeneration in accordance with reduced impact technics. Degradation could be a process where other factors would be considered to determine a violation, such as existence of the attributes that constitute the values (as defined in the significant conversion).

8. Unacceptable activities: Significant conversion of natural forests to plantations or non-forest use

Proposal summary	TWG assessment
28. The terminology should fully align with Policy to address Conversion.	The terminology for 'conversion' has now been fully aligned with the FSC Policy to Address Conversion.
29. Remove the "significant conversion" and make the threshold stricter for PfA violation. Any conversion should be considered significant.	The TWG concluded that considering that the application scope of the PfA (entire corporate group) is very different than the scope of certification (defined land and operations), there is still a need to have a PfA specific threshold defined. This threshold is defined as "significant" conversion. The threshold has been made considerably tighter than the one in use currently for PfA. The major change has been to add a site level threshold in

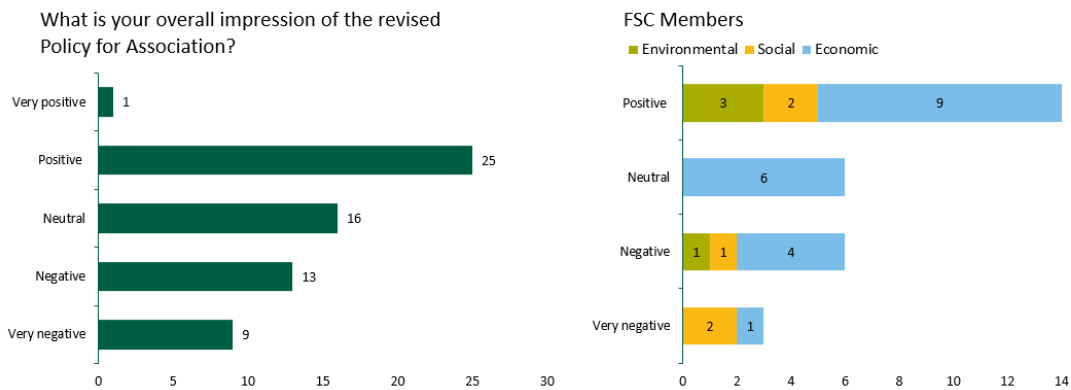
	addition to the corporate level threshold in use now.
30. This should also include conversion of HCV areas.	HCV areas have been added to the unacceptable activity as part of alignment with the Policy to Address Conversion alignment.
31. It is also not acceptable that organizations which converted more than 5 years before association should be considered conversion free. They should be required to remedy if they wish to associate for all conversion dating back to 1994.	Organizations that converted more than 5 years ago are not deemed as 'conversion-free'. 5 years is to be considered a calculation measure for the percentage of conversion within a management unit. For clarity, the reference to years has been removed from the threshold of 10.000 ha for the new draft. The current PfA is not limiting this strictly, there are variety of other factors that are also used to determine significant conversion and the years are used as a trigger to launch an investigation for potential PfA violation.
32. Organization should not be penalized if an organization from different sector conducts significant conversion.	PfA scope is to consider whole corporate groups as safeguard for reputational risks when associating with organizations. The expectation is that the whole corporate group is committed to the core values of FSC and avoids the unacceptable activities in all of their operations.
33. Consider conversion in the light of national legislation and only cover illegal conversion.	Not in line with FSC's mission, legal conversion could also be unacceptable.

9. Unacceptable activities: Genetically modified trees

Proposal summary	TWG assessment
34. Do not change the requirements to that use of GMOs is allowed in the future.	In the current revision of the PfA the definition of the unacceptable activity pertaining to GE/GM trees and products has been aligned in accordance with the 2011 Interpretation which allows research on GE/GM trees to be conducted, including field testing in non-certified forests, under clear conditions and safeguards. With this revision FSC is neither changing its position regarding the commercial use of GE/GM trees and products, nor changing its principles and policies on the subject.
35. Prohibit all GMO, including in research and field trials.	Use of GMOs are not allowed in the FSC system. Research and field testing have been allowed in the past and there is no change to this presented in the PfA draft. Any changes to FSC's approach to GMOs would require a dedicated membership discussion. This PfA revision only aims to reflect the existing approach.
36. Define and clarify research and field testing	A clarification concerning the alignment with the existing interpretation on research and field testing has been added to the version history. The definition has not been added at

10. General comments to Policy for Association

41% of respondents and 48% of members have a **positive impression** of the draft Policy for Association



Main reasons to support:

- Tackles key challenges and operational issues FSC is experiencing with current PfA rules.
- Structure, language and content is very clear and understandable.

There are thoughtful changes, and they are well explained.

Main reasons to oppose:

- The approach for corporate groups will substantially increase complexity for companies.
- The allowing of GM is unacceptable.
- Alignment with the Conversion and Controlled Wood is not addressed.
- The list of unacceptable activities is limited.

Proposal summary	TWG assessment
37. Make clear the policy element 'significant conversion'	Addressed above
38. PfA should be aligned to the Conversion Policy, not the other way around; it should also be aligned to Controlled Wood. It is expected the Remediation Framework is put out for consultation soon.	The latest drafts of PfA and Policy to Address Conversion have been aligned with each other and are using the same terms and definitions. Remediation Framework will be out for public consultation in March 2022, accompanied by the latest drafts of the PfA and Policy to Address Conversion to allow stakeholders to view the whole range of documents at the same time and to have a comprehensive picture of changes and how they interact with each other.
39. Revise the Spanish version, because the translation in some parts is not correct which can lead to confusion and lack of understanding if the English version is not used.	FSC will ensure the consistency and accuracy of the language versions of the next PfA draft.
40. The objective of the PfA should be to encourage organizations to participate	It is a great suggestion and was addressed in the Introduction. While it is FSC's

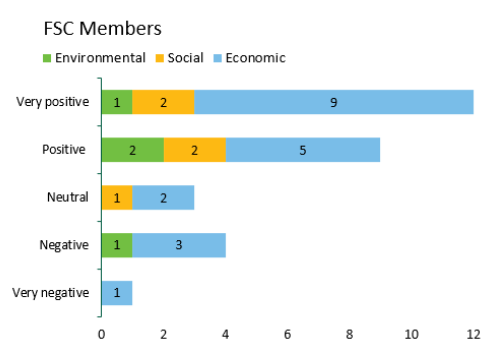
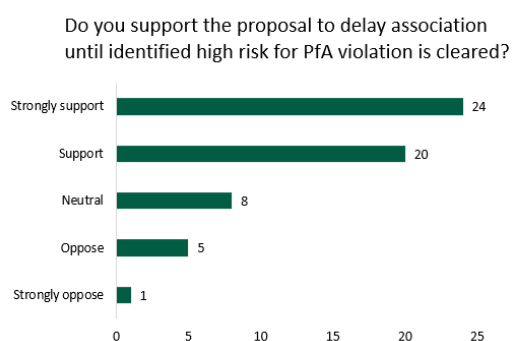
<p>in implementing Sustainable Forest Management (SFM) across forestry and forest product industry best practices.</p>	<p>mission to provide sustainable forest management solution, the objective of the PfA is to protect the credibility of FSC and thus carry out/accomplish its mission.</p>
<p>41. PfA should also include measures to prevent abuses of the logo and customers deception, like an empty certification.</p>	<p>FSC has several other tools to address misuses of the FSC trademark and false claims made in the system. This is outside the scope of this revision.</p>
<p>42. Do not shift the focus to remedy but disassociate first and then require remedy, not to allow for any negotiations and continued risk to FSC. Recommend that this text be revised to signal, for example: “To protect FSC’s reputation and to remedy harm caused by unacceptable activities, FSC will disassociate itself from all individuals, companies and their corporate groups who are found to be in violation of the PfA.”</p>	<p>Maintaining association with conditions is considered an essential avenue to provide and allow for quick course corrections and remedy for situations where these are assessed feasible. Procedural disassociations after each confirmed violation would not allow for those. The new criteria for maintaining association cases (FSC-PRO-01-009) and introduction of Remedy Framework clarifying expectations in this respect will ensure that the path is transparent and reduce need for case-by-case negotiations, mitigating risks in the processes.</p>
<p>43. Inconsistent use of the full reference to individuals, organizations or its corporate group. This needs to be checked and corrected in multiple points in the whole draft.</p>	<p>The references have been checked and corrected accordingly.</p>
<p>44. There are 3 kinds of timeframes involved in the PfA, and these must be separated and clarified: a) First there is the 1994 cut-off date, b) Next there is the new cut-off date, after which the Policy to Address Conversion AND the Policy for Association must accept no further conversion, c) there is the effective date of these policies, which should be the same for both policies, and therefore would be the date of the relevant vote at the 2022 session of the General Assembly.</p>	<p>The timelines are being aligned with the Policy to Address Conversion and there are also additional questions concerning this in the FSC Remedy Framework consultation. The PfA draft proposes that the new PfA is applicable to everyone from the effective date, towards end of 2022 to allow for equal treatment. The cut-off date of 2021 is only applicable to eligibility for certifying converted land after remedy, not to association.</p>
<p>45. Future Conversion: PfA should be aligned with the Conversion Policy. It is expected that the 2020 deadline for conversion will be approved to ensure that there are no incentives to deforestation prior to the effective date of the Policy. This deadline will apply regardless of when the policy comes into effect. The previous 2-0 version of the policy only remains effective for existing individuals, organisations and their associated corporate groups.</p>	<p>According to the Policy to Address Conversion proposal, land converted after December 2020 will not be eligible for FSC certification. It does not include a stand on possibility of a corporate group to associate with FSC in other ways, after required remedy. The PfA TWG has considered the thresholds for association together with planned remedy requirements to level the potential consequences of irrevocable disassociation with entire corporate groups. The thresholds have been adjusted accordingly as well. The TWG proposal is presented for the feedback as part of the FSC Remedy Framework consultation in FSC Consultation Platform March-April 2022.</p>

<p>46. Although the definition of "Association/Associated" does not include Promotional License Holders (PLHs) it may be misleading to say that "Any organization seeking to associate with FSC must undergo a screening process....." given that PLHs are not included. Suggest either to include PLHs or at least make it clearer that this relationship is not considered an association.</p>	<p>The term "associated" has been defined in the Terms and Definitions. PLHs have a different kind of role in the FSC system where they are not participating in the manufacturing process of the products and are therefore not included within PfA. This does not exclude use of other tools to screen and safeguard FSC's reputation in terms of relations with PHLs. The wording in the introduction has been changed to reflect that only defined type of association is included.</p>
<p>47. OBJECTIVE is still lacking a crucial aspect - namely the utilisation of or adherence to the precautionary principle as to avoid serious negative impacts to occur in the future due to current activities - and clarity with regards to the meaning of "severely" and who will determine what it is to mean.</p>	<p>The "severity" is being defined through the unacceptable activities and their respective definitions. Precautionary principle is best presented in the use of screening mechanism and related disclosure procedure. PfA itself operates more on the level of confirmed violations considering the severe consequences such violations could have both for FSC and the organization.</p>
<p>48. SCOPE. Suggest altering the last sentence of the last but final para of this section by adding "or similar activity" and thus to read: iv) whether there is a demonstrable systemic change to prevent the re-occurrence of the activity or similar activities. This is meant to be able to use the problematic activity carried out not only as an isolated act, but also as a possible indicator, or more importantly, to avoid abuse of a too narrow description of the activity that may give room for a future loophole.</p>	<p>This was not included as the focus was intended to address the unacceptable activities in question, rather than widening the scope. The unacceptable activities as such are already defined as wide range of activities and "the similar activities" could be considered to be already covered under each activity.</p>
<p>49. The last paragraph of the policy text is confusing. The language must be clarified or changed, to ensure that for new associations, after the effective date of the new policy, the new policy applies. Therefore, all violations involving the newly associated entity (using the new definition of control and responsibility), no matter when they occurred, must be judged by the new policy.</p>	<p>The intention has not been to apply the policy to new associates for their past activities. The reason for this has been to ensure same rules for organizations and to avoid complications where changes in the corporate group scope for example could result in an organization being classified in two different ways with different consequences for the same activity. However, there is an additional question concerning this aspect asked as part of the Remedy Framework consultation to gather more feedback on this aspect.</p>
<p>50. Include a statement of principle and intent and include why the policy is needed. Something like: The objective of the Policy for Association is to safeguard the integrity of FSC, establishing the fundamental conditions that an organization or natural person must meet in order to associate with FSC. The Policy defines which activities are considered unacceptable - due to</p>	<p>TWG considers that this has been already stated in the scope and introduction.</p>

their impact on forests, ecosystems and people – and therefore determines which organizations and natural persons can be associated with FSC.	
51. “Disputes should always be addressed at the lowest level possible “. This risk to add a loophole to prevent the policy to be enforced or to postpone indefinitely the enforcement, putting at risk the reputation of all organizations associates with FSC. Prescribing a mandatory complain with the perpetrator first and then with its certification body may put at serious risk FSC and its associates for years.	Subsidiarity principle, or principle of lowest level possible, is used as a core in the FSC dispute system. This is not a loophole but a system that allows for possibility for fast corrections and remedy. Only those cases that cannot be solved on the local level, should be escalated further. Complaint system in the certification system will be revised in a separate process and not as part of this process.
52. Are Group Members of a Group CoC an associated organization?	Yes, all group members are associated organizations covered by the same Trademark License Agreement and covered by Policy for Association.
53. Level of impact assessment is needed (potentially using a selection of case studies?) - to determine firstly what the level of CHs , even currently certified, would now fail on the basis of the timeframe criteria listed here (and potentially develop a clearer framework); and secondly, what the level of work required by FSC to do these assessments would be.	The comment refers to time criteria presented in the scope. Case studies would require information of violations that FSC does not have. Based on numbers of submitted PfA complaints, the time scope has not been very often a topic determining if a complaint is accepted or not, so the expectation is that this alone would not increase the number of violations significantly.

11. Disclosure procedure: Defining a process to screen applicants

76% of respondents and **72%** of members **support** the proposal to delay association until identified high risk for PfA violation is cleared



Main reasons to support:

- This approach is very much in line with the spirit of the PfA which is to avoid reputational problems. Much better not to associate initially than to address retrospectively, particularly given the risk to

Main reasons to oppose:

- Not clear enough how this should function in practice, especially with regard to new participating sites in COC groups certification model.

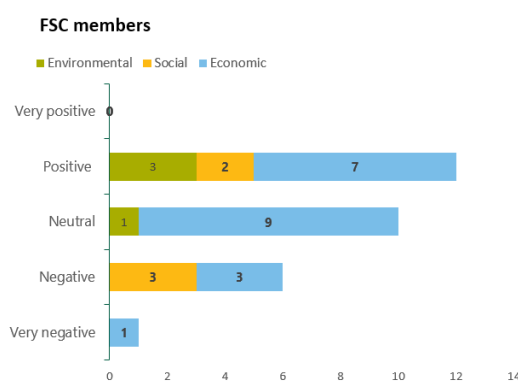
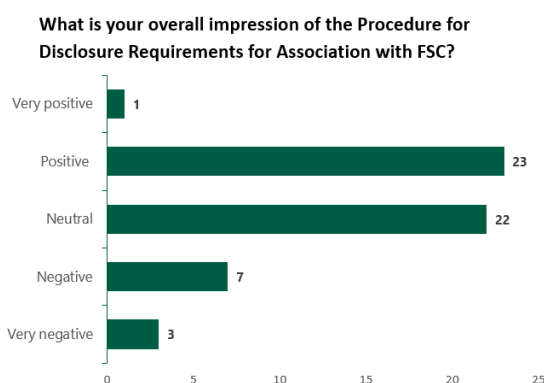
FSC. Ensuring FSC has sufficient resources allocated to review in a timely manner.

- Overall, this proposal is logical and prudent.

Proposal summary	TWG assessment
54. We don't agree to have this process carried out on a continuous basis, every re-certification or every "membership renewal".	Having only one evaluation upon the admission was not considered sufficient. Circumstances and organizations are in continuous change and there might be new risk factors that appear that were not present when the association initially took place. Therefore, there is a need for a regular screening in the future, although this is not part of the first implementation of the system. The membership 'renewal' is not part of the current process but could be implemented as regular update of disclosed information in the future on regular intervals.
55. 2.5 Clarify high-risk areas or high-risk sectors; How could FSC judge a risk mitigation measure of an approved NRA as unclear?	The intention is to possibly use NRAs as part of the set of tools to carry out the screening. The vision for the system would be a combination of different tools utilizing risk factors (NRA and others) which could then return a high risk for certain organization or operations. The exact parameters and combinations of them have not been determined yet but will be the next step in the development process.
56. 3.3 It doesn't seem ethical for FSC to initiate or continue evaluation when the organization has withdrawn its' application.	This sentence was removed as irrelevant.
57. Criterion E - the provision of unclear, incomplete, or inaccurate information can simply be a mistake, a lack of understanding of the information being asked, or a lack of expertise from the respondents.	This has already been captured in the process. If there is a high risk is identified, the first step is always to contact the organization to clarify if the risk can be cleared or if further steps are required. If it cannot be explained or cleared, we proceed into screening.
58. Association should not take place before at least an initial screening of applicants has taken place for all applicants.	According to the procedure, an individual or organization will not be able to associate with FSC until after the initial screening.

12. Disclosure procedure: General comments

43% of respondents and 41% of members have a **positive impression** of the draft Procedure for Disclosure Requirements for Association with FSC



Main reasons to support:

- This sets out a good initial screening procedure.
- Almost all aspects were touched to foster the FSC activities.
- It generally makes procedural sense for evaluating applicants.
- The automation is not in place yet, please do approve this policy before the IT-systems are ready

Main reasons to oppose:

- A screening process could greatly delay the certification process. Practicality and implementation are the challenges which should be thought through in advance of publication.
- We cannot consider it sufficiently developed to have provided full assessment as a procedure. It is very important that a process is developed to determine risk with clear criteria.
- FSC-PRO-10-004 is absolutely unnecessary.

Proposal summary	TWG assessment
59. It is great to see the Disclosure process being instigated but unless there is a very active and critical screening process it will still be up to stakeholders to make complaints.	Ensuring efficient screening will not only strengthen the association process and help assessing candidates more effectively, but also serve as an incentive for potential certificate holders by not delaying certification. Complaint system will remain as an additional and important avenue to identify violations but potentially one that is used less in the future.
60. Revise the Spanish version, because the translation in some parts is not correct.	FSC will ensure the consistency and accuracy of the language versions of the Disclosure Procedure.