



FSC-STD-01-001 Version 5-0 Draft 4-0

**Excerpt of Compilation of Comments for the
P&C Review Workshop of the 25th and 26th of June 2011**

16 June 2011

About this document

This is an excerpt of the compilation of all comments submitted on the online survey on Draft 4-0 of the revised Principles and Criteria. This document is aimed at facilitating the preparation and discussions of participants in the P&C Review Workshop of the 25th and 26th of June.

This excerpt provides comments by FSC members on those issues (based on the online survey), which received objections from either:

- 33% of the chamber, or
- 50% of one sub-chamber

These thresholds were established taking into account the voting thresholds for approving motions as the General Assembly – the approval of the P&C is subject to a vote by the FSC membership. In the case of a vote, the approval of motions requires the affirmative vote of both a simple majority of the voting power registered by associates in good standing in each chamber, and of 66.6% of the total voting power registered by associates in good standing (Section 15 of the FSC By-Laws).

The figures provided in the table below are based on the number of objections in relation to the total number of responses per question. The different weighting of the voting power of individuals (10%) and organizations (90%) was also taken into account in the calculation.

A conservative approach was taken in order to identify the issues proposed for discussion at the workshop. The assumption was that 33% or more of objection to the proposed wording within one chamber represents a significant risk of failing the 66.6% threshold as per the FSC By-Laws. As an additional safeguard it was assumed that 50% or more of objection within in one sub-chamber represents a significant risk of failing the requirement for a simple majority in the entire chamber.

Accordingly, the following 23 issues were identified.



Above 33% in Chamber
 Above 50% in Sub Chamber

S = Section of Preamble as per Draft 4-0
 C = Criterion as per Draft 4-0
 P = Principle as per Draft 4-0

	Econ North	Econ South	Both	Environ North	Environ South	Both	Soc North	Soc South	Both
S3	48.28%	19.29%	33.78%	70.20%	3.00%	36.60%	0.00%	22.50%	11.25%
C1.8	55.82%	6.00%	30.91%	24.00%	0.00%	12.00%	0.00%	0.00%	0.00%
C3.4	50.50%	18.00%	34.25%	0.00%	1.25%	0.63%	0.00%	0.00%	0.00%
C4.1	50.50%	6.43%	28.46%	9.50%	0.00%	4.75%	0.00%	0.00%	0.00%
C4.4	55.00%	25.71%	40.36%	0.00%	1.25%	0.63%	0.00%	32.50%	16.25%
C5.1	40.50%	25.71%	33.11%	49.67%	2.50%	26.08%	0.00%	0.00%	0.00%
C5.2	33.16%	6.43%	19.79%	53.77%	0.00%	26.89%	45.00%	20.50%	32.75%
C5.4	58.50%	19.29%	38.89%	19.29%	1.25%	10.27%	0.00%	18.00%	9.00%
C5.5	68.50%	56.43%	62.46%	51.65%	0.00%	25.82%	0.00%	0.00%	0.00%
P6	51.50%	20.77%	36.13%	59.58%	1.43%	30.51%	0.00%	18.00%	9.00%
C6.5	47.00%	15.00%	31.00%	61.67%	1.11%	31.39%	45.00%	0.00%	22.50%
C6.6	13.50%	24.55%	19.02%	71.67%	0.00%	35.83%	0.00%	20.50%	10.25%
C6.7	55.00%	22.50%	38.75%	49.67%	1.11%	25.39%	45.00%	0.00%	22.50%
C6.9	57.00%	22.50%	39.75%	17.86%	0.00%	8.93%	0.00%	18.00%	9.00%
C7.6	50.61%	30.00%	40.31%	47.37%	1.11%	24.24%	0.00%	18.00%	9.00%
P9	37.89%	0.00%	18.95%	67.98%	1.11%	34.55%	0.00%	4.00%	2.00%
C9.1	41.50%	7.50%	24.50%	63.33%	3.33%	33.33%	0.00%	18.00%	9.00%
C10.1	46.00%	22.50%	34.25%	33.81%	1.11%	17.46%	0.00%	0.00%	0.00%
C10.2	47.00%	32.73%	39.86%	48.33%	0.00%	24.17%	0.00%	18.00%	9.00%
C10.3	33.50%	40.91%	37.20%	49.67%	2.22%	25.94%	0.00%	18.00%	9.00%
C10.4	36.00%	40.91%	38.45%	30.00%	2.22%	16.11%	0.00%	0.00%	0.00%
C10.6	50.50%	54.09%	52.30%	6.43%	1.11%	3.77%	0.00%	0.00%	0.00%
C10.7	38.00%	32.73%	35.36%	44.85%	0.00%	22.43%	0.00%	18.00%	9.00%

The complete overview of objections to all sections of Draft 4-0 and more detailed analysis of the survey can be downloaded here: [Report on the Online Survey](#)

The complete compilation of comments can be downloaded from the P&C Review Section of the FSC website here: [FSC-STD-01-001 V5-0 D4-0 FSC Principles and Criteria](#).

The comments on the above issues including the comments on the glossary definitions pertaining to the issues are provided below.



Compilation of Comments

The following colors are used to differentiate submissions by sub-chamber.

Environmental North
Environmental South
Economic North
Economic South
Social North
Social South

Comments on Section 3 of the Preamble

In terms of products and services, the FSC P+C cover the production of ... products, conservation, (then insert RECLAIMED MATERIALS RECOVERY), protection, ...

We must recognize and document the import of recovered, recycled materials

- This section should include also semi-natural forests in the scope, as these are dominating in Nordic countries. Otherwise there is a big risk these forests will be classified as plantations which should make it impossible to continue regeneration in the traditional way. That would threaten the certified forestry as a whole in these countries.
- Do not include non-forest vegetation for certified forest companies to deal with. They are not in that business and they have chosen to get certified for the forest management. It can not be foreseen what this step would lead to, more than even more work and costs for the certified companies.
- It seems to us "ecosystem services and other use" is getting a higher rank in this P&C than the economic forestry. It is not credible to include also the sequestration and storage of carbon already before this is internally analysed. There are big differences in view on how the mitigation of climate change should be achieved and some groups say the forests shall not be cut at all. From our point of view the average productions shall be as high as possible at the same time as we work toward fulfilling high environmental goals. Forest products shall be chosen instead of plastics, aluminium etc. FSC have no scientific base for introducing carbon storage at this stage.
- We strongly object to the general tendency to minimise the importance of a strong economy in the certified companies. The focus in the P&C is obviously on other services. Without satisfying economic returns there are no certified companies.

Only natural forests or plantations are defined (Scope). The consequence of these definitions is that current silvicultural practices in the Nordic countries, Russia and North America will lead to conversion of natural forests to plantations. Proposal: Re-introduce the concept of semi-natural forests. Such forests should be characterized the maintenance of structures, ecological functions and species composition across forest generations typically found in



natural forests in the region.

Do not include non-forest vegetation for certified forest owners. FSC has to focus on forest certification. We have not seen any analysis of what this step would lead to, more than even more work and costs for the certified forest owners.

There should be more forest types that natural forest and plantations described. The work of the Plantation Group inside FSC should be acknowledged and at least a semi-natural forest should be included and explained in the glossary. As written, all silvicultural practices in the Nordic countries, Russia and North America etc could be considered to be plantations and thereby be equalised by short-time monocultural plantations in other regions.

Certification is broadened to include non-forest vegetation. The motivation behind this extension is elusive. Proposal: Agricultural land, pastures etc, not subject to forest management (and/or not legally classified as forest land), must be excluded or included on a voluntary basis.

The concept of Traditional Peoples requires a greater amount of explanation to ensure good understanding by National Working Groups. How many years is a "long established custom"? The definition is not helpful in this regard.

With the description of Natural Forest and Plantation, FSC has removed the critical category of semi-natural forest, such as is found across the northern hemisphere. It has been satisfactory for a decade in cases where forestry is not intensive enough to meet the previous plantation definition, for such forests NOT be considered a conversion. We strongly suggest the concept of semi-natural forests be re-introduced.

Scope. We object that FSC only define natural forests and plantations. There is a number of management systems used, and in most countries forests have been used commercially, or by local communities for centuries. Thus they cannot be categorised to either natural forests or plantations.

We object to the inclusion of non-forest vegetation. FSC is a Forest management standard, nothing else.

- Include also semi-natural forests in the scope, as these are dominating in Nordic countries. Otherwise there is a big risk these forests will be classified as plantations which should make it impossible to continue regeneration in the traditional way. That would threaten the certified forestry as a whole in these countries.

- Do not include non-forest vegetation for certified forest companies to deal with. They are not in that business and they have chosen to get certified for the forest management. It can not be foreseen what this step would lead to, more than even more work and costs for the certified companies.

- It seems to us "ecosystem services and other use" is getting a higher rank in this P&C than the economic forestry. To include also the sequestration and storage of carbon already before this is internally analysed is not credible. There are big differences in view on how the mitigation of climate change should be achieved and some groups say the forests shall not be cut at all. From our point of view the average productions shall be as high as possible at the same time as high environmental goals are strived for. Forest products shall be chosen instead of plastics, aluminium etc. FSC have no scientific base for introducing carbon storage



<p>at this stage.</p> <p>- We strongly object to the general tendency to minimise the importance of a strong economy in the certified companies. The focus in the P&C is obviously on other services. Without satisfying economic returns there are no certified companies.</p>
<p>Non forest vegetation should not be included in the FSC standard. The standard only defines natural forests and plantations. The wording implies that current silvicultural practices in the boreal zone are leading to conversion of natural forests to plantations. The management intensity differs by the power of ten, the ecological services are much greater in managed forests in the boreal zone than in typical plantations. Proposed wording: Introduce a third category of semi-natural forests characterized by maintenance of structures, ecological functions and species composition across forest generations typically found in natural forests in the region.</p>
<p>Ecosystem services or ecosystem function definition needs to be expanded to capture the concept of both abiotic and biotic inter-connectivity and harmony. For example:- the attributes of diversity (species,height, age, diameter and genetic makeup); the concept of dead wood; aerial and soil fragmentation. Section 6 - all issues of flexibility are recorded with future deliverables</p>
<p>I am not sure if it is either necessary or wise to single out Carbon as an ecosystem service. There are potential risks to FSC in tying ourselves too closely to forests as Carbon sinks when the arithmetic used by many organisations involved in carbon and climate change amelioration are questionable. I find the approach to conflicts between the standard and laws inadequate. Much more guidance is needed for CBs for this.</p>
<p>Unacceptable: Only natural forests or plantations are defined (Scope). The consequence of these definitions is that current silvicultural practices in the Nordic countries, Russia and North America will lead to conversion of natural forests to plantations. Proposal: Re-introduce the concept of semi-natural forests. Such forests should be characterized the maintenance of structures, ecological functions and species composition across forest generations typically found in natural forests in the region.</p>
<p>Certification is broadened to include non-forest vegetation (Scope). The motivation behind this extension is elusive. Proposal: Agricultural land, pastures etc, not subject to forest management (and/or not legally classified as forest land), must be excluded or included on a voluntary basis.</p>
<p>Only natural forests and plantations are included. That excludes the semi-natural silvicultural practices in for example the Nordic countries.</p>
<p>It is a risk in considering the carbon as the first/unique ecosystem service mentioned. The writing (for people not privy to the discussions of carbon within the FSC) can suggest that FSC give more value to the carbon than it really does. To me we have two better options a) to mention other ecosystem services along the carbon; or b) exclude this line.</p>
<p>La sección 3.3 es un requerimiento adicional que puede afectar a las comunidades en vez de privilegiar su participación en manejos de bosques de las empresas. El texto de esa sección debiera se mas sencillo poniendo en igualdad de requerimientos que un administrador no indígena. Se puede referir a que la contratación debe ser acorde a la legislación vigente tomando en cuenta las normas internacionales laborales de pueblos indígenas.</p>
<p>The scope covers only natural forests, plantation and other vegetation types. It should cover also other types of forests like boreal or semi-natural/planted forests. Or definitions of natural forests and plantations has to be reviewed.</p>



It is important to start the para recognising that the overarching goal is for FSC to maintain and restore forest ecosystems, and their ecological functions, services and processes, regardless what is being certified.
Lack of clarity regarding non-forest certification.
See comment above. there is a huge difference, for example between non-timber forest products harvested from natural forests and non-timber forest products grown in intensive agricultural monocultures. The FSC is losing site of its mission to protect the worlds forests, which by common usage people would rightly interpret to mean natural or semi natural forested areas.
lack of clarity on certification of non-forest ecosystems
Sec 3: "The scope of application of FSC-STD-01-001 FSC Principles and Criteria for Forest Management, includes natural forests*, plantations* and other (i.e. non-forest) vegetation types. The concept of „other vegetation types. should be limited to those land-uses involving the growing of trees but includes, in principle, „non-forest. land-uses as they contribute to the mission of FSC." At the very least, the preceding needs to be tempered with a very explicit recognition that the overarching goal, from an ecological perspective, is to maintain and restore natural forest ecosystems and their components and processes, regardless of what is being certified. Such a recognition is very important to guiding interpretation of the P&C. It will also help prevent very likely misinterpretation of the preceding as suggesting the FSC thinks it's OK to certify conversion of forests to plantations and non-forest.
Lack of clarity on certification of non-forest ecosystems
Lack of clarity on certification of non-forest ecosystems
Section 3 has a lack of clarity on certification in non-forest ecosystem
Lack of clarity on certification of non-forest ecosystems
S3 - It is important to start the para recognising that the overarching goal is for FSC to maintain and restore forest ecosystems, and their ecological functions, services and processes, regardless what is being certified.
needs clarity on scope that ensures FSC does not allow certification of systems that are not forests or in the forest zone contributing to the maintenance and restoration of natural forests. Need to give a list of exclusions, including palm oil and fruit orchards.
Don't agree with the inclusion of plantations into the general P & C. Plantations are not forests and they should not be treated as forests. By including them in the scope of the general P&C activities which are allowed in plantations ie clearfelling, can potentially also be applied to natural forests. They need to be treated separately.
Where it states "Where there might be situations of conflict between the FSC Principles and Criteria and laws, specific FSC procedures will apply." please clarify / refer to procedures that apply.
There is no explicit/clear reference to the role of FSC certification to contribute to the adaptation of climate change.
Mitigation of climate change is well mentioned but adaptation, that is becoming even more important, should be better and clearly specified
Adaptation shall specifically refers to the need of adapting to climate change
Section 3-Scope: I object to the use of the term 'non-forest' as falling within the potential scope of FSC because (1) this will raise hackles with many who will question why the Forest Stewardship Council is certifying 'non-forest' and (2) because it relies on some agreed upon definition of forest, of which there are many, and even more in development for carbon market objectives. For example, are 1000s of hectares of bamboo a forest? Or would that



<p>be a non-forest because bamboos are not trees? Bamboos may be certified by FSC but they are definitely grasses and huge stands of them are forests (of timber "grasses"), especially if they occur naturally (and fulfill ecological function of forests). Often, dense bamboo stands grow among broad-leafed trees over broad landscapes; those habitats are also considered forests.</p>
<p>I suggest the following simplified wording: "The concept of 'other vegetation types' should be limited to those land-uses involving the growing of trees but ALSO includes OTHER land-uses as they contribute to the mission of FSC.</p>
<p>Section 3 and 4 - grammatical error: "However" is used to begin a sentence; that is incorrect grammar. The word could easily be dropped completely in both cases.</p>
<p>Section 3: The following statement is ambiguous and confusing. The concept of „other vegetation types“ should be limited to those land-uses involving the growing of trees but includes, in principle, „non-forest“ land-uses as they contribute to the mission of FSC. Non-forest land uses that are associated with forests should be included, but not those that are not. This statement should reflect this concept.</p>
<p>b) Scope: Ver comentario en relación a concepción sobre pueblos tradicionales y auto-identificación.</p>

Comments on glossary definitions related to Section 3 of Preamble

Definition Forest

<p>- the definition should reference the concept of ecotype and the recognition of the attributes of a forest type.</p>
<p>The term forest needs to specify a minimum potential canopy height if this is not the case then many mature shrublands would be defined as forests.</p>
<p>this is about the most problematic and reductionist definition of a forest that could possibly be chosen and is creating huge environmental risks where it is being used under the UNFCCC. see for example, http://www.nature.com/news/2009/090819/full/news.2009.842.html. I would like to see this deleted.</p>
<p>The phrase "It does not include land used primarily for agriculture or urban use" should be removed from the forest definition. A forest could also be defined as "An ecosystem or assemblage of ecosystems dominated by trees and other woody vegetation".</p>
<p>There is no reference to the source of definition of "forest". We recommend specifying the source of the definition of this term</p>
<p>Bosque: Debe ser definido como un ecosistema, que incluye los otros componentes, no solo los árboles. En la forma en la que está definido, prácticamente se le diferencia de una plantación por el hecho de tener especies nativas ¡! Además en la versión al español se ha traducido land por "terreno", lo cual no es apropiado; debería decirse "tierra". Esto aplica a todas las definiciones en el Glosario que incluyen este término.</p>

Definition Natural forest (also relevant for Criterion 6.9)

<p>There must be also a definition of semi-natural forests as those are the totally dominant forest type in the Nordic countries. The definition of natural forests may not lead to all semi-natural forests are defined as natural or plantations.</p>



<p>There must be also a definition of semi-natural forests as the dominate totally in the Nordic countries. The definition of natural forests may not lead to all semi-natural forests are defined as natural or plantations.</p>
<p>integrate the 'Clarification' piece into the definition and call it FSC Natural Forest. It is confusing in understanding c. 6.8 what the definition of natural forest and Plantation in a FSC context actually is (in a temperate forest setting).</p>
<p>Very important to also define semi-natural forest.</p>
<p>There must be also a definition of semi-natural forests as the dominate totally in the Nordic countries. The definition of natural forests may not lead to all semi-natural forests are defined as natural or plantations.</p>
<p>Natural forest definitoin should refer to a minimum height for hte mature vegetation.</p>
<p>definition should include reference to using biome based approach in setting natural forest definitions for national, regional and local standards. Definition should clearly distinguish between natural and semi-natural conditions and incorporate these distinctions into the P&C. Missing reference to the components found in highly natural forests as reference, including structure, complexity and diversity found in current definition.</p>

Definition Plantations (also relevant for Criterion 6.9)

<p>It is extremely important not to get the Nordic forests classified as plantations, though they are semi-natural, often with a mix of planted and naturally regenerated trees. Define the semi-natural forests.</p>
<p>It is extremely important not to get the Nordic forests classified as plantations, though they are semi-natural, often with a mix of planted and naturally regenerated trees. Define the semi-natural forests.</p>
<p>do not agree with the proposed revision to the defintion of plantation. The defintion of plantation must not include areas planted in indigeous species where, in combination with natural regeneration on a site, there is a natural range of species. Even if there are only a few. The original definition provided this and would be preferred.</p>
<p>I am extremely concerned with the new plantation definition in the 4th Draft of the FSC P&Cs. This definition is a hugh change from the existing one and has an enormous affect on present and future FSC certifications in Canada and the United States. Many of the planted stands in these northern regions did not meet the old definition of a plantation and now they do. This is a big problem for Forest Companies and Certifying Bodies. In most cases under this new definition companies will not be able to meet Criteria 6.9 and 6.10 that deals with converting natural forest to plantations. There is nothing wrong with planting trees to meet all kinds of long term timber and ecological objectives on a Management Unit. Both criteria state that it must be done on “a very limited portion of the area of the Management Unit”. This contradicts good forestry and greatly increases costs to meet these long term objectives; the cost benefit of being FSC certified would be gone. At J.D. Irving, Limited we will not be able to meet these criteria in Canada, where we have been seeking FSC certification, and we will likely lose our existing FSC certificate in Maine USA.</p>
<p>I urge FSC International to reconsider changing the plantation definition. The old definition was effective at distinguishing the difference between planted stands that have key elements of native ecosystems and ones that do not. This is an important ecological distinction that needs to remain in the FSC standard for it to keep its gold star rating.</p>
<p>Very important to also define semi-natural forest. Do not classify the Nordic forests as</p>



plantations.
It is extremely important not to get the Nordic forests classified as plantations, though they are semi-natural, often with a mix of planted and naturally regenerated trees. Define the semi-natural forests.
Plantation/Natural forest - those are 2 extremes and it is not clear where belongs so called semi-natural forests: artificially regenerated but with natural ecosystem elements due to long life time/rotation period. Original definition of plantations more acceptable.
- there is a new and an old still in the draft. The new states "areas newly established by planting or seeding with native (indigenous) tree species which are characterized by few species and even spacing and/or even-ages" - this is in conflict with definition of natural forest - many temperate coniferous forests are restocked by planting with just a few species
The change in the Plantation definition is good.
Why are both new and original definitions on this list? I presume the new one is the one that will be referred to.

Definition Management unit

It is difficult for us to understand why areas outside the spatial area should be included.
Why should areas outside the spatial forest area be included.
We have hard to see why areas outside the spatial area should be included.
The definition should be changed to include sties outside that are used 'largely' as opposed to 'solely'.
Re Management Unit and Management Plan definitions - These help, but I think need to be even more clear if possible. Many organisations (eg state forests in Eastern Europe) have Management Plans at different levels: National, Regional, District, and forest level (could possiby even argue Compartment level). The reason it is key to be clear is that group and multi-site sampling could vary wildly depending at what level is decided to be the Management Unit. If a state forest manager was successful in arguing that the Management Unit level was National, the sampling a CB would do would be very different to if it was determined at forest level. Suggest Management Unit is what is under a Management Plan which is the document that meets the requirements of Principle 7.

Definition Traditional peoples

We feel unclear about this definition. Are there any examples as guidance?
This is hard to interpret under Swedish circumstances and needs further explanation!
Who has the right to claim this status? Examples are required.
We feel unclear about this definition. Are there any examples as guidance?
remove (it becomes Indigenous want to be) thus confusing and imflamatory



Comments on Criterion 1.8

<p>This is also an example of a bureaucratic criterion. This commitment is clear once an Organization applies for certification. Why do we as a FSC certified company holding a valid certificate that is publicly available at the FSC website have to demonstrate by another statement the commitment to the P&C? This criterion is not needed.</p>
<p>This could be an issue for some BC companies as they may not be able to certify all tenures under their management in 2 years. The explanatory notes state that companies must then certify the remaining tenures to FSC Controlled Wood Standard, and comply with the Partial Certification of Large Ownerships, which is unclear about requirements for both FSC members and non members.</p>
<p>The requirement for extra documentation is an example of an overly bureaucratic approach that adds little to the FSC mission. The commitment is clear once an Organization decides to apply for certification.</p>
<p>Criterion 1.8 should specify that not all land under "managerial control" has to be FSC certified.</p>
<p>As written, these criterias have more the form of indicators/verifiers. There must be some space for national initiative to distinguish the important verifiers to uphold the criterias.</p>
<p>Even with the current definition - "managerial control" still is not clear to me. Based on the explanatory notes it sounds like any other organizations affiliated with the certified business would have to be at least implementing controlled woods standards. If this is so, I think it could be an issue as some affiliated businesses (i.e. sister companies) may have no associated values with COC certification but may be forced into a costly controlled wood format even though they produce no certified lumber.</p>
<p>This is yet another example of bureaucratic measures. Reduce text.</p>
<p>This is also an example of a bureaucratic criterion. Why do we as a FSC certified company holding a valid certificate that is publicly available at the FSC website have to demonstrate by another statement the commitment to the P&C? This criterion is not needed.</p>
<p>It is overly bureaucratic to request this information. The committment is clear once the organization decides to become certified and no other committment documents should be necessary.</p>
<p>Very challenging: The requirement for extra documentation (1.8) is an example of an overly bureaucratic approach that adds little to the FSC mission. The commitment is clear once an Organization decides to apply for certification.</p>
<p>Criterion 1.8 could only be fulfilled (shall demonstrate) if the Organization implemented certification over all the management units under its control. The intent of certification is to independently confirm the quality of management within a defined forest area. Principle 1 is not the place to deal with legitimate concerns over greenwashing. This concern needs to be addressed through global, national and regional policies and mechanisms and through management of the FSC trademark.</p>
<p>the words 'adhere to' do not reflect what is stated in the notes. perhaps 'achieve and adhere to' would better reflect the notes.</p>
<p>I remain concerned about the effect and ability to actually meet 1.8, 4.4, 4.6 and 5.4. While the explanatory notes assist the actual intent of these Criterion remain unclear or have the potential to be interpreted in a way that could make them impossible to meet.</p>
<p>This is an example of an overly bureaucratic approach that adds little to the FSC mission. The commitment is clear once an Organization decides to apply for certification.</p>



It might be difficult for smallholders and some communities to uphold a website for public availability.

Suggestion: "The Organization shall demonstrate that measures are taken, by the Organisation and/or regulatory agencies, to effectively protect the Management Unit from unauthorized or illegal resource use, settlement and other illegal activities. "

This is good and extremely important language. It is crucial to maintain and improve upon existing C1.6, which is integral to the FSC's credibility. Existing C1.6 is too vague to be properly implemented, and this revision is a valuable step towards making it more clear and effective.

HOWEVER, note that we have SERIOUS concerns with Exp Note from prior draft: "Alternatively, those subordinate parts of The Organization that do not fully comply with the FSC Principles and Criteria,

- must comply with the requirements of the FSC Controlled Wood policy and procedures; and" This approach is not sufficient given the currently deeply flawed implementation of the controlled wood system, e.g., widespread decisions by companies and even NI's that entire regions and countries are "low risk" despite well known examples of portions of those countries and regions suffering from serious problems with conversion, HCV logging, etc. These problems are very serious and perhaps extensive in the U.S., and we suspect, elsewhere.

It might be difficult for smallholders and some communities to uphold a website for public availability. Suggestion: "... in a document made publically available, proactively or upon request depending on the scale of the organisation."

1.7 and 1.8 are too prescriptive. Specifically, this phrase is of concern in 1.7: "publicize a commitment not to offer or receive bribes in money or any other form of corruption". This phrase is of concern in 1.8: "a publicly available document made freely available." This level of detail could be considered for the Indicators or it should be arranged so that the public summary report of the certification assessment addresses and provides compliance with these requirements.



Comments on Criterion 3.4

This ILO Convention no 169 is not ratified by e.g. the government in Sweden. The criterion must include text saying the convention must be ratified to make the criterion applicable.
This ILO Convention no 169 is not ratified by e.g. the government in Sweden. The criterion must include text saying the convention must be ratified to make the criterion applicable.
To recognize and uphold ILO 169 is impossible in a country like Sweden where the convention is not ratified in national law. This also goes against C1.5. This will be crucial for us and this is the most important objection we have on this draft! There are huge differences between indigenous people in the different parts of the world and the Sami people in Sweden have all the rights, and even more, compared to the rest of the Swedish population. There are only a few of them that still lives and works in the traditional way, the majority are parts of the society where there are no separation between Sami and Swedes.
Proposal: Add text to address conflicts with national laws.
Seems redundant to 3.1, except it actually seems to extend the Organization's responsibilities beyond even the borders of their management unit, which is not realistic.
This ILO Convention no 169 is not ratified by e.g. the government in Sweden. The criterion must include text saying the convention must be ratified to make the criterion applicable.
Canada has not ratified the ILO Convention (169) on Indigenous and Tribal Peoples Convention, which could be problematic. Similar to 3.2, 'upholding' could require greater responsibility/ support and likely more work (cost) in the planning stages. Also, this may be problematic in BC where those rights are one element of negotiation during treaty settlement. The 'upholding' of 63 articles would be a significant increase in work.
Upholding ILO conventions that are not ratified by the country is a potential conflict with national law. This fact must be managed.
Unacceptable. ILO 169 is ratified by very few countries, and should not be forced upon these countries by FSC.
Sweden has not ratified ILO 169. The democratic process of ratifying laws are not for the organization to drive. Appliance of this criterion would be in conflict with current national laws. 3.6) Intellectual property is not a known term, thus the scale of compensation can not be considered.
Comment: Very challenging demand which in certain countries exceeds the legal requirements.
Aspects of 3.4, particularly article 26 of the UN Declaration fail to acknowledge that in some significant cases indigenous people (e.g. New Zealand's Maori) have long benefited from well established systems of legal redress and compensation for previous loss of lands. Further "rights" granted to land now privately owned (often for generations) simply creates new injustices.
Remission to additional document by the standard, creating standards within standards.
Suggestion: Inclusion of the required demands/concepts on the standard using the text of the criteria, instead of remitting to external documents.
Criterion 3.4 - This can be difficult/impossible to be orchestrated in national standards.
If recognise by the country

Comments on glossary definitions related to Criterion 3.4



Definition of Customary Law

We are unclear whether a customary law really may have the same legal status as statutory laws. Is it possible to develop this definition further?
We are unclear whether a customary law could have the same legal status as statutory laws. Please develop this definition further.
This is not clear enough!
Customary Law, Customary Rights: Need to provide significant context and examples to these definitions to ensure NIs have clear guidance.
Unclear, develop further.
We are unclear whether a customary law really may have the same legal status as statutory laws. Is it possible to develop this definition further?
Customary law requires interpretation applicable to the jurisdiction in question
Customary law - Definition is not very clear. Does customary law may have the same legal status as statutory laws? Is it possible to develop this definition further?
The Customary law definition is three paragraphs long and needs to be summarized into a concise definition. Wikipedia is not an appropriate source.

Definition of Customary rights

This is not clear enough!
too ambiguous; it is a valid concept however its use must be valid
Customary rights should retain the previous definition, the change effectively disenfranchises millions of stakeholders.
I am concerned about relations of customary rights to national laws. I would prefer if it would be more clearly indicated that customary rights go first (even if they contradict national laws. Traditional people customary rights can be perceived illegal in my country Russia as they contradict the new laws. I am also concerned about corruption fighting---we have informal relationships which in other countries can be labeled as corruption--would like to discuss more these issues at the Workshop prior GA
Derecho consuetudinario: Mejorar la definición; no se hace alusión a un aspecto fundamental que es el tiempo. Se debería incluir características relacionadas con el derecho consuetudinario indígena, que es más importante para efectos de su respaldo y ejercicio en los PyC.

Definition of Uphold

The expression "uphold" could be misunderstanding and be interpreted as a responsibility of the FMU for the rights, customs and culture of Indigenous people, even outside the scope or the reach of Management activities, since in the Glossary this word was interpreted also as support.
The expression "uphold" is unclear, not defining the FME specific responsibilities.



Comments on Criterion 4.1

<p>This is a far too high ambition. You shall have in mind that a bigger company in Sweden is conducting many thousands of loggings annually. It would cause an extremely high workload and cost to go through this routine on every site. There are already demands in the standard saying when consultations are needed. Do not introduce this criterion.'</p>
<p>Engagement implies a more thorough/ lengthy and consultative process. Identifying 'customary rights' adds another dimension and additional work for the tenure holder.</p>
<p>4.1, 4.2 and 4.5 The increased demand on engagement with local communities involve an unacceptable workload for the Organization. To secure a relevant approach, the level at which such engagement should be done must be decided by national initiatives based on regional context. Proposal: Include "proportionate to scale, intensity and risk" in the criterion.</p>
<p>4.1 Unacceptable that forest owners, especially SLIMF, should identify local communities access to and usage of forest resources.</p>
<p>4.1, 4.4 and 4.5 These criteria must be "Proportional to scale, intensity and risk", and open up for national initiatives to negotiate on a national level, since there are large differences in the role and status "local communities" have in different countries.</p>
<p>The bounds of "affected" in the first sentence are not clear. This is unauditible.</p>
<p>in the explanatory notes (item #3) for FMUs with large landbases and literally hundreds of potential land use or access rights it is nearly impossible to inventory these at one time. It needs to be made clear in the criterion or explanatoy notes that this can be done over a period of time and signs of progress are all that is required to conform. Some rights are nearly impossible to uncover until someone brings forth a lost document others never knew about!!!</p>
<p>This is not doable. We could not manage this workload.</p>
<p>4.1, 4.4, 4.5. These criteria will increase the workload for the certified organisation considerably. These texts will be prohibitive to local forest owners to become certified – uncertainties regarding their ownership are very negative. It is also extremely difficult to foresee which types of rights / claims that communities may have.</p>
<p>This is a far too high ambition. You shall have in mind that a bigger company in Sweden is conducting many thousands of loggings annually. It would cause an extremely high workload and cost to go through this routine on every site. There are already demands in the standard saying when consultations are needed. Do not introduce this criterion.'</p>
<p>4.1 Unacceptable: The increased demand on engagement with local communities (4.1, 4.4, 4.5 etc) may involve an unacceptable workload for the Organization. To secure a relevant approach, the level at which such engagement should be done must be decided by national initiatives based on regional context. Proposal: Include "proportionate to scale, intensity and risk" in the criterion.</p>
<p>4.1 only works if the definition of customary rights reverts to the previous definition. There are many plantation developments in Africa where I believe FSC has a duty to provide protection for local communities against government agencies who are 'selling' lands over which these communities have customary usage rights not established in either customary or statutory law. Under the present definitons these unethical developments can be immediatly FSC certified. Although note 1 makes this clear the definitons provide wriggle room.</p>
<p>rewrite so it is clearly, those that are directly affected by management activities.</p>



4.1 – don't object to this if my interpretation is the official interpretation which is that for a small privately owned wood if there are NO communities living in or affected by the management activities then the manager doesn't have to engage consult with whoever the nearest community is in order to satisfy this criterion.

Within 4.1 at what scale is "those that are affected by management activities" assessed? The case could be made that forest management activities can impact community economics at great distances due to the global nature of forest product markets.

Comments: On the whole, the wording of the criterion became usable and clear after the movement of the issues of relations with local communities and rights of workers to different principles. Nevertheless, "indigenous communities" should not be used to prevent confusion with the indigenous peoples covered in Principle 3.



Comments on Criterion 4.4

4.4 "engagement". Too vague.
It is not acceptable to demand a company should be forced to engage in other activities than those connected to the core mission for the company. For example a forest industry company shall not be forced to engage in local tourism.
Given the scale of BC's larger tenure holders, this could mean significant contributions to local communities, beyond that provided today. Could be problematic in times of poor markets as will result in increased costs. May not be a problem in all the resource towns in BC.
4.4 It is not acceptable to demand a company should be forced to engage in other activities than those connected to the core mission for the forest owner or company.
4.1, 4.4 and 4.5 These criteria must be "Proportional to scale, intensity and risk", and open up for national initiatives to negotiate on a national level, since there are large differences in the role and status "local communities" have in different countries.
4.1, 4.4, 4.5. These criteria will increase the workload for the certified organisation considerably. These texts will be prohibitive to local forest owners to become certified – uncertainties regarding their ownership are very negative. It is also extremely difficult to foresee which types of rights / claims that communities may have.
It is not acceptable to demand a company should be forced to engage in other activities than those connected to the core mission for the company. For example a forest industry company shall not be forced to engage in local tourism.
needs to include the caveat (an explanatory note?) that the requirement for implementing "additional activities" is triggered only where an Organization's operations result in a greater than minor negative impact on the social or economic well-being of a local community.
Criterion 4.4 is redundant to 4.3
Once again strong normative guidance will need to be provided. Failures in this respect by plantation companies have been one of the main focusses for attacks on the integrity of the FSC programme. Lack of guidance has resulted in a very wide range of performance by FSC certified companies.
4.4 assume that additional activities over what forest management provides are required. I disagree as there many cases where forest management provides suitable employment, uses the community services and provides the community services. In cases more than other land uses - so why require more?
I remain concerned about the effect and ability to actually meet 1.8, 4.4, 4.6 and 5.4. Whils tthe eplanatory notes assist the actual intent of these Criterion remain unclear or have the potential to be interpreted in a way that could make them impossible to meet.
Interpretamos que excede la naturaleza y responsabilidades del trabajo de la Organización y la deja en una situación de vulnerabilidad a potenciales extorsiones de sectores de la comunidad. La inexistencia de este cirteiro no quita que la organización pueda contribuir.
Agree that organization has to contribute to local communities but can not agree on "additional activities". Additional - to be deleted. It is not key objective for company to focus on community development projects.
problem with "additional activities" additional to what - forestry activities, activities already being carried out?
Criterio 4.4: Esta obligación puede generar demandas insaciabiles de parte de algunas comunidades, haciendo inviable el manejo forestal. El manejo forestal de las Organizaciones no debe reemplazar las obligaciones ni el rol del Estado. La contribución de



la Organización en el desarrollo social de las comunidades debería ser en el ámbito forestal, tales como el empleo, uso de los servicios de la comunidad, capacitación, transferencia de tecnología forestal, etc.

In the south, there is a strong relationship between forests and/or plantations with poverty (very low index of human development). Local populations live in a very economically rich environment (forests and plantations) but all this richness is taken away even at present in big FSC Certified areas. FSC Certification can not live together with poverty (Please revise again Plantation Working Group Report). The proposal of 4.4 is only a timid confirmation of the present paternalistic approach that FSC companies are already doing. But there are examples that FSC certified operations are being engaged in local development activities not only with communities, but with municipality, local NGOs and Government. It is not a new issue. I have mentioned a case recently in FSC plantation seminar in Brasil. This kind of actions (and obligation for FSC certified operations IF WE SPEAK ABOUT RESPONSIBLE FOREST MANAGEMENT) must be explicit in the P&C. This was the spirit of the South-South process, motions approved in GA Manaus 2005 and the conclusions and propositions of the Plantation WG 2005-2008.

So it is necessary to have a new Criterion to reflect the obligation of a FSC certified operations to contribute to local development (not only giving scholarships or computers to local schools or other paternalistic actions) together with local actors communities, municipality, local government, NGOs, ETC). Of course according the scale and intensity of the operations.

Se propuso antes no hacer referencia a “desarrollo económico”, ya que sus indicadores de medición están siendo cuestionados; sería mejor decir “calidad de vida”; Se propone: ...que contribuyan a mejorar su calidad de vida.

4.4-Additional activity has value. Providing a Foot Ball kit could constitute additional activities for few..Word should be local community development. In addition, there should be some minimum limit laid down for obligation of organisation.

4.5- Mere engagement shall not suffice. There should be a legally binding SIA on the part of organisation

Both the C should be complied with before undertaking any site disturbing activities as provided in 6.2..



Comments on Criterion 5.1

It can not be the main focus for a forest company to "strengthen and diversify the local economy", only to support it.
The list of 'ecosystem services' is extensive, as could all of the products arising from them be. Given the scale of forest tenures in BC, this could be significant additional responsibility/workload on the tenure holder.
It can not be the main focus for a forest owner, especially SLIMF, to "strengthen and diversify the local economy", only to contribute to it.
"To strengthen and diversify" local economy is a very strong wording. Proposal: use "encourage" or "strive" instead.
Take back the word "strive" from the revised 5.4. (strive to strengthen...)
It is very difficult to prove that the forest management will strengthen the economy of local communities. First of all, "local communities" varies between countries. In many countries urbanisation leads to that local communities have large problems with infrastructure, jobs etc. In the same regions forestry can be one of the few viable enterprises. It is more realistic to use words as "encourage" "maintain" rather than "strengthen".
It can not be the main focus for a forest company to "strengthen and diversify the local economy", only to support it.
5.1 Very challenging: Shall strengthen and diversify the local economy (5.1). This is a stronger wording as it used to say "encourage" and "strive". Comment: The text includes now "... or enable the production". This is too far reaching. The decision which products to sell must remain in the hands of the owner. The text in version D3-0 was acceptable.
Principle 5 The requirement to manage for multiple products and services for the purpose maintaining or enhancing long term economic viability may be beyond the scope/capability of a manager and will prove extremely difficult to assess during certification.
Criterion 5.1 Same as for the Principle itself
Add words: ... shall "identify, document and" demonstrate ...
The text includes now "... or enable the production". This is too far reaching. The decision which products to sell must remain in the hands of the owner. The text in version D3-0 was acceptable
Using strengthen and diversify the local economy, this are stronger wording as it used to say "encourage" and "strive".
To me this criteria is almost perfect at the same time that is one of the most relevant. To be aligned with the Principle description I suggest to replace the term 'local economy' for 'benefits from the forest'. I think that the goal of this criteria is proportionate the maximum benefits from the forest well-managed and this extrapolates de local economy.
Need to imply it is optional - if it is demonstrated that multiple products are unviable or risky then it must not be implied that this criterion is compulsory.
Suggestion to include reference to efficiency and reduction of merchantable waste from 10.11.
add qualifying language at beginning, " In management units that are commercially managed for resource extraction..."
I'm not disagreeing to 5.1 but question what happens if The Organization only has control over the timber and not the non timber forests products. The manager's ability to diversify



<p>and strengthen the local economy is very limited with only controlling the timber products. Perhaps this criterion can be reworded "If the Organization has control over non-timber forest products"</p>
<p>"IN MANAGEMENT UNITS THAT ARE COMMERCIALY MANAGED FOR RESOURCE EXTRACTION, the Organization shall identify, produce, or enable the production of, diversified benefits and products, based on the range of resources and ecosystem services* existing in the Management Unit in order to strengthen and diversify the local economy proportionate to the scale and intensity of management activities." An edit such as proposed here is necessary to avoid the mis-interpretation that resource extraction is and/or should be occurring on any and all certified management units. With the certification of public lands in the US, the certification of HCVF in various regions, etc., there are and will be certified management units on which conservation is or should be the primary objective, and resource extraction is not appropriate.</p> <p>Exp Note from prior draft: "This requirement does not expect that all products and services are always harvested, developed or marketed by The Organization itself. However, it is expected that The Organization, as long as this does not prevent achieving its own management objectives or compliance with the Principles and Criteria, provides opportunities to local entrepreneurs and individuals willing to do so, to develop, process and market products and services derived from the Management Unit, to retrieve products and services from the Management Unit or to allow them to enjoy the benefits and products from the Management Unit." This inappropriately assumes that resource extraction is and/or should be occurring on any and all management units. With the certification of public lands in the US, the certification of HCVF in various locations, etc., there are and will be certified management units on which conservation is or should be the primary objective, and resource extraction is not appropriate.</p>
<p>Suggestion to include reference to efficiency and reduction of merchantable waste from 10.11.</p>
<p>5.1 should recognize that this should apply only to management units that are commercially managed for resource extraction to avoid the mis-interpretation that resource extraction is and/or should be occurring on any and all certified management units. With the certification of public lands in the US, the certification of HCVF in various regions, etc., there are and will be certified management units on which conservation is or should be the primary objective, and resource extraction is not appropriate.</p>
<p>5.1 -Sentence structure could be read so that "identifying" is the minimal that could be done. Also "enable production of" is not clear. There are too many concepts in this Criterion to be placed clearly in one sentence. Recommended change"</p>
<p>"The Organization shall identify products and ecosystem services available from the MU and shall maintain the forest in a condition capable of producing those products and services. If the Organization produces products and/or enables the production of products it shall do so in a way to strengthen and diversify the local economy proportionate to the scale and intensity of management activities.</p>
<p>The wording of the Criterion is very general shadowing the sense of Principle 5 as a whole. We recommend to clarify the implementation of this criterion.</p>
<p>Criterion 5.1: I think this is poorly written and it is not clear what is required here. By saying Identify, produce or enable, does that mean - identify or produce or enable? ,or is it required,</p>



once benefits and products have been identified to exploit them? I think this needs to be rewritten. The link between this the economic viability of the potential benefits and products needs to be firmly established.



Comments on Criterion 5.2

<p>When a logging is conducted there are changes in the environment for a number of years. It is not reasonable to demand all ecosystem services should be provided exactly as they were before logging at a specific site. The aim shall instead be to maintain the service on a broader scale, on the landscape level or so. You have to modify the text to clarify that.</p>
<p>Ecosystem functions and services are included where it used to say only “rate of harvest”. Proposal: Include [Management Unit] “secure economic viability without” [impairing...]</p>
<p>Section 5.2 should include a statement that promotes proper utilization of the resource on site. As written, it is correct but needs additional support for efficient utilization of harvested material.</p>
<p>There must be a balance demands and costs with between sustainable production of traditional forest products and “ecosystem services”. The former is highly relevant for the individual forest owner, whereas ecosystem services is a much broader output, and usually more valuable to society rather than the individual forest owner.</p>
<p>When a logging is conducted there are changes in the environment for a number of years. It is not reasonable to demand all ecosystem services should be provided exactly as they were before logging at a specific site. The aim shall instead be to maintain the service on a broader scale, on the landscape level or so. You have to modify the text to clarify that.</p>
<p>Unacceptable: Ecosystem functions and services are included where it used to say only “rate of harvest” (5.2). Proposal: Include [Management Unit] “secure economic viability without” [impairing...]</p>
<p>Note 5 probably needs substantial revision. Most tropical forest mangement systems based on minimum felling diameters can be easily demonstrated to cause forest degradation. The prohibition on re-entry enshrined in much national forest legislation is actually a prohibiiton of the silviculture necessary ot ensure successful regeneration of the forest stand. We must be very careful not to prohibit sustainable forest management in our quest to avoid forest damage.</p>
<p>The text should stop after “... providing those products and services”. The reference to the provision of ecosystem functions and ecosystem services should be deleted here as they are anyhow addressed specifically in Principle 6</p>
<p>failure to reinsert (and enforce) the language of current criteria 5.6 will go down in history as one of the greatest mistakes in this whole P&C revision process. See for example this recent blog from CIFOR, http://blog.cifor.org/2011/05/10/the-timber-may-be-certified-but-is-it-sustainable/. The only acceptable fix is to reinsert the original language of 5.6.</p>
<p>5.2 - Lacks clear language to maintain yield</p>
<p>5.2 lacks clear language to maintain yield</p>
<p>Existing C5.6 addresses one of the most fundamental tenets of sustainable resource management, i.e., the prevention of resource depletion. However, this proposed revision is fundamentally flawed and unacceptable as written, for at least three reasons. First, it replaces an “on the ground” performance measure with a process based standard. Under the revised language, harvest rates no longer need to actually be sustainable “on the ground,” but instead organizations can simply submit plans that appear to be effective. Second, it replaces a clear prohibition on cumulative and gradual resource depletion (“the rate of harvest... shall not exceed levels which can be permanently sustained”) with language that allows substantial and dramatic resource depletion as long as any residual amount of resource remains to be harvested (“long term ability...to continued providing those products and services”). Third, the new language does not require that any particular</p>



amounts of the resource actually be retained or restored, but merely requires the possibility that some amount of the resource potentially exist again.

Exp Note from prior draft: "FSC acknowledges that Management Units offer a mixture of tangible products and environmental services which vary over time. FSC also acknowledges that human harvests change over time in response to changing local and domestic needs and markets. While outputs may vary in species composition, dimensions and qualities, this criterion requires that the capacity of the Management Unit to regenerate its full potential range of products and services is maintained and/or enhanced." This statement is disingenuous. The proposed language at C5.2 does not actually require that the "full potential range... be maintained or enhanced."

Exp Note from prior draft: "This Criterion requires that harvest cycles for specific products (for timber these may be legally required to be shorter than biological or maximum-volume-increment rotations) are in accordance with

- size or volume limitations (e.g. felling diameter limits in the case of timber) which sustain the flows specified in the forest management plan," This appears to be a deeply flawed and unacceptable reversal of the proper relationship between the management plan and sustainable harvest calculations. Management plans should be written to comply with the (existing 5.6) requirement to not harvest at rates greater than those which can be permanently sustained, i.e., to not engage in cumulative resource depletion.

Exp Note from prior draft: "This criterion does not require Sustained Yields in the sense of fixed annual or periodic yields of the same quantities, qualities, sizes or species. It does require that the production systems and harvesting practices are compatible with the stated long-term objectives of management, and do not prejudice the productive capacity of the site or impair species survival. Management and silvicultural practices should not prejudice the ability of the Management Unit to maintain a continuity of production of the same forest products in quantities that match the management objectives, and that allow for changes in objectives over time." Again, this paragraph is deeply flawed in that it makes the definition and calculation of sustainable harvest rates under 5.6 secondary to management objectives which may have nothing to do with sustaining existing natural tree species mixes, timber volumes, habitats, etc. Absent demonstrated compliance with the P&C, it must not be assumed that Organizations' management plans are "sustainable." In fact, many timber companies operating in North America and elsewhere are anything but sustainable in absence of outside mechanisms like the FSC.

rewrite to add implementation and long term viability per the following:

"The Organization shall demonstrate that effective measures are in place and

implemented so that harvesting rates and yields of products and other services derived from the MU do not impair the long-term ability of the MU to continue providing those products and services, the long-term viability of ecosystem functions and ecosystem services of the MU."

needs more specifics around what constitutes sustained resource use

lacks clear language to maintain yield

lacks clear language to maintain yield



lacks clear language to maintain yield
lacks clear language to maintain yield
Lack of clear requirement that there should be a maintenance of the yield of forest products and services (weaker than existing)
2 the proposed revision is fundamentally flawed. First, it replaces an “on the ground” performance measure with a process based standard. Under the revised language, harvest rates no longer need to actually be sustainable “on the ground,” but instead organizations can simply submit plans that appear to be effective. Second, it replaces a clear prohibition on cumulative and gradual resource depletion (“the rate of harvest... shall not exceed levels which can be permanently sustained”) with language that allows substantial and dramatic resource depletion as long as any residual amount of resource remains to be harvested (“long term ability...to continued providing those products and services”). Third, the new language does not require that any particular amounts of the resource actually be retained or restored, but merely requires the possibility that some amount of the resource potentially exist again.]
Top level issues that currently prevent us from supporting this standard include:
* C 5.2: current 5.6 language, "the rate of harvest of forest products shall not exceed levels which can be permanently sustained" must be retained in new standard. This is the most fundamental, basic and understandable criteria of responsible forestry.
Ironically given my other comments, this Criterion is one where the qualifier "long-term" is better omitted. In ecosystems where stand-replacing natural disturbance is rare, the fact that it might be able to provide the same products or services 500 or 1000 years from now provides little comfort about sustainable rates of harvest today!! Ecosystem function etc. must be maintained at all spatial and temporal scales.
5.2, a) La formulación debe ser mejorada; está confusa, y por tanto la traducción al español no esta correcta. Además, se debe precautelar no solo las funciones y servicios del ecosistema de la Unidad de Manejo, pues primero la Unidad de Manejo no necesariamente va abarcar todo el ecosistema, y segundo, puede afectar ecosistemas adyacentes o a nivel de paisaje. b) en las notas explicativas se deberá hacer referencia a que el operador debe demostrar el “derecho” o el respectivo permiso legal para hacer uso de los servicios ambientales.
5.2- Forests are biological complex eco-system & creation of millions of years. They can not be treated as production factories to be managed for local/domestic/market needs. Needs can not be bases of sustainability. It is very narrow interpretation to presume that sustained yield is only for timber. 5.2 puts emphasis on Responsible Forest Stewardship, which is not only undefined but makes sustainability subordinate to needs of organisations.



Comments on Criterion 5.4

To demand to use local processing if available, proportionate to scale, intensity and risk is OK. But is not OK to demand the Organization shall make attempts to establish these services. Change the criterion according to this.
This is very problematic and could make FSC certification impossible in BC. With the changes in appurtancy, companies have more flexibility on where to process timber. Also, 'local value adding' would be a problem for many tenure holders, as would the requirement to help establish services.
The Organization "shall use" local processing etc. Depends on the definition of "local" ("in, adjacent or close enough"). The relevance of this should be left to national initiatives and the wording should allow for adjustment to local/national conditions.
"Shall use" local processing etc. (and establish) is an unacceptable writing. "Local" must be defined and there must be space for the national initiatives to negotiate national indicators in this matter!
Financial or business realism must be considered in this.
Leave this level of detail to National initiatives to sort out
To strict. Adaptations to national conditions must be tolerable by the national initiatives.
Unacceptable. This criteria is against the regulations of the EU, Free Trade and Free Movement of People.
To demand to use local processing if available, proportionate to scale, intensity and risk is OK. But is not OK to demand the Organisation shall make attempts to establish these services. Change the criterion according to this.
5.4) the demand to "shall use locally" is in conflict with current market terms and procurements.
Unacceptable: The Organization "shall use" local processing etc (5.4). Depends on the definition of "local" ("in, adjacent or close enough"). The relevance of this should be left to national initiatives and the wording should allow for adjustment to local/national conditions.
Comment: The text should stop after "... where these are available proportionate to scale, intensity and risk." The last sentence should be deleted as they are addressed in criterion 4.3; 4.4, 4.5 and 4.6.
Depending on product mix and available infrastructure it may be impossible and not at all desirable to undertake or invest in local manufacturing including value added. Local services should be used if they are available at a competitive price.
the word reasonable needs guidance over and above the glossary definition. In particular the organisation may be required to carry out local 'processing' which is not financially optimal in the short term in order ot establish local capacity.
5.4 I find this counterproductive to a free economy (on which the other foret benefits are based), where price and value of service should also be key - hiring local servcies or processing must be price and value competitive. Niether should a forest manager be compelled to establis these if they do not exist, as there are many other factors that should be considered than purely local benefit - some which may actualy be detrimenta to local communities.
I remain concerned about the effect and ability to actually meet 1.8, 4.4, 4.6 and 5.4. Whils tthe eplanatory notes assist the actual intent of these Criterion remain unclear or have the potential to be interpreted in a way that could make them impossible to meet.
To demand to use local processing if available, proportionate to scale, intensity and risk -



acceptable. Demand "the organization shall make attempts to establish these services" - not acceptable.
I suggest to insert the term "reasonable" before the condition of use 'local processing, local services, and local value'. I know that is the better option but sometimes this is impracticable. This criteria can not be so hard as the writing suggest. The fact of being available does not mean that it is feasible (for the various reasons i.e questionable behavior of some local parties; quality of some local services; etc).
In principle we agree that local services should be used. But companies cannot be forced to use such if these do not fulfil commercial requirements (e.g. quality, competitive prices). A better formulation might be: "The Organisation shall give preference to.... "
In principle we agree that local services should be used. But companies cannot be forced to use such if these do not fulfil commercial requirements (e.g. quality, competitive prices). A better formulation might be: "The Organisation shall give preference to.... "
The implications of this phrase in 5.4 needs to be clarified: "If these are not locally available, The Organization shall make reasonable attempts to help establish these services."
Criterio 5.4: El párrafo "Si no están disponibles localmente, la Organización deberá realizar esfuerzos razonables para apoyar el establecimiento de dichos servicios" puede implicar el riesgo de crear responsabilidades adicionales que inviabilicen el manejo.
5.4 Again I propose to eliminate word "reasonable".If we use "proportionate to scale, intensity and risk", the word reasonable is not necessary.
Se insiste en que una nota explicativa debe referirse a la necesidad de que La Organización debe promover el fortalecimiento y la viabilidad económica del procesamiento local, el agregado de valor local, y la provisión de los servicios locales, que va más allá de "training"; de esa manera La Organización podrá usar tales servicios, y por tanto el apoyo a la economía local que rezan los criterios 4.3 y 4.5 se podrá en práctica, y tendrán concordancia con este Criterio.

Comments on glossary definitions related to Criterion 5.4

Definition Reasonable

I think the definition of reasonable is culturally defined and should be changed. For example in some religiously based societies it is considered reasonable to execute a person who renounces their religious beliefs in favour of another religion. I do not find this reasonable.



Comments on Criterion 5.5

<p>Has the list of recognized standard been published? I imagine that will be essential to waying member's opinion of criterion 5.5.</p>
<p>It is totally unacceptable to introduce such a criterion before there are any decisions concerning the role of FSC in the global climate change mitigation work. I also object to the idea saying FSC shall have the mandate to say which standards are credible or not.</p>
<p>This may limit the opportunity regarding carbon sequestration compensation if the FSC recognized standard does not apply in BC. Little information is available on what this standard could look like.</p>
<p>The inclusion of carbon dioxide sequestration under ecosystem services is premature given the ongoing discussions in FSC and should be amended at a later stage.</p>
<p>It's unacceptable for FSC to set a criterion this nebulous in a question that is of such importance. FSC needs to create a statement in the climate/carbon question and until that is done there should not be writings like this. Proposal: Delete the criterion.</p>
<p>Not prepared to require this as part of the FSC system at this time.</p>
<p>Because compliance with a carbon standard is checked by other CBs of carbon standard, it is not needed to mention about it in the FSC P&C. Also, other standards for ecosystem services for financial reward may arise in the future. Therefore, 5.5 should be that the organization shall seek financial reward from other than forest products such as the provision of ecosystem services.</p>
<p>It is not appropriate to forces FSC-certified forests into a specific FSC-approved carbon protocol. This is absolutely outrageous. I understand the movement on the carbon front/ecosystem services front. The concern I have is that FSC moves too slowly to address this - landowners could really be stuck in a lull waiting for FSC-IC to make a final move on which carbon protocols are ok. Does not seem fair or appropriate.</p>
<p>Is there "an FSC recognized defensible and credible carbon standard?" It seems premature to include this issue at this time.</p>
<p>The matter of If/how CO2 sequestration should be included is an ongoing discussion in FSC and should not be preceded by this criterion.</p>
<p>FSC should not regulate which carbon standard is used. Carbon agreements are long lived and if FSC changes the criterien and disallows a certain standard, there is no remedy for the landowner.</p>
<p>This suggestion is premature, and should be investigated further by FSC. Then, the whole life-cycle of forest products should be regarded, not only C-sequestration by growth.</p>
<p>It is totally unacceptable to introduce such a criterion before there are no decisions concerning the role of FSC in the global climate change mitigation work. I also object to the idea saying FSC shall have the mandate to say which standards are credible or not.</p>
<p>The carbon standard is still under development, thus a decision of compliance can not yet be taken.</p>
<p>Unacceptable: The inclusion of carbon dioxide sequestration under ecosystem services (5.5). This is premature given the ongoing discussions in FSC and should be amended at a later stage.</p>
<p>Not necessary and to be deleted. Comment: This is one of the most controversial criterion. FSC has hardly started working with the carbon theme and not even defined "defensible and credible carbon standard". The criterion includes unacceptable degree of uncertainty and gives FSC the white card.</p>



Am not aware that an FSC recognized carbon standard is available or on what basis FSC can make the determination.
5.5 I do not believe that this belongs in the principle at all. It is an organisationsl issue and not a standard issue. There are already other regulations in FSC for preventing labelling of goods with other conformity schemes labels and this issue should be dealt with elsewhere. Why are we singling out Carbon payments here and not including systems for other ecosystem payments such as water supply services or biodiversity conservation schemes used in conservation banking systems etc.
Forests are a principle source of stored carbon. Sustainability based on management planning and activities should show maintenance and or enhancement of those stocks over harvesting cycles.
This criterion will put a lot of responsibility on FSC AND it might be that FSC is not able to evaluate in time the different Carbon standards that are available or will emerge. The risk is that an Organisation, compliant with FSC FM, could not benefit from Env. services only because this evaluation has not been done.
The criterion could be reformulated.
Whenever there is available FSC Carbon Standard, this criterion is introduced
FSC can not limit or set carbon standards company has to use. It is up to companies decision as it does not affect sustainable forest management as well as such requirement could be against free market rules - to be deleted.
Remission to external document and workgroup.
The analysis of this criterion is prejudiced by the lack of protocols for recognizing defensible and credible carbon standards and other results of the FSC Workgroup so far.
We strongly disagree with the indication or induction for certification of specific carbon standards, not considering the existing initiatives of FMEs, when not recognized by FSC. Would the FME then be demanded to look for compliance with an additional carbon standard? This would mean forcing new certification aside FSC standards, which is unacceptable.
Suggestions: <ul style="list-style-type: none"> - Introduction of specific public consultation after final version of protocols for recognizing defensible and credible carbon standards and other outcomes of the FSC Workgroup on the theme. - Definition of a better approach to the theme or its exclusion.
The indication of a specific carbon standards, not considering the existing initiatives of FMU, when not recognized by FSC would mean forcing a new certification aside FSC standards. Definition of a better approach to the theme or its exclusion.
Why the FSC trying to give this huge value to a particularly ecosystem service (carbon)?? I think FSC shall keep to its main purpose, to strive for a responsible forestry. To me this criteria is totally unacceptable!
The carbon (as storage on plantations or REDD+) is one of a large number of ecosystem services and do not need to be treated differently - even worse if this is done in the form of criterion.



Put the carbon at this way in the standard can be very premature.
Já existem outros sistemas de certificação que avaliam se uma determinada floresta é capaz de fornecer serviços de armazenamento de carbono. Não é papel do FSC. Torna mais difícil a auditoria por parte de auditores não treinados para esta finalidade.
All depends on what carbon standards FSC will recognise - could lead to unfair business practise
C5.5: (...) strongly opposes this articulation. The intent of the criteria must limit itself to expectations that forest management will maintain or enhance carbon stocks. Secondly, the term "an FSC recognized defensible and credible carbon standard" is in reference to a standard that does not yet exist, much less one that FSC could recognize. We oppose linking FSC to endorsement of carbon offsets.
generally support concept but are concerned it goes to far in regard to offsets
while we generally support a credible carbon standard we are concern that this goes too far in the direction of forest carbon offset credits
Good direction for 5.5, but without the criteria and list of credible carbon accounting standards, difficult to know whether to support or object
5.5 while we generally support a credible carbon standard we are concern that this goes too far in the direction of forest carbon offset credits
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Linking this criterion to financial payments is unnecessary and creates a direct controversial link to carbon markets. It would be better framed as 'recognition'
This implies that FSC supports carbon trading as a legitimate forest activity but I don't think there is agreement in the membership over this . If there isn't agreement over this then I don't think the P&C should refer to it in a way that implies there is
There is no FSC standard for carbon so practically it is impossible to achieve compliance. Some current FSC certificate holders may already be receiving financial rewards from carbon credits in which case they would have a short time to comply with any new standard. FSC could realistically take many years to develop a standard on such a contentious issue even if they do get the go ahead from members. Many FSC membership/stakeholders particularly in env and social chambers would disagree on principle with FSC certifying carbon and this could jeopardise the whole P&C, and the long term multi-chamber support for FSC.
The impacts of this phrase in 5.5 needs to be clarified "an FSC recognized defensible and credible carbon standard." It may not be appropriate for FSC to be limiting the economic diversification opportunities available to certificate holders in this way. It is not clear what FSC's capacity and approach to recognizing carbon standards will be, and if the process is delayed or inconsistent it could create significant barriers to FSC certificate holder participation in ecosystem market opportunities.
Top level issues that currently prevent us from supporting this standard include: * C 5.5: This is deeply problematic approach for addressing forest and climate issues in the standard, and combined with deletion of high carbon forest landscapes from HCVF definition is setting FSC down the wrong path.
It is not clear from the wording how this Criterion will be assessed for the enterprise not



wishing to participate in getting quotas for carbon sequestration. When assessing the enterprise, one should write: organization does not look forward to get a reward, and therefore, does not take measures to prevent deforestation or degradation, or one should conclude that the criterion is inapplicable.

This criterion is new but it is needed to have carbon standard recognized by FSC and disseminated widely

Es muy positivo haber incluido este Criterio. Incluir en la formulación no monetaria; es decir: "...retribución monetaria y no monetaria..."



Comments on Principle 6

<p>We cannot introduce the demand to restore ecosystem functions, biological diversity, water and biomass resources, soils, landscape values and ecosystem services. I wrote all parameters down here to show and underline how impossible it is to demand all that from an Organization. Upon that the following question is: restore to what?</p>
<p>6.0 Reference to 'Ecosystem Services' which could be very extensive. Uses the term 'restore' which could be costly. Also need clarification on the time frame (regarding biological diversity).</p>
<p>6, 6.5, 6.7, 6.8 Several criteria state that the Organization shall restore functions (6), areas (6.5), water (6.7) etc. Restore to what? 100 years ago, 1000 years ago? Proposal: Use the words like "maintain" or "develop" or, alternatively, provide a clear definition of the word restore in the context.</p>
<p>To use the term "restore" throughout the principle (fore example in 6.6 and 6.7 etc.) is from an ecological perspective very strange. It indicates that ecosystems are static and do have a steady state. This is not the case as anyone with ecological competence is well aware of. This raises the question: restore to what? As was before mankind arrived, as was before certification or as it is today?</p>
<p>Proposal: use the phrase "maintain or develop"</p>
<p>6, 6.5, 6.7, 6.8 - The word "restore" can lead to interpretation conflicts. Restore to what? It might lead to demands which are impossible to handle.</p>
<p>6, 6.5, 6.7. This text will put an unrealistic demand on the forest owner. Restore from what condition, to what? The present condition is the product from not only current management but also former land use. Restoration is not feasible with the cooperation with society and non-certified forest owners.</p>
<p>We can not introduce the demand to restore ecosystem functions, biological diversity, water and biomass resources, soils, landscape values and ecosystem services. I wrote all parameters down here to show and underline how impossible it is to demand all that from an Organisation. Upon that the following question is: restore to what?</p>
<p>Text: Comment: The Principle reads very technical and mentioning all the different environmental values creates a significant amount of monitoring requests.</p>
<p>Principle 6: It needs to be acknowledged in the explanatory notes that some environmental values will fluctuate throughout the forest cycle, and that what is important is maintaining the long-term environmental values of the Management Unit.</p>
<p>Reference several sections re definitions. The definition of Biological Diversity is weak (see my notes at the beginning of this review). Environmental Functions and Environmental Services definitions need enhancement. What is missing is reference to the "attributes" of forest types. These attributes exist within the present day (not historical). These attributes may have been abused by recent practices however can be restored. Forest community attributes significantly contribute to health, vigour, resilience, carbon sequestration and storage. [very important]</p>
<p>Principle 6 as written doesn't provide a context or baseline for determining what should be maintained or enhanced. For instance is the requirement to maintain or enhance "natural" biological diversity or does it accept that the management unit exists in a modified rather than natural condition?</p>
<p>6. I disagree with the inclusion of the term biomass resources. It is very likely that in order to provide for sustainable management and production that total above ground biomass in</p>



<p>many forest systems will need to change. In many fire dependent forest systems there is a need for episodic massive changes in Biomass in order to ensure regeneration. We need to make certain that the FSC standard for forest management does not become subservient to a carbon sequestration demand (which the forests of the world can never meet).</p>
<p>In relation to P6 and C6.5, there needs to be greater clarity about what constitutes maintenance and restoration of "ecosystem services, biological diversity". How is a forest manager (or a CAB or CAB assessor) going to determine whether restoration is required rather than maintenance, or the extent to which restoration or maintenance has been achieved? What is the baseline that is to be used if, for instance, natural ecosystem services have been impacted (a long time) prior to certification? Does "biological diversity" imply "indigenous biodiversity" given the constraints on the use of "alien species" in the Standard and if so, what implications does Principle 6 have for plantation managers growing exotic (alien) tree species?</p>
<p>Ecological merit is at risk. The wording should be stronger and more clear to protect and enhance the attributes of natural systems. Principal 6 is huge in implication and yet is thin on bringing home long term attributes of resilient and healthy forests and societies.</p>
<p>The Principle reads very technical and mentioning all the different environmental values creates a significant amount of monitoring requests.</p>
<p>The principle as a whole is unacceptable.</p>
<p>Inclusion of different technical themes/concepts, under current scientific development and/or without a due definition.</p>
<p>The use of concepts like "environmental values" "ecosystem functions", "landscape values", "natural cycles and flows", "aquatic connectivity" etc. add a lot of complexity in the field level. The conception of a standard is to be accessible to users and ultimately to all FSC community.</p>
<p>Suggestion: Simplification. Inclusion of specific demands/concepts on the standard using the text of the criteria, instead of remitting to broad, unspecific concepts.</p>
<p>The use of expressions like "environmental values" (6; 6.1), "ecosystem services", "landscape values" add a lot of complexity in the field level. The conception of a standard is to be accessible to users and ultimately to all FSC community.</p>
<p>Principle 6 - It is difficult to provide references to 'restore' the biological diversity, water, soils, landscape values and ecosystem services. To me the better term is just 'maintain' (a specific criterion - see 6.3 - can require to the Organization restore some attribute if it was negative impacted, and give to the CB the power of audit the Organization's strategies to fill this requirement).</p>
<p>What about other ecosystems or vegetation type does it only apply to natural forest - clearly a woodland is not defined as natural forest</p>
<p>General comments for 6.3, 6.5, 6.6, 6.8. While it is important to maintain the integrity of the forest within the management unit, it is inevitable that there will be biodiversity loss. Restoration may not necessarily provide the best environmental outcome (as specified in 6.3, 6.5, 6.8) as it can be difficult to achieve and can be very costly. A third option of The Company providing compensatory biodiversity offsets should be considered. Far greater conservation outcomes could be achieved by funding already established but degraded conservation areas (Biobanks) within the landscape that The Organisation operates.</p>



It is important of course that this is a final step in a process that The Organisation goes through. They need to have demonstrated how they have attempted to protect significant environmental values within the management unit in the first instance, but where this does not happen, compensatory biodiversity offsets could be considered as an option instead of restoration.

There are a growing number of countries and organisations that recognise that there are times where the overall gains from natural resource use outweigh the biodiversity losses but they require that any biodiversity losses must be offset to achieve an overall 'no net loss' or even a "net gain" for biodiversity.

Landscape values are highly subjective and there are often conflicting landscape values from different groups of stakeholders.

need addition of the word "all" before ecosystems functions. The language on unique and fragile ecosystems and landscape conservation as well as the goal of maintaining natural forest integrity found in the original P¹ has been lost. Maintenance and/or restoration needs to be done by comparison to a reference, which needs to be the natural native ecosystem for the site.

General comment: The Plantation Working Group agreed to merging the plantation and natural forest together on the condition that there be two sets of criteria articulated for P¹; one for natural forests and one for plantations. This key agreement has been lost.

"The Organization shall maintain and/or restore ALL ecosystem functions*, biological diversity*, water and biomass resources, soils, landscape values* and ecosystem services* of the Management Unit."

It is absolutely crucial that the word "all" be inserted as suggested above. Otherwise, the principle could be misinterpreted as only requiring protection of "some" ecosystem functions, biodiversity, etc.

As further explained in my comments on P1 and below, the new exclusive focus on "organizations" rather than "forest management" does not maintain sufficient requirements for all forest management in the unit to comply with principle 6 and others. The creation of such loopholes would be completely unacceptable. While important in its own right, the edit proposed above is not sufficient to address these concerns.

The proposed revised language has also deleted protections for "unique and fragile ecosystems and landscapes, which is unacceptable." This would only be acceptable if the corresponding new language is ultimately adopted under P9 – and if organizations and CB's begin to view HCV assessments as something that must address potentially small element occurrences across forest management units, rather than something that just focuses on very large landscape level occurrences.

Exp Note from prior draft: "Where applicable, the results of the assessment and identification of environmental values and potential negative impacts (including potential impacts of external events such as storms, fires and pests, and changes to habitats/environments outside the MU boundary) and prevention, remediation and mitigation measures are to be incorporated in the Management Plan according to Criterion 7.2. However, in management units where no man-made site-disturbing activities are taking



place or planned, such elements do not need to be included in the Management Plan." While exempting such elements from planning may be OK in cases where human disturbance has never occurred, either directly or indirectly, such an exemption would not be acceptable in other cases, since even if further site-disturbing activities are not planned, restoration and other remediation may still be needed to correct the impacts of past site disturbing activities, which may have been quite severe. It is for these and other cases that Criterion 7.2 does not prescribe a list of elements that must always be included in the management plan.

Exp Note from prior draft: "The words "maintain and/or restore" are used here to make it clear that The Organization is obliged to maintain environmental values that exist at the time of certification. It is also obliged to restore those that have been negatively affected by the activities of The Organization, as far as is reasonably possible, to the status that existed before they were negatively affected." Restoration should not be limited to dealing with impacts of the organization being certified per se. Forestland changes ownership quite frequently in some parts of the world, including the US, and failure to require restoration of the impacts of previous owners means that some of the worst forms and cases of ecological degradation will not be remediated, which would seriously compromise the FSC's credibility and effectiveness.

Exp Note from prior draft: "The Organization is not necessarily obliged to restore those environmental values that have been affected by factors beyond the control of The Organization, e.g. by natural disasters, by climate change, or by the legally authorized activities of third parties, such as public infrastructure, mining, hunting or settlement. FSC-POL-20-003 "Excision of areas from scope of certification" describes the process by which such areas may be excised from the area certified, when appropriate." Strongly disagree with regard to impacts created by prior landowners, impact of third parties and public infrastructures that were authorized or enabled by the organization being certified, etc. Indeed, some forest owners in the US and elsewhere are actively selling off land parcels or certain land use rights to other entities, including mining and infrastructure development rights, and they should not be absolved from accountability for the resulting impacts. This proposed exemption is completely unacceptable. In addition (perhaps more relevant under P9) Companies should have an obligation to manage forests to mitigate climate change if identified as an HCV.

Exp Note from prior draft: "The Organization is also not obliged to restore environmental values that may have existed at some time in the historic or pre-historic past, or that have been negatively affected by previous owners or Organizations." Strongly disagree. As explained above, this note is fundamentally unacceptable, given how frequently forest properties change hands in some regions, and would seriously undermine the FSC's credibility and effectiveness.

It is necessary to ensure the area certified is not being negatively impacted by other industry—it is the forest that is being certified as well managed, not the organization that is being certified.

Language on protecting endangered species needs more clarity, especially regarding taking into account the region beyond the Management Unit.

The proposed language is too much of a laundry list of unparallel elements. Would go back to current language and add a restoration component: "The Organization shall conserve



and/or restore native biodiversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and by so doing, maintain the ecological functions and integrity of the forest.”
Note re P6 - Landscape values are highly subjective and there are often conflicting landscape values from different groups of stakeholders.
the principle needs to apply to all ecosystem functions and not be left unclear as to whether only some must be address.
Principle 6 – Needs inclusion of “all” per:
“The Organization shall maintain and/or restore all ecosystems functions,
The phrase "biomass resources" is redundant with ecosystem functions and should be removed from the Principle language.
Adaptation shall specifically refers to the need of adapting to climate change
Top level issues that currently prevent us from supporting this standard include: * Failure to reflect primacy of natural forests and natural forest conservation as primary benchmark and goal in the standard. * treatment of plantations including failure to meet plantation WG key recomendation that would have established two sets of criteria under P6 based on whether management unit classified as plantation or natural or semi-natural forest
Principle 6: FSC encourages "best practices" in forest managemente, for that reason I suggest the following wording: The Organization shall maintain, IMPROVE and/or restore ecosystem functions, biodiversity . . .
Perhaps there will be need for independent assessments rather than the organisation carrying out its own.
I strongly support the emphasis on both maintainance and restoration throughout (ie much preferable to old enhance`)
6.a) Al parecer hay una confusión en los conceptos. Por qué se consideran como “servicios del ecosistema” a los valores religiosos, espirituales, y otros no materiales?, y además se los denomina como “servicios culturales”? y se plantean como “beneficios”?; esto es un error, y peor aún si los servicios del ecosistema están definidos como los “servicios que la gente obtiene”. Unos son los valores ambientales de los bosques y otros los valores culturales. Por qué incluir entre los valores ambientales a los culturales (incluyendo los “recreativos” que tienen otro carácter)? No sé si lo que se diga en las fuentes utilizadas en las definiciones, esté validado o aceptado por los pueblos indígenas, y no sé si se hizo algún tipo de consulta con ellos para poder definir los valores culturales de los bosques. Considero que esto merece una revisión. b) Los ecosistemas frágiles no necesariamente están cubiertos por los conceptos de intensidad escala y riesgo, a pesar de que así se mencione en el Preámbulo; tampoco se los menciona en el P9; por tanto deben ser explícitamente referidos.

Comments on glossary definitions related to Principle 6

Definition Biological Diversity

needs a subset for forest diversity and in it the attributes of diversity mentioned - age, height, species, diameter and genetic

Definition Ecosystem (used in Criterion 6.5)



should include "interdependent" as well

Definition Ecosystem function

- expand on the part where the term "such as" is used. This is critical in understanding and intent. Don't be brief on a very critical topic.

Definition Ecosystem Services

- as above the "such as " should be expanded (Carbon storage and carbon sequestration, standing and horizontal dead wood both coarse and fine, forest community health and resilience)

I think the social and spritual issues should be removed from this definition and if necessary included in envrionmental services.

Servicios del ecosistema: revisar formulación; ver comentario P6

Definition Environmental Values

Env Values- Include Energy and Material Resources

Please note that in Tenure the definition alludes to energy and material resources (minerals)

Unclear what this new definition will lead to.

Unclear what this new definition will lead to.

- c) should describe both surface water and aquifers

The use of expressions "environmental values", "ecosystem services", "landscape values" add a lot of complexity in the field level. The conception of a standard is to be accessible to users and ultimately to all FSC community.

Clarify this in the definition of HCV.

: Delete last sentence. e.g., biological diversity has intrinsic value independent of human and societal perceptions.

this definition needs work and I offer to help with this.

Definition Landscape values

Such undefined values as spiritual values shall not be included in standards for forest management. I guess we are all unable to conduct any follow-up on that kind.

Such undefined values as spiritual values shall not be included in standards for forest management. How to conduct any follow-up on that?

This is really nebulous, and not suitable in a text like this!

Such undefined values as spiritual values shall not be included in standards for forest management. I guess we are all unable to conduct any follow-up on that kind.

: I think the term we are looking for is "cultural landscapes", and interpretation should be built on the significant body of work conducted by the UNESCO World Heritage System in this regard. http://en.wikipedia.org/wiki/Cultural_landscape

Regarding Landscape Values definition. The proposed definition is unlikely to give managers any guidance in management decisions. The current definition of landscape is more



appropriate.

Valores paisajísticos: revisar formulación; ver comentario P6



Comments on Criterion 6.5

<p>Once again I would like to emphasize we have to be very careful with the use of the word "restore". It might lead to demands and huge consequences we cannot handle. I do not really see the positive effect of putting in this demand for restoring upon all those connected to the usual environmental assessments. What is the intention? Shall we for example start to fell trees and create extra dead wood in natural forests or what?</p>
<p>6.5 Depending on the history of the Management Unit, this could result in considerable work and cost, regarding restoration of natural ecosystems.</p>
<p>6, 6.5, 6.7, 6.8 - The word "restore" can lead to interpretation conflicts. Restore to what? It might lead to demands which are impossible to handle.</p>
<p>6, 6.5, 6.7. This text will put an unrealistic demand on the forest owner. Restore from what condition, to what? The present condition is the product from not only current management but also former land use. Restoration is not feasible with the cooperation with society and non-certified forest owners.</p>
<p>Once again I would like to emphasize we have to be very careful with the use of the word "restore". It might lead to demands and huge consequences we can not handle. I do not really see the positive effect of putting in this demand for restoring upon all those connected to the usual environmental assessments. What is meant? Shall we for example start to fell trees and create extra dead wood in natural forests or what?</p>
<p>6, 6.5 and 6.7 Challenging: Several criteria state that the Organization shall restore functions (6), areas (6.5), water (6.7) etc. Proposal: Use the words like "maintain" or "develop" or, alternatively, provide a clear definition of the word restore in the context.</p>
<p>6.5 Comment: The request for restoration of natural ecosystems is too demanding as it is very costly do to it successfully. Especially in FMU's where only degraded ecosystems can be found. I propose to delete the requirement of restoration from the criterion. In highly degraded/modified areas there is little if no ecological justification for categorically restore representative sample areas. FSC should take into use the concept of biodiversity offset instead of compulsory restoration requirement.</p>
<p>6.5 It is vital that these areas have properly formulated management objectives so that the success of management can be evaluated. In many cases set aside areas are simply abandoned to their fate with strongly negative consequences.</p>
<p>In relation to P6 and C6.5, there needs to be greater clarity about what constitutes maintenance and restoration of "ecosystem services, biological diversity". How is a forest manager (or a CAB or CAB assessor) going to determine whether restoration is required rather than maintenance, or the extent to which restoration or maintenance has been achieved? What is the baseline that is to be used if, for instance, natural ecosystem services have been impacted (a long time) prior to certification? Does "biological diversity" imply "indigenous biodiversity" given the constraints on the use of "alien species" in the Standard and if so, what implications does Principle 6 have for plantation managers growing exotic (alien) tree species?</p>
<p>The request for restoration of natural ecosystems is too demanding as it is very costly do to it successfully. Especially in FMU's where only degraded ecosystems can be found. I propose to delete the requirement of restoration from the criterion. In highly degraded/modified areas there is little if no ecological justification for categorically restore representative sample areas. FSC should take into use the concept of biodiversity offset</p>



instead of compulsory restoration requirement.
Criterion 6.5 and 6.7: these criteria state that the Organization shall restore areas (6.5) and water (6.7). Proposal: use the words like "maintain" or "develop" or, alternatively, provide a clear definition of the word restore. The expression "restore" raises the question on how to prove the direct responsibility of a given FMU and how to restore water courses.
In certain settings it is highly relevant to conserve and/or restore high biodiversity traditionally managed ecosystems. This needs to be reflected in the text. (e.g. certain grasslands)
C6.5 It would be clearer to add "...sample areas of natural ecosystems PROTECTED IN THEIR NATURAL STATE...." (I'm not yelling, I just put proposed new language in caps for ease of identification.) Operative verb must be "protect", not "conserve".
6.5 - please change "conserve" to "protect"
6.5 uses "conserve" instead of "protect" and is thus weakened
This language is lacking a crucial element from existing C6.4: that the representative sample areas be "protected in their natural state." This oversight is fundamentally unacceptable.
6.5: This language is also fundamentally insufficient to address the requirements of existing C10.5, and would thus unacceptably weaken the existing P&C. The requirements of existing C10.5 must be retained regardless of how existing C6.4 and the proposed new C6.5 are addressed. Existing C10.5 requires restoration of portions of existing plantations to natural forest conditions. By definition, existing plantations are not "samples of natural ecosystems," meaning that restoration of portions of existing plantations will not be triggered under proposed C6.5. Equally important, delineation of representative sample areas under existing C6.4 in at least some regions (including the US), tends to focus on relatively small and isolated forest areas. As such, the existing C6.4 approach is grossly insufficient to meet the objectives of existing C10.5, which should involve restoration of more significant and substantial portions of existing plantations, at least in regions like the US, where establishment of the plantations was purely detrimental to the conservation of natural forests. Note that in the US, 25% of larger plantation units are required to be restored to natural conditions under C10.5. Eliminating C10.5 would seriously jeopardize this absolutely crucial requirement of the US standard, at least when it comes time for that standard to be updated, if not sooner.
The language is also fundamentally unacceptable in that it replaces a clear requirement to "protect" representative sample areas with a requirement to merely "conserve" them.
Exp Notes from prior draft: "Conservation areas are areas of land and ecosystems actively managed, to provide a credible assurance of achieving any one or more of the following objectives:
(1) to ensure the long-term maintenance of viable populations of species resident in the Management Unit (Criterion 6.6), with special reference to rare and threatened species and their habitats (Criterion 6.4),
(2) to ensure the long-term maintenance of samples of natural ecosystems found in, or typical of, the Management Unit, including their characteristic age and size distributions and soil characteristics, with special reference to rare and threatened ecosystems and habitats,



and those that are vulnerable to disturbances, sufficient to serve as base-line reference points for detecting and monitoring environmental changes in other parts of the Management Unit (Criterion 6.5), and

(3) to establish and maintain natural ecosystems, adapted to the site (Criterion 6.5), as a contribution to the conservation of flora and fauna in the region (Criterion 6.6), and to their resilience and adaptability to climate change. Conservation Areas are managed in ways that provides credible assurance these and/or other objectives are achieved, to be determined case by case. This may require some interventions, and may not necessarily exclude other practices such as controlled harvesting. Conservation Areas may be moved from time to time within the Management Unit, when necessary to fulfill their objectives."

These objectives are extremely valuable, and should be included in the criterion in a more brief form, rather than being left to unenforceable notes.

Rationale from prior draft: "This criterion does not require that any portion of existing plantations be converted / restored to some natural ecosystem, as implied by the ambiguous original Criterion 10.5, which refers to "a proportion of the overall forest management area". As discussed above, this is a serious and fundamentally unacceptable weakening of the existing P&C on an issue that is absolutely central to the FSC's credibility and ecological effectiveness. Moreover, this sentence implies that C10.5 can not be successfully implemented, when in fact the FSC US standards have for years provided very clear indicators to implement C10.5. All Management Units are expected to manage sample areas for conservation, which may in some cases require that some planted areas be managed towards more natural ecosystems. This sentence is completely contradicted by the preceding sentence, and thus appears quite disingenuous.

10: The proposed revised P&C are also unacceptable inasmuch as the new language at C6.5 is fundamentally insufficient to address the requirements of existing C10.5. The requirements of existing C10.5 are extremely important to the FSC's effectiveness and credibility, and eliminating and/or weakening those requirements is absolutely unacceptable, regardless of where those requirements are addressed in the proposed revised P&C. Existing C10.5 requires restoration of portions of existing plantations to natural forest conditions. By definition, existing plantations are not "samples of natural ecosystems," meaning that restoration of portions of existing plantations will not be triggered under proposed C6.5.

Portions of existing plantations will be restored to natural forest conditions.

6.5 uses "conserve" instead of "protect" and is thus weakened

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6.5. is weakened by using "conserve" instead of "protect"

In certain settings it is highly relevant to conserve and/or restore high biodiversity traditionally managed ecosystems. This needs to be reflected in the text. (e.g. certain grasslands)

objection relates to the use of the word 'conserve' rather than 'protect' (from existing P&C), and thus a significant weakening.

Add "ecologically viable" to improve protection and add "and" to improve sentence structure per:



“The Organization shall identify and conserve and/or restore ecologically viable representative sample areas.....”

Comments: We think it is inappropriate to restore representative sample areas, the best way would be choosing slightly degraded forest sites to ensure the representativeness. The vegetation of such sites should be presented by different succession stages, if we speak about the main goals of the conservation of representative forest sites – their uniqueness. In addition, we think it necessary to retain the goal of conservation of representative forests – conservation of unique forests – as it was done in the previous version of the criterion. Such unique forests in their spontaneous development are necessary for preparation and adjustment of growth tables of different types of stands during the inventory works and for other purposes. In connection with this, we propose not to confuse the concepts of valuable ecosystems (HCVF), the main value of which is their natural functions, and representative - unique ones as the latter must be allowed to develop spontaneously and therefore, should be closed for any management activities. Representative sample areas may be equal to some kinds of HCVF when managed in such conservation regime

Comments on glossary definitions related to Criterion 6.5

Definition Landscape (also relevant for Criterion 9.1)

This definition of “landscape” is absolutely unacceptable for practical purposes. We recommend using other sources of information.



Comments on Criterion 6.6

This does not appear to refer to natural cycles, enhance, or restore, but requires the prevention of 'losses of biological diversity'. This may result in some re-thinking of the BC Standard which currently relies on RONV.
The criterion is not clear in restricting its scope to the FMU under evaluation.
The wording restore is unclear. To what conditions should things be restored to in areas with antroposopical exosure in long term temporal scale?
Crierion 6.6 requires management of viable populations that may no be applicable to the management unit. The population os wide ranging species may noit be affected by the management activities on a defined forest area.
This criterion can not be applied to most plantations. Should remove 1st sentence as it is duplicated in 6.4.
The Organization shall demonstrate that measures are in place to manage hunting, fishing, trapping and collecting.
Use the common terminology of conservation biology instead of complex expressions. For example, "effectively maintain the continued existence of the naturally-occurring native species" could be replaced with "effectively maintain viable populations...". However, the criterion fails to take into account the commonly faced situation where the populations have faced the stage of "living dead" before the operations have started/initiated. In such situations the responsibility of maintaining viable populations cannot be required from the organization.
Managing hunting, fishing etc. is in many countries under responsibility of the authorities and beyond authority of the organization - to be deleted.
To me are two different issues trated in just one criterion. I suggest to share in two criterion the requeriment to prevent losses of biological diversity from the requeriment of measures to prevent hunting, fishing, trapping and collecting.
a.We support the intent of this writing but it is actually unrealistic that companies shall be responsible for the continued existence of naturally-occurring species when the extinction of species may be related to conditions far way for the MU, e.g. migrating birds, climate change etc). This requirment is also impossible to monitor for all species. The writing risks lead to overexpectation and subsequent conflicts. We suggest that the criterion is rewritten as to address that the Organisation shall implement management activities that does not lead to forest degradation. The defintion of "forest degradation" needs to give room for a certain minor unavoidable simplification that will always be the case in the short term when logging in natural forests. b) The last sentence is too weak. Suggestion: "The Organisation shall ensure that any hunting, fishing, trapping and collecting is sustainable. "
this seems to have dropped key specific references to ecosystem function and processes compared to existing 6.3
6.6 - weaker than old criteria
is also weaker than the old criterion
This new language fails to incorporate absolutely crucial requirements from existing C6.3 for all silviculture to maintain and restore natural forest regeneration, succession, and tree, plant, and ecosystem diversity. Similarly, the proposed new language fails to maintain requirements to maintain and restore natural ecological cycles, such as natural fire regimes. This is fundamentally unacceptable. The proposed new language would allow serious



conversion of relatively natural forests to non-natural species mixes on the majority of management units (to maintain the “existence” of naturally occurring native species, one need only maintain them on the smallest portion of a management unit). Similarly, the proposed new language would fail to require sufficient restoration to natural conditions in cases where management units have already been seriously degraded by past management. And the need to maintain and restore natural ecological cycles would be completely ignored.

To be fully effective, the criterion should also reference “maintaining ecosystem functioning and biodiversity” (“ecosystem functioning “as defined in Explanatory Notes for 6.1).

Equally important, the new language fails to maintain a performance standard for “in the forest” outcomes that meet the intent of the criterion. Rather, it simply requires implementation of management activities that are thought to be effective, without any requirement for verification of whether they are actually effective “on the ground.” This substitution of a performance standard by process-based standard would unacceptably weaken the FSC and bring it closer to the discredited approaches used by greenwashing systems like the Sustainable Forestry Initiative.

The original wording of these criteria was much stronger. It is critical that silviculture to maintain and restore ecosystem function and biodiversity, natural forest regeneration, succession, and tree, plant, and maintain and restore natural ecological cycles, such as natural fire regimes in the certified area.

Language in 6.6 should address maintaining and restoring natural forests, and their ecosystem components and functions.

In 6.6, this new language fails to incorporate requirements from existing C6.3 for all silviculture to maintain and restore natural forest regeneration, succession, and tree, plant, and ecosystem diversity. Similarly, the proposed new language does not include requirements to maintain and restore natural ecological cycles, such as natural fire regimes.

6.6 is also weaker than the old criterion

6.6 is also weaker than the old criterion

6.6 is also weaker than the old criterion

6.6 is also weaker than the old criterion

There are 2 issues here. a. We support the intent of this writing but it is actually unrealistic that companies shall be responsible for the continued existence of naturally-occurring species when the extinction of species may be related to conditions far way for the MU, e.g. migrating birds, climate change etc). This requirement is also impossible to monitor for all species. The writing risks lead to overexpectation and subsequent conflicts. We suggest that the criterion is rewritten as to address that the Organisation shall implement management activities that does not lead to forest degradation. The definition of “forest degradation” needs to give room for a certain minor unavoidable simplification that will always be the case in the short term when logging in natural forests.

b. Last sentence is too weak. Suggestion: “The Organisation shall ensure that any hunting, fishing, trapping and collecting is sustainable. “

A weakening of the current 6.2 and 6.3 requirements

the new language fails to maintain a performance standard for “in the forest” outcomes that meet the intent of the criterion. Rather, it simply requires implementation of management activities that are thought to be effective, without any requirement for verification of whether



they are actually effective “on the ground.” This substitution of a performance standard by process-based standard would unacceptably weaken the FSC.

6.6 wording should reflect the need to at least maintain existing status or enhance where necessary. Now it allows for potential deterioration of species populations.

6.6- Naturally -occurring native SPP should be in viable proposition accross the management unit 7 not in patches.6.6 is not clear on this.



Comments on Criterion 6.7

<p>We cannot accept to have a demand for restoring (unclear to what) whole ecosystems, maybe not even at forestland, as described. How to deal with such a demand if the Organization has not been involved in the deterioration at all? In many cases such things occur due to climate change and extreme weather conditions. Maybe there is also a history of management from very long ago when the land was used for other purposes etc. This criterion would lead to very difficult processes.</p>
<p>The concept of aquatic connectivity is something new to this author and not sure that it is realistic.</p>
<p>6.7 issue is in restore especially in ephemeral waterways in steep broken country that has numerous ones. often there are tradeoffs between safety, env, productivity. restore over how long?</p>
<p>6, 6.5, 6.7, 6.8 - The word "restore" can lead to interpretation conflicts. Restore to what? It might lead to demands which are impossible to handle.</p>
<p>6, 6.5, 6.7. This text will put an unrealistic demand on the forest owner. Restore from what condition, to what? The present condition is the product from not only current management but also former land use. Restoration is not feasible with the cooperation with society and non-certified forest owners.</p>
<p>We can not accept to have a demand for restoring (unclear to what) whole ecosystems, maybe not even at forest land, as described. How to deal with such a demand if the Organisation has not been involved in the deterioration at all? In many cases such things occur due to climate change and extreme weather conditions. Maybe there is also a history of management from very long ago when the land was used for other purposes etc. This criterion would lead to very difficult processes.</p>
<p>6.6,6.7) The wording restore is unclear. To what conditions should things be restored to in areas with antroposophical exosure in long term temporal scale?</p>
<p>6, 6.5 and 6.7 Challenging: Several criteria state that the Organization shall restore functions (6), areas (6.5), water (6.7) etc. Proposal: Use the words like "maintain" or "develop" or, alternatively, provide a clear definition of the word restore in the context.</p>
<p>This criterion fails to recognize the cyclical nature of Plantations forest on water flows - particularly "seasonal" or ephemeral water courses. It also fails to account for the benefits of new forests in a previously long deforested landscape, and furthermore, it is too particular to individual water bodies and preferably should focus on catchment level impacts.</p>
<p>6.7 Concerned that restore as explained in the notes is to remedy and mitigate impacts. To be consistent with other use of this term remedy and mitigate should be used in the text.</p>
<p>Fully agree on protection but can not agree to restoration. There might be many different reasons why restoration could be needed. How to deal with such a demand if the Organization has not been involved in the deterioration? How to deal if such things occur due to climate change and extreme weather conditions, history of land management when it was used for other purposes etc.</p>
<p>The expression "restore" raises the question on how to prove the direct responsibility of a given FME and how to restore water courses.</p>
<p>Other concepts like "natural cycles and flows" and "aquatic connectivity" are absolutely not clear enough. The conception of a standard is to be accessible to users and ultimately to all FSC community.</p>



Suggestion: Simplification. Inclusion of specific demands/concepts on the standard using the text of the criteria, instead of remitting to broad, unspecific concepts.
Criterion 6.5 and 6.7: these criterions state that the Organization shall restore areas (6.5) and water (6.7). Proposal: use the words like "maintain" or "develop" or, alternatively, provide a clear definition of the word restore. The expression "restore" raises the question on how to prove the direct responsibility of a given FMU and how to restore water courses.
Need to include protection of water quality
C 6.7: the criteria needs to include reference to protection and/or restoration of water quality and quantity by comparison to natural ecosystem reference system. The criteria should provide guidance on the level of environmental performance expected.
"The Organization shall protect or restore ALL natural water courses and water bodies, and riparian zones, including WATER QUALITY AND QUANTITY, their natural HYDROLOGICAL cycles, and flows and aquatic connectivity." The criterion needs to more explicitly require protection and restoration of water quality to natural levels or, to use another benchmark, levels that support healthy populations of all native aquatic species and human consumption of the water. While existing C6.5 could have been more explicit about this point, it does explicitly require managers to "protect water resources," which is inherently includes water quality. Protection and restoration of water quality is absolutely essential to the FSC's credibility and effectiveness. However, the proposed new criterion does not require that the protection measures result in any particular level of environmental performance. As such, it is merely the type of process based standard more commonly associated with greenwashing systems like the Sustainable Forestry Initiative, and is not the type of performance based standard that the FSC's reputation and ecological effectiveness hinges on. As suggested above, the criterion also needs to explicitly state that "all" natural water bodies are to be protected. Otherwise, it would be possible to comply with the criterion while only protecting a percentage of the water bodies on a management unit. While surely not intended, this would be an unacceptable interpretation of the criterion.
The criterion also fails to maintain existing requirements to control erosion and minimize damage to other forest resources during harvesting, road construction, and other mechanical disturbances. While such provisions do not need to be in proposed C6.7 per se, such oversights are unacceptable – and the proposed new criterion in P10 does not comprise a sufficient substitute. There is also substantial value in explicitly requiring measures to address erosion, road construction, harvest, and other mechanical disturbance. It is not safe to assume that organizations and other parties will consistently assume that such measures are necessary to meet the proposed revised criterion. Equally important, without explicit language, the CBs will not be in a position to require such measures when organizations choose to overlook them. The same can be said for development and revision of national and regional indicators to implement the P&C.
needs stronger language addressing protection of all natural water bodies.
For 6.7, would change the language to the following: "The Organization shall protect or restore natural water courses, water bodies, and riparian zones. This includes protecting and/or restoring water quality and quantity, natural hydrological cycles, and aquatic connectivity."
6.7 Need to include protection of water quality
is to vague needs to more explicitly require protection and restoration of water quality to natural levels or, to use another benchmark, levels that support healthy populations of all native aquatic species and human consumption of the water.



Needs clarification to cover all water courses and to include intermittent natural flows. Also needs mention of protection of water quality.

Within 6.7 it should be clarified that this phrase applies to resources within the FMU: "The Organization shall protect or restore natural water courses and water bodies, and riparian zones, including their natural cycles and flows and aquatic connectivity." The revised wording should be similar to the wording used in 6.8.

Comments: We recommend clarifying the wording of the Criterion.

for existing plantations the question is really how much restoration is required toward natural conditions to meet the intent of Principle 6. In this regard we strongly recommend that the old C. 10.5 should be retained and added under P6. The new 6.5 refers only to maintaining or restoring representative samples of ecosystems not to restoring ecosystem functions in highly altered areas

Comments on glossary definitions related to criterion 6.7

Definition Connectivity

The disagreement related to the word "connectivity" is specifically directed to the concept of "water connectivity".



Comments on Criterion 6.9

<p>6.9 and 6.10 These criteria maybe risk to eliminate all kind of FSC certified forestry in Sweden and other Nordic countries! As we have found there is no definition of what shall be seen as semi-natural there is an obvious risk that almost all forestland might be classified as plantations after regeneration. Planting must be an accepted regeneration method even though maybe only one species is planted on areas where the ground conditions demand that, in order to have an acceptable plant survival rate (according to legislation). Some years after planting, normally other natural species show up and mix the tree population at the site. There must be a definition stating that our type of forests are seen as semi-natural and are allowed to be regenerated through planting.</p>
<p>6.9 Very concerned with the new definition of plantations. This could mean that the BC definition of plantations is not upheld and that current BC regeneration practices are not allowed. Further interpretation required.</p>
<p>6.9, 6.10 This criteria is impossible to accept using the current definitions of natural forests and plantations since it would imply that the silvicultural practices in the e.g. the Nordic countries are converting natural forests to plantations on a broad scale. Only natural forests or plantations are defined (Scope). Proposal: Re-introduce the concept of semi-natural forests. Such forests should be characterized the maintenance of structures, ecological functions and species composition across forest generations typically found in natural forests in the region.</p>
<p>6.9 With the definition of plantations set (with no alternatives in between natural forests and plantations) this is totally unacceptable. Proposal: Re-introduce the concept of semi-natural forests in the scope. Such forests should be characterized the maintenance of structures, ecological functions and species composition across forest generations typically found in natural forests in the region.</p>
<p>do not agree with the proposed revision to the defintion of plantation and so cannot support 6.9 and 6.10. The defintion of plantation must not include areas planted in indigeous species where, in combination with natural regeneration on a site, there is a natural range of species. Even if there are only a few. The original definition provided this and would be preferred.</p>
<p>6.9, 6.10 - These criterion are not functional in countries with semi-natural forests like for example Sweden. Since only natural forests and plantations are defined (Scope) these criteria implies that our silvicultural practices (that according to legislation include planting as a regeneration method) transforms natural forests to plantations and are therefore not qualified for certification. The concept of semi-natural forests must be re-introduced.</p>
<p>I am extremely concerned with the new plantation definition in the 4th Draft of the FSC P&Cs. This definition is a hugh change from the existing one and has an enormous affect on present and future FSC certifications in Canada and the United States. Many of the planted stands in these northern regions did not meet the old definition of a plantation and now they do. This is a big problem for Forest Companies and Certifying Bodies. In most cases under this new definition companies will not be able to meet Criteria 6.9 and 6.10 that deals with converting natural forest to plantations. There is nothing wrong with planting trees to meet all kinds of long term timber and ecological objectives on a Management Unit. Both criteria state that it must be done on "a very limited portion of the area of the Management Unit". This contradicts good forestry and greatly increases costs to meet these long term objectives; the cost benefit of being FSC certified would be gone. At J.D. Irving, Limited we will not be able to meet these criteria in Canada, where we have been seeking FSC certification, and we will likely lose our existing FSC certificate in Maine USA.</p>



I urge FSC International to reconsider changing the plantation definition. The old definition was effective at distinguishing the difference between planted stands that have key elements of native ecosystems and ones that do not. This is an important ecological distinction that needs to remain in the FSC standard for it to keep its gold star rating.

6.9 This criterion is impossible to accept; the current definitions of natural forests and plantations would imply that the silvicultural practices in the e.g. the Nordic countries are converting natural forests to plantations on a broad scale.

6.9 and 6.10 These criteria maybe risk to eliminate all kind of FSC certified forestry in Sweden and other Nordic countries! As we have found there is no definition of what shall be seen as semi-natural there is an obvious risk close to all forest land might be classified as plantations after regeneration. Planting must be an accepted regeneration method even though maybe only one species is planted on areas where the ground conditions demand that, in order to have an acceptable plant survival rate (according to legislation). Some years after planting normally other natural species show up and mix the tree population at the site. There must be a definition saying our type of forests are seen as semi-natural and are aloud to regenerate by planting.

6.9) See comment in preamble. We can not accept the sole definitions of plantations and natural forests.

6.9 Unacceptable: The Organization shall not convert natural forest to plantations (6.9). This criteria is impossible to accept using the current definitions of natural forests and plantations since it would imply that the silvicultural practices in the e.g. the Nordic countries are converting natural forests to plantations on a broad scale. Only natural forests or plantations are defined (Scope). Proposal: Re-introduce the concept of semi-natural forests. Such forests should be characterized the maintenance of structures, ecological functions and species composition across forest generations typically found in natural forests in the region. Comment: The definitions for "natural forests" and "plantations" are unclear and the explanatory notes mention only temperate forests, which are dominated by one or few species. It must be clarified that all forest types which are planted with natural tree species are regarded as natural forests and not as plantations. This is especially important for boreal or alpine coniferous stands. It should be also allowed to convert some forests for urban development, which might not produce secure and long term conservation benefits. I propose to replace the "and" between paragraph a) and b) with "and / or"

Section 6.9 in the explanatory notes there is a discussion of clarification for "a)" However if the Explanatory Notes are not mandatory it makes "a)" too vague. There should be no conversion. Section 6.7 - the term aquifer should be added.

6.9 The criterion as it stands is causing large scale conversion of 'non forest' natural habitats in Africa including areas of habitat types that have a much higher biodiversity conservation value than the forests they are associated with. For example afro-montane grasslands which are far more threatened than forests. The prohibition on conversion should be extended to include conversion of rare or threatened non-forest habitat types.

6.9 There are times when conversion may be appropriate, as per previous submissions regarding the situation for some NZ Maori. There needs to be some limited ability for a "derogation" in this case and I back the work that NZ Maori through George Asher are pursuing on this.

I disagree with very limited. Better a small portion that does not threaten and identified HCVs within the management unit



Suggested rewording:

- a) is limited to a small portion of the management unit
- b) does not threaten any HCVs identified within the management unit
- c) produces clear substantial

additional, secure long term* conservation benefits in the Management Unit,

The definitions for “natural forests” and “plantations” are unclear and the explanatory notes mention only temperate forests, which are dominated by one or few species. Concept of “semi-natural” forests missing. It must be clarified that all forest types which are planted with natural tree species are regarded as (semi)natural forests and not as plantations. This is especially important for boreal or alpine coniferous stands. It should be also allowed to convert some forests for “social benefits” (like urban development, tourism etc), which might not produce secure and long term conservation benefits. Propose to replace the “and” between paragraph a) and b) with “and / or”.

6.9 & 6.10. These criteria are a barrier to many organisations seeking FSC certification within Sabah, Malaysia and the region. Many of the FMU's have/or will have a substantial amount of ITP, where degraded forest has been permitted to be converted to ITP. More flexible criteria should be considered, whereby standards are set to identify circumstances where conversion can occur and identify how biodiversity losses will be compensated for. Offsets directed into an appropriate conservation area such as a Biobank within the same landscape will ensure gains can be commensurate with losses.

Criteria 6.9 and 6.10 could be revised and a third point added to allow for the certification of organisations under these circumstances:

“(The area converted, if not small), meets the conversion standards and has an acceptable restoration and/or a compensatory mitigation plan which achieves a clear, substantial, additional, secure long term conservation benefits within the landscape.”

A side event is being hosted by Sabah Forestry Department at the GA to discuss this issue and a discussion paper is being developed to explore options.

6.9 We support the intent of 6.9 but it is unrealistic that very small scale conversion to for example timberlandings and loggers cabins, should not be able to occur as they do not lead to direct conservation benefits. Such conversion will happen anyways.

The parameters for conversion of “very limited portions” should also include an express prohibition of any conversion of forest areas that provide habitat for rare, threatened, endangered, or other imperiled species.

6.9: Exp Note from prior draft: ““A very limited portion” is currently defined as “no more than 0.5% of the area of the Management Unit in any one year, and no more than 5% in total”. This definition may be modified by FSC, by due process (see FSC-STD-30-010 Controlled Wood Standard for Forest Management Enterprises and FSC-STD-40-005 Company Evaluation of Controlled Wood, FSC Glossary of Terms).” This 5% total cap on conversion at 5% is crucial; however, it should be clarified that this amount includes any conversion that has already occurred on the forest management unit. In some parts of the world, such as the U.S., forest ownerships often change hands repeatedly in short amounts of time. Allowing each forest owner to each convert 5% of the forest management unit would have disastrous results, i.e., total amounts of conversion in dramatic excess of 5%.



Exp Note from prior draft: "A forest is defined as (see also glossary) an area of land with a tree canopy cover of more than 10%, or of young trees able to reach 10% cover in situ. It does not include land used primarily for agriculture or urban use. Clarification: For FSC purposes, this includes areas of bamboo, palms, windbreaks, shelterbelts, rubber plantations and cork oak stands, if they reach the canopy cover criteria. It also includes the associated forest roads and other openings and gaps. Agroforestry systems and fruit tree plantations may be included for purposes of FSC certification, although they will not necessarily be included in internationally-agreed definitions of forests." This clarification is problematic in the context of this criterion. By defining as "forest" those plantings that would, in many locations, comprise non-natural plantations, the "clarification" may allow substantial and unacceptable forms of plantation conversion to be exempt from the criterion's prohibition on conversion. The clarification needs to be worded more carefully to prevent such outcomes.

We support the intent of 6.9 but it is unrealistic that very small scale conversion to for example timberlandings and loggers cabins, should not be able to occur as they do not lead to direct conservation benefits. Such conversion will happen anyways.

6.9 I am very surprised that as little as 10% of land covered by trees is defined as forest. For Kyoto Forest purposes in New Zealand the figure is 30%, and that is only for species able to reach a height of (from memory) 10 metres. It does not apply to trees not generally able to attain that height..

"does not occur in or threaten HCVs, nor any sites necessary to maintain or enhance those HCVs" - please please amend to "does not threaten HCVs, nor any sites necessary to maintain or enhance those HCVs" . This may seem like a minor grammatical point but it is actually crucial to the whole concept of moving away from HCVF to HCVs.

El criterio 6.9 no debería contemplar una excepción para convertir bosques naturales en plantaciones ó al menos, esta excepción debería tener mayor claridad en cuanto a los límites de % para la afectación de la unidad de manejo.

6.9 Llama la atención que bosque natural no haya sido definido como un ecosistema, y que solo haga referencia a los árboles (¡?). La definición debe ser revisada.

Comments on Criterion 6.10

Remark: Criterion 6.10 was not identified in the survey. However, it is strongly inter-connected with Criterion 6.9 as both are dealing with conversion. For this reason the comments on Criterion 6.10 are included in this compilation.

6.10 Should be okay, if the BC concept of plantations is considered for BC tenure holders, but depends on the interpretation of the plantation definition as above.

6.10 - Holding Organizations responsible for "indirect" responsibility is not clear. Clear metrics and definition are required. This should be only for areas where the Organization has 50%+ control.

6.10 the 1994 rule is becoming increasingly relevant with each passing year. I have been to some superbly managed forests that cannot meet FSC for this sole reason.

The original definition of 'Plantation' is strongly preferred. The new definition is so broad that all manner of forests with planted trees are lumped together when it fact there is a continuum of increasing intensity and declining ecosystem components. The current definition allows for national/regional evaluation of the issue and the setting of a standard. Please refer to the FSC Canada National Boreal Standard pg 115 Intent Box www.fscscanada.org for a detailed



<p>discussion. This matter has been effectively addressed in Canada through a robust FSC coordinated dialogue. The new definition (proposed) is too simplistic in application and removes all opportunity for regional-appropriate standards to be set.</p>
<p>6.10 plantation date is not performance based. If you purchase a plantation from a third party that was started in 1995, you can apply for certification. Planation management should remain performance based.</p>
<p>6.10 In order to prevent the worst forms of forest conversion to plantations that are going on in some African countries with a view to being sold on to new organisations who would then certify them, it is necessary to remove the second clause and perhaps include a new time limit and to say perhaps that these plantations may not be certified for 70 years post conversion regardless of who the managers are.</p>
<p>C6.10 November 1994 should never be used as a cut off date for plantations. Conversion should be permitted if it does not affect the HCVs within the management unit.</p>
<p>6.10: Con este criterio el FSC sigue impidiendo la certificación de áreas que si cumplen con todo el estándar (incluso este mismo criterio) a causa de que algunas partes de la UMF han sido convertidas después de 1994. Esta definición nos parece injusta y desfavorable para el FSC, especialmente en los casos en los que es posible: a) identificar las áreas convertidas post-1994, b) discriminar las áreas certificables de las convertidas post-94 en el bosque, c) reflejar dicha separación en la cartoigrafía, d) contar con registros y evidencia de la trazabilidad de una y otra fuente de abastecimiento, e) certificar las áreas post-1994 como madera contralada (para asegurar no más conversiones).</p>
<p>6.10 a) it is unrealistic that very small scale conversion to for example timberlandings and loggers cabins should not be able to occur as they do not lead to direct conservation benefits. Such conversion will happen anyways. b) There is no justification that the conversion area needs to be very limited if there are clear, substantial, additional, secure, long term conservation benefits in the MU. Suggest changing to “..... area of the MU and/or is producing ...”. c) We promote the replacement of the 1994-rule with another robust mechanism that would make demonstrably committed plantation companies that have converted post-1994 eligible for certification, while excluding risk for “planned conversion”.</p>
<p>C6.10 This codifies a big loophole whereby one owner clears the forest and then flips the cleared land or plantation to another owner who goes for FSC plantation and everyone washes their hands clean.</p>
<p>The proposed language fails to correct the immense loophole in the existing P&C that allows the certification of large amounts of converted natural forest, provided the conversion was conducted by a prior landowner. Because forest ownerships in some parts of the world change hands repeatedly and frequently, this provision effectively creates a gaping loophole in the FSC’s prohibition on certifying the conversion on natural forests to plantations and other land uses after 1994. To be certified by the FSC, plantations established through the conversion of natural forest after 1994 should be required to be in the process of being restored to managed natural forest conditions, with the management plan demonstrating clear intent to achieve this outcome as quickly as possible, and with initial implementation of the plan already well underway. We strongly recommend that C6.10.a be edited to correct these problems. The new FSC US Standard includes language which provides a good model for such edits. Alternately, the revised P&C should at least replace the “or” between subparagraphs “a” and “b” with an “and,” to limit the scope of allowable pre-existing conversions.</p>
<p>Not sure how criteria 6.10 will adequately prevent conversions.</p>
<p>6.10 a) We support the intent of 6.10 but it is unrealistic that very small scale conversion to</p>



for example timberlandings and loggers cabins should not be able to occur as they do not lead to direct conservation benefits. Such conversion will happen anyways.

b) There is no justification that the conversion area needs to be very limited if there are clear, substantial, additional, secure, long term conservation benefits in the MU. Suggest changing to “..... area of the MU and/or is producing ...”

c) We promote the replacement of the 1994-rule with another robust mechanism that would make demonstrably committed plantation companies that have converted post-1994 eligible for certification, while excluding risk for “planned conversion”.

Because of the turnover in forest ownership, [The proposed language fails to correct the immense loophole in the existing P&C that allows the certification of large amounts of converted natural forest, provided the conversion was conducted by a prior landowner. Because forest ownerships in some parts of the world change hands repeatedly and frequently, this provision effectively creates a gaping loophole in the FSC’s prohibition on certifying the conversion on natural forests to plantations and other land uses after 1994. To be certified by the FSC, plantations established through the conversion of natural forest after 1994 should be required to be in the process of being restored to managed natural forest conditions, with the management plan demonstrating clear intent to achieve this outcome as quickly as possible, and with initial implementation of the plan already well underway. We strongly recommend that C6.10.a be edited to correct these problems. The new FSC US Standard includes language which provides a good model for such edits. Alternately, the revised P&C should at least replace the “or” between subparagraphs “a” and “b” with an “and,” to limit the scope of allowable pre-existing conversions.]

6.10 b – i smell a loop hole which the less fastidious CB’s may advise their clients of which is to buy equivalent sites from each other in order to break that link – I think this could be over come by adding a clause that the organization is not involved in conversion on other parts of their holdings

6.10 We are concerned that the requirement for clear and convincing evidence of no responsibility will not be reliable.

November 1994 is an arbitrary date. It diminishes the full expression of legal or customary rights indigenous peoples and local communities have.

6.10, a) Las explicaciones para no incluir los HCV en este criterio son un poco “extrañas”, en especial la primera; si ese fuera el criterio para esta revisión, algunos cambios no se podrían haber podido hacer, verdad? b) El anterior criterio decía “may be allowed”, lo que implicaba un examen para determinar si era posible aceptar esa conversión; ahora se dice “except where”, que implicaría una decisión ya tomada.

I am still unhappy with the cut off date rule.



Comments on Criterion 7.6

<p>It is not reasonable to include all interested stakeholders in planning. Only when relevant. And it is absolutely not relevant to include stakeholders in the monitoring processes if there is not a special case where it is needed. Once again: extra work, extra costs, inefficient processes, negative work environment impact on personnel, decreased financial return etc will be the case.</p>
<p>Could be more work, depending on the interest and availability of stakeholders.</p>
<p>Too detailed demands on the content of the information sharing and engagement with affected stakeholders. This should not be prescribed on the level of a criteria but may be suitable indicators under certain conditions. This concern is even more relevant for small landowners (SLIMF).</p>
<p>Transparent response to interested stakeholders may lead to extreme and irrelevant requirements from stakeholders. Proposal: Include “proportional to scale, intensity and risk”.</p>
<p>Too detailed demands on the content of the information sharing and engagement with affected stakeholders. This should not be prescribed on the level of criteria but may be suitable for national indicators under certain conditions. The demand to reproduce the management plan in total (excl. confidential information) to affected stakeholders might sounds like a good idea from a transparency point of view but is not realistic with 3.3 million ha of forest land.</p>
<p>Transparent response to interested stakeholders may lead to extreme and irrelevant requirements from stakeholders. Proposal: Include “proportional to scale, intensity and risk”</p>
<p>Stakeholders should only be included in the planning and monitoring processes if there is a specific case where it is needed. We must avoid inefficient and time-consuming processes.</p>
<p>Interested stakeholders should play a verry limited role in the management of privately held lands. Motives for being interested in the management of lands can be far to varied to allow for interruption of proper forest management.</p>
<p>It is unacceptable that the forest owner must involve “interested” stakeholder in the planning process. This is a much too vague definition. In our mind, “interested “ could just have been “any”. For economical and juridical reasons it is not possible to involve stakeholders in all types of management. For instance, determining long-term annual harvesting plans, which is a vital part of management, contains confidential economical information and is not suitable for stake-holders.</p>
<p>It is not reasonable to include all interested stakeholders in planning. Only when relevant. And it is absolutely not relevant to include stakeholders in the monitoring processes if there is not a special case where it is needed. Once again: extra work, extra costs, inefficient processes, negative work environment impact on personnel, decreased financial return etc will be the case.</p>
<p>Too detailed demands at the criteria leve. 7.6 Include "proportional to scale intensity and risk" in terms of information required to share with interested stakeholders.</p>
<p>What does "transparently" mean? What expectation is being set here? It must be clearer.</p>
<p>Unacceptable: Too detailed demands on the content of the information sharing and engagement with affected stakeholders (7.5, 7.6). This should not be prescribed on the level of a criteria but may be suitable indicators under certain conditions. This concern is even more relevant for small landowners (SLIMF). Comment 7.6: Focus should be only on affected stakeholders. The last sentence of the criterion about transparent response to</p>



interested stakeholders for engagement in planning and monitoring should be deleted. Legal limitations for engagement should be also included/recognized.
The word stakeholder is presumptive and insulting to the realization of the importance of forest communities to all life forms. It unnecessarily disenfranchises many of our global population.
C7.6 should explicitly require detailed records to be kept of engagement with affected and interested stakeholders.
We also believe that Draft 4-0 calls for more “engagement of local communities and stakeholders” than the previous P&C. As one reads Draft 4-0 it becomes increasingly unclear whether or not Management has any authority aside from what is granted by “local communities and stakeholders”. Draft 4-0 needs to limit engagement. In the United States for publically-held companies, engagement is limited by law to the extent that important information must be shared equally with all potential investors.
FSC is disproportionate to social elements. This is a Planning Principle that should focus on PLANNING of management that includes long term and operational. This is NOT brought out in the current Principle.
Please add a criteria on operational planning as recommended earlier.
Planning usually involves also handling of confidential information. It is also not reasonable to include all interested stakeholders in planning. Only relevant stakeholders for relevant parts. And it is absolutely not relevant to include stakeholders in the monitoring processes if there is not a special case where it is needed (agree that non-confidential monitoring results should be available). Legal limitations for engagement should be also included/recognized.
(New Criteria - Operational Planning) The Organization shall include operational planning that clearly defines specific forestry operations to sustain resources and minimize negative impacts on environmental and social elements, proportionate to scale intensity and risk of management activities.
Too detailed demands on the content of the information sharing and engagement with affected stakeholders. The budget for this can affect directly the purpose of economic viability.
Tornará extremamente complicado o plano de manejo quando preve o engajamento das partes interessadas de forma proativa e transparente.
should be re-written to include a commitment to engage with and involve interested stakeholders in the planning and monitoring. As currently written, "no" is an acceptable response as long as it is done transparently.
7.6 - weakening of language on stakeholder participation.
7.6 weakening of language on stakeholder participation
7.6 weakening of language on stakeholder participation
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7.6 weakening of language on stakeholder participation
7.6 weakening of language on stakeholder participation
7.6: a weakening of language on stakeholder consultation
Would suggest changing 7.6 to, “Organization seeks and considers input in management planning...”
The word "transparently" in 7.6 is undefined and should be removed.
7.6 Suggested rewrite: "The Organization shall proactively and transparently engage* affected stakeholders* in its management planning and monitoring processes as well as respond transparently to requests by affected stakeholders for their engagement in these



aspects."
Re: 7.5/7.6 We will not vote in favour of a revised P&C which maintains this diminishment of engagement and respect of stakeholders with legitimate interest in management. The distinction between the rights of interested and affected stakeholders cannot be maintained. Simply because an area is remote from any settlement does not diminish the importance of engaging interested parties such as research bodies or NGOs who have worked for years in the area. Also recommend adding to 7.6: "and input from stakeholders has been demonstrably integrated into the Organizations plans and activities."
La última frase de la nota explicativa 2 se ha mantenido, y puede causar conflictos. Al menos se debería añadir: ..., "y deberá explicar por escrito las razones para no hacerlo".

Comments on glossary definition related to Criterion 7.6

Definition Affected Stakeholder

Too wide definition. Take away "but are not restricted to".
Too wide definition. Take away "but are not restricted to".
A very wide definition
Remove "bur are not restricted to"
The definition of Affected Stakeholder is too broad. It should be limited to stakeholders that can document a legitimate impact.
Too wide definition. Take away "but are not restricted to".
Affected stakeholder - Too wide definition.
2.- Affected stakeholder / Actor afectado: Es innecesario incorporar esta definciion compuesta ya que se define muy bien "Actor" y esta claro a que se refiere la palabra "afectado"
: object to differing treatments of affected vs interested stakeholders in P&C, plus there is no definition or distinction between stakeholders and rights-holders, with the latter being lumped into the former.
Affected Stakeholder: This should be expanded to more explicitly include persons and organizations with an interest in public trust resource values present in the Unit, e.g., wildlife habitat, water resources, etc., regardless of whether they are downstream or adjacent to the Unit.
our only change is for Affected Stakeholders which needs to include those persons or groups that have an interest in forest and water conservation and forest management regardless of where they live.
Affected stakeholder... suggests that we are not all affected by the loss of biodiversity, which of course we are.
Comments: We recommend clarifying the concept "affected stakeholder" for better understanding by specifying which stakeholders are affected and why, and extend the list of affected stakeholders.
: it is convenient to add to person, group of persons or entity that is or may be subject to the effects of the activities of a management unit: "at local, regional or national level".

Definition Interested Stakeholder

Maybe the definition is OK, but it is not OK to give this type of stakeholder the same status and possibilities for information and consultations as affected.
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Maybe the definition is OK, but it is not OK to give this type of stakeholder the same status and possibilities for information and consultations as affected.

see comments on affected stakeholder

Definition Stakeholder

if you cannot see the wisdom in removing it - at least open it up. The term is as useless as "sustainable" and worse it is presently abused to diminish broad social input.

Stakeholder - remove it and anything like it.

see comments on affected and impacted. Missing definition of affected rights holder, eg customary use rights or tenure rights of Indigenous peoples.

Definition Engaging and engagement

It's wrong to define the outcome of an engagement shall be ensuring all these concerns are considered. It's more accurate to define it as a process of dialogue relevant to the issue, without deciding the stakeholders shall be happy with all aspects of the dialogue. Interested stakeholders shall not be included here. Try to reformulate.

It's wrong to define the outcome of an engagement shall be ensuring all these concerns are considered. It's more accurate to define it as a process of dialogue relevant to the issue. Interested stakeholders shall not be included here. It should be activities instead of management plan.

Engaging and engagement

It's wrong to define the outcome of an engagement shall be ensuring all these concerns are considered. It's more accurate to define it as a process of dialogue relevant to the issue, without deciding the stakeholders shall be happy with all aspects of the dialogue. Interested stakeholders shall not be included here. Try to reformulate.

Implicación no parece un término equivalente a engagement. Al menos no es un término de uso frecuente en el español. Quizás involucramiento sea más apropiado.

Implicación: No es el término más adecuado en español



Comments on Principle 9

<p>We do not accept that the concept now is broadened to cover other areas than forests. The scope for FSC is forest management that is why forest companies are FSC FM certified. We have no clue what this new concept would lead to. You are risking the whole original concept.</p>
<p>The language under each criteria implies an increased level of consultation, consideration and more work to ensure agreement about the HCV and that they are being taken care of and improved upon adequately.</p>
<p>9 We cannot accept the concept now is broadened to cover other areas than forests. The scope for FSC is forest certification.</p>
<p>Since HCVF has become HCV and the scope of the P&C (Preamble) include "non-forest vegetation types" it is important to state that HCV only includes values that is linked to forest, if not forest it self.</p>
<p>The change from HCVF to HCV is not clear. It says "focus on any ecosystems, not only forests" But the value must be linked to the forest resource. Clarify this or go back to HCVF.</p>
<p>We do not accept the concept now is broadened to cover other areas than forests. The scope for FSC is forest management, that is why forest companies are FSC FM certified. We have no clue what this new concept would lead to. You are risking the whole original concept.</p>
<p>9) No longer limited to forest. The values regulated in the forest standard must address forest related values.</p>
<p>Principle 9 text: no longer limited to forests, but all conservation values (9). The motivation behind this is to focus on the values that are to be maintained or enhanced. These values should, however, always be linked to the forest resource as such. Proposal: clarify this in the definition of HCV.</p>
<p>Comentário: Deve realmente tratar somente dos valores/serviços ambientais, necessidades comunitarias ou valores culturais excepcionais.</p>
<p>P9 Need to include some aspects of dimensions.Suggest something like "...the High Conservation Values in their full measures in the MU, applying the precautionary approach."</p>
<p>General comment: P9 should be titled, "Maintenance of High Conservation Values"</p>
<p>P9: The existing P9 text does not need to be changed and should be retained.</p>
<p>Principle - Concerned about the word "enhance". We prefer "restore"</p>
<p>P9 we are concerned about "enhance" without a clear reference and prefer "restore"</p>
<p>9: "The Organization shall maintain and/or enhance ALL the High Conservation Values* in the Management Unit through applying the precautionary approach*. The language should be further revised to read "...and/or enhance all the High Conservation Values..." While it was implicit in existing P9 that all HCV occurrences must be protected, it is not sufficiently implicit in the proposed new language. Failure to require explicit protection of all HCV occurrences would be completely unacceptable.</p>
<p>9: The proposed revision is also unacceptable inasmuch as it fails to maintain existing P9's clear performance standard for outcomes that "maintain or enhance" HCV forest attributes. By saying "...through applying the precautionary approach," the new language opens the possibility that any application of any form of the precautionary approach will suffice, even if it is not in fact sufficient to consistently protect and restore all HCV occurrences on the ground. We strongly recommend something closer to the existing P9 approach, whereby a</p>



clear performance standard is maintained, while use of the precautionary approach is also encouraged, but not to the detriment of the performance standard
9: See our comments at P1, P6, and below with regard to the unacceptable loopholes that are likely to be created by reframing the principle solely in terms of “the organization.”
9 The Organization and all others active on the certified land base
P9 we are concerned about “enhance” without a clear reference and prefer “restore”
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P9 we are concerned about “enhance” without a clear reference and prefer “restore”
Note for P9 text - Need to include some aspects of dimensions. Suggest something like “...the High Conservation Values in their full measures in the MU, applying the precautionary approach.”
principle 9 needs clear performance standard for outcomes that “maintain or enhance” HCV forest attributes. By saying “...through applying the precautionary approach,” the new language opens the possibility that any application of any form of the precautionary approach will suffice, even if it is not in fact sufficient to consistently protect and restore all HCV occurrences on the ground. We strongly recommend something closer to the existing P9 approach, whereby a clear performance standard is maintained, while use of the precautionary approach is also encouraged, but not to the detriment of the performance standard.]
[As suggested above, the language should also be further revised to read “..and/or enhance all the High Conservation Values...” While it was implicit in existing P9 that all HCV occurrences must be protected, it is not sufficiently implicit in the proposed new language. Failure to require explicit protection of all HCV occurrences would be completely unacceptable.]
P9: Replace ‘enhance’ with ‘restore’.
Principle 9. This principle is flawed based on the definition of Precautionary Principle. Please see our comments in the glossary section.
Adaptation shall specifically refers to the need of adapting to climate change
Comments: The principle drastically changed making it more difficult for the enterprises to understand the sense, as the previous versions offered a concrete object – a forest with values. In connection with this, there is a risk for assessment of conservation values which may bring the opposite result when the values are retained while the forests are not. Interested stakeholders should be engaged to making decisions on this issue. On the other hand, experts may be engaged who will easily prove the availability of above-mentioned values in commercial forests; as a result, the undisturbed forest sites will surely fail to avoid the harvest
I would love to see the results of discussion between FSC and the HCVRN which happened in January this year. Will FSC provide guidance on the HCV identification, management and monitoring?
P-9- Existance of HCV areas should be assessed by others than organisations.

Comments on glossary definitions related to Principle 9

Precautionary Approach



The proposed definition FSC is using is from Rio 1992. It is considered a “weak” definition. There are “stronger” definitions that should be used, such as one from 1998: “When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically.” (The Wingspread Conference on the Precautionary Principle was convened by the Science and Environmental Health Network).

The definition here is considered a “weak” definition, which means that the threshold for acting is high. The threshold is reached when “management activities pose a threat of severe or irreversible damage” . That is too high a hurdle, especially to apply to High Conservation Values protection. Much environmental damage is the result of apparently modest but cumulative actions that result in loss. But such actions may not, at any given point, appear to pose a “threat of severe or irreversible damage



Comments on Criterion 9.1

<p>We can absolutely not accept "local communities and other stakeholders" must be engaged in what shall be seen as HCV. When the concept also shall cover other areas than forest land it risks to really cause a lot of problems to the certified Organization. It is of course relevant to engage authorities and indigenous people in specific cases, but the inclusion of ecosystem services, community needs, and cultural values of e.g. global significance religious/sacred importance is to go much too far. Go back to the previous concept with HCVF, values on forestland that our certification primarily shall be about.</p>
<p>It is not acceptable that these values should be identified in cooperation with local communities, rather it should be done on a national level, such as authorities. To secure a relevant approach, the level at which such engagement should be done must be decided by national initiatives based on regional context. Proposal: Include "proportionate to scale, intensity and risk" in the criterion.</p>
<p>The demand to identify the values in cooperation with local communities is undermining the concept of HCV. There must be some proportion of this. Proposal: Include "proportionate to scale, intensity and risk".</p>
<p>It will be extremely difficult to define high conservation values in cooperation with local communities. The result will vary with each case. This must be done by the national initiatives, based on a regional context. Include "proportionate to scale, intensity and risk" in this criterion.</p>
<p>We can absolutely not accept "local communities and other stakeholders" must be engaged in what shall be seen as HCV. When the concept also shall cover other areas than forest land it risks to cause really a lot of problems for the certified Organisation. It is of course relevant to engage authorities and indigenous people in specific cases, but to include ecosystem services, community needs and cultural values of e.g. global significance religious/sacred importance is to go much too far. Go back to the previous concept with HCVF, values on forest land that our certification primarily shall be about.</p>
<p>The level of engagement should be decided by the national initiatives. Include proportional to scale, intensity and risk in the criterion.</p>
<p>Text Unacceptable: To identify these values in cooperation with local communities. To secure a relevant approach, the level at which such engagement should be done must be decided by national initiatives based on regional context. Proposal: Include "proportionate to scale, intensity and risk" in the criterion. No longer limited to forests, but all conservation values (9). The motivation behind this is to focus on the values that are to be maintained or enhanced. These values should, however, always be linked to the forest resource as such. Proposal: Clarify this in the definition of HCV.</p>
<p>9.1 Proposal: FSC has signed an agreement with the HCVRN and we propose that FSC uses also the definition for HCV from the HCVRN.</p>
<p>The revision of Principle 9 (especially Criterion 9.1), while perhaps worthy in sentiment, significantly expands the emphasis on and scope of HCVs in the P&C and consequently looks likely to result in major new costs (particularly consultation costs) for FSC certificate holders. There is a clear question whether such additional "consultation" and its associated costs will result in better outcomes in many situations as the conservation values of many forest features are well protected or enhanced simply by being incorporated within a forested mosaic, particularly when compared to the alternative uses for the land that may arise, and this is particularly true in a plantation forest situation in New Zealand for example.</p>



Furthermore, the revisions have the potential to cede undue and unreasonable influence to the opinions of non-expert third parties.
9.1 I believe that the criterion is simply too long. It should be possible to refer to HCV 1 - 6 with the title of each HCV and to leave the detailed descriptions of the HCVs to the guidance notes.
FSC has signed an agreement with the HCVRN and I propose that FSC uses also the definition for HCV from the HCVRN
there are several kinds of risks here and they are not all clearly identified. The most important risk that needs to be addressed is the risk that the assessment process will fail to identify a HCV where one exists. The criteria needs to be clear that compliance is consistent with demonstrating that the assessment process has been sufficient to reduce that risk to a minimum. Again, the way this criteria is written is a little unclear. What does it mean, "...matching the likelihood of their occurrence and proportionate to the scale, intensity and risk of impacts of management activities." Note that high carbon stock forested landscapes and carbon pools should be an explicit HCV. This would include carbon rich forested peat soils.
HCV2 lacks the word "unfragmented"
HCV2 lacks the word "unfragmented" in the context of large landscape-level ecosystems
It is deeply flawed to make the survey for HCVs and other sensitive resources contingent upon pre-existing risk determinations. Risk determinations should be based upon informed assessments about the existence of HCVs. Risk determinations made in the absence of HCV assessments are inherently likely to underestimate the risk of impacting HCVs, thus failing to trigger HCV assessments and protection.
Consultation with relevant experts and databases should also be explicitly required, in addition to stakeholder consultation. This is not sufficiently implicit in the language calling for "other means and sources." In many cases, stakeholders alone will not be a sufficient source of information. Equally important, the organization and CBs should be utilizing the best data sources available.
Exp Notes from prior draft: "'Likelihood of their occurrence": The intensity of assessments (like many other FSC requirements) should be proportionate to the scale, intensity and risk of negative impacts of management activities. For HCVs, the intensity of assessments should also take account of the likelihood of discovering any HCVs. If local expert and stakeholder opinion has a clear consensus opinion about what HCVs are believed to occur, and especially if the danger of negative impacts of management is minimal, then it should not be necessary to carry out detailed and costly surveys at an early stage. For example, if "rare or threatened ecosystems" are known to occur, if they are not believed to be at risk, and if the area is assigned to full protection, then detailed biological enumerations are not always or immediately necessary." It is deeply flawed to make the survey for HCVs and other sensitive resources contingent upon pre-existing risk determinations. Risk determinations should be based upon informed assessments about the existence of HCVs. Risk determinations made in the absence of HCV assessments are inherently likely to underestimate the risk of impacting HCVs, thus failing to trigger HCV assessments and protection.
The Organization, in consultation with relevant experts and through stakeholder engagement* including local, regional and national conservation groups. It is not enough to just have the organization identify HCVs.



for 9.1, would suggest the following changes to definitions:

HCV 1 Species Diversity: "Concentrations of biological diversity* including concentrations of endemic species, or rare, threatened or endangered* species, that are recognized as significant at global, regional or national levels." Need to repeat "concentrations of" as a qualifier. Rare species are already covered under P6. To be consistent, HCV areas should be at a coarser scale than individual occurrences of RTE spp.

HCV 4 - Strange not to include carbon storage, etc. as a critical ecosystem service. Critical ecosystem services: Basic ecosystem services* in critical situations, including protection of critical water catchments, carbon storage and sequestration, and control of erosion of critically..."

9.1 HCV2 lacks the word "unfragmented" in the context of large landscape-level ecosystems

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9.1: Add 'unfragmented' to HCV2 definition,

9.1 HCV 4 Critical is not defined. Are all catchments that provide water to human settlements critical? Are they critical if natural assets depend on them?

HCV 6 again critical is not defined. Some heritage is of great significance to the local community but it seems to not be included. Where a country is large ie Australia, there are numerous sites not recognised nationally because Heritage is often managed at a State level. Regional needs to be included here.

Given that FSC now has a definition for "local communities", should HCV5 be changed to Local Community Needs? HCV 5 and 6 should be combined into one HCV category for "Cultural Values and Needs".

9.1 I think HCV 2 is far too ambiguously described and globally variable, and therefore difficult/impossible to assess. I suggest its removal from the list of HCVs.

9.1 HCV 2: The term landscape-level ecosystems does not make sense because a landscape is almost always comprised of many ecosystems. Rather use landscape level conservation values or habitats or some other term. Generally the use language in HCV 2 is loose and imprecise. It first says Landscape-level ecosystems and mosaics, why does it not say landscape -level ecosystems and ecosystem mosaics as it does in the second clause? The way it is written it is indicating three things here; 1. Landscape-level ecosystems, landscape-level mosaics and ecosystem mosaics. I don't think this is the intention though and if it is it could be expressed more clearly. This should be re-thought and tidied up.

This is further confused by HCV 3 which refers to Ecosystems and Habitats. (I imagine that a great deal of debate must have gone into the selecting these terms but I don't think we have got it right yet.)

In HCV 4 I think the term BASIC ecosystem services here is not informative. What does basic mean here? If it is used then it should be defined.

9.1 HCV 4: Incluir explícitamente climate regulation. Se insiste, además, en incluir a vulnerable peat deposits. Incluir también a Indigenous peoples.

I agree with the workshop on HCV that the definitions of HCV should be revised a bit and HCV5-6 better clarified



Comments on glossary definitions related to Criterion 9.1

High Conservation Values

Go back to the previous concept defining the values are about forests (HCVF).
Go back to the previous concept defining the values are about forests (HCVF). Cannot accept that these values should be identified together with local communities.
It is important to link HCV to forests in some way or another.
Go back to the previous concept defining the values are about forests (HCVF).
HCV3 Unclear because a pond can be a habitat/ecosystem and the individual pond may be threatened - it can not be classified as a HCV site. Need to state scale clearly - an ecosystem or habitat in this context consists of all the peices making up that habitat in the landscape
missing high carbon landscapes, including peatlands
HCV: add 'unfragmented' to HCV2 definition, and clarify the convoluted HCV6 definition. Also need clarity that a move to HCV from HCVF does not mean that FSC still requires the protection of areas of forest that have HCV values, particular for values that are particular to the area involved e.g. large unfragmented landscape level forests.
HCV doesn't define critical. HCV2 needs to recognise connectivity and significance of remnant within say a heavily cleared landscape. Scale and size are relative. Also regional is not defined.
HCV 5 and 6 could be combined as "Cultural Values and Needs". It is not clear if individuals or families can be defined as "local communities" or what the differences are (if any) between affected or interested stakeholders and local communities.
HCVs: I don't like HCV 2 due to broad range of interpretation and difficulty to assess and audit.
There is no reference to the source of definition of "high conservation value". We recommend specifying the source of the definition of this term
HCV. Incluir en HCV4 Climate change, Critically vulnerable peat deposits. También Indigenous Peoples.

Refugia

would prefer term more tailored to population biology usage, such as, "In biology a refugium (plural: refugia), sometimes termed simply a refuge, is a location of an isolated or relict population of a once more widespread species. This isolation (allopatry) can be due to climatic changes, geography, or human activities such as deforestation and over-hunting." http://en.wikipedia.org/wiki/Refugium_%28population_biology%29
The Refugia definition does not see broadly applicable (e.g., the terms "isolated" and "extensive" may create inconsistent interpretations).

Definition Landscape (also relevant for Criterion 6.5)

This definition of "landscape" is absolutely unacceptable for practical purposes. We recommend using other sources of information.
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Comments on Criterion 10.1

<p>We cannot accept that the regeneration shall lead to something unspecific called "pre-harvesting or natural conditions". As described earlier our semi-natural forests have to be planted to fulfil legislation demands for regeneration.</p>
<p>The wording "Pre-harvesting or more natural conditions" is unprecise and excludes semi-natural forests.</p>
<p>Implies that operations must ALWAYS move operations towards a "more natural condition". Is this the intent? This is normative and FSC needs to be VERY clear about what it is REQUIRING.</p>
<p>This is most unclear. However the Swedish legislation demands a fast regeneration, often by planting, so this can not be accepted.</p>
<p>Regeneration is a form of disturbance, that for many years result in a vegetation cover that is different from pre-harvest or natural conditions.</p>
<p>We can not accept the regeneration shall lead to something unspecific called "pre-harvesting or natural conditions". As described earlier our semi-natural forests have to be planted to fulfil legislation demands for regeneration.</p>
<p>10.1) The level of "pre harvesting conditions is unclear".</p>
<p>Comments: 10.1 and 2: It must be made clear that Climate Change can make it necessary to change to tree species, which have not been there pre-harvesting and which might not be natural in historic perspective but suitable for the future. The version D3-0 reflected this much better because it refers to "ecologically well adapted to the site and the management objectives" and should be used.</p>
<p>It must be made clear that for example Eucalyptus can also in the future be used in plantations after harvesting and also for the establishment of new plantations on degraded land, which have been harvested long time ago (before 1994).</p>
<p>Explanatory note 1 and Criterion 10.3 are unreasonably inflexible. It should allow for the application of current knowledge, future research and management techniques that are effective in controlling species that have invasive tendencies in certain situations.</p>
<p>There is no recognition of forest types that can be regenerated naturally. Where this is possible it should be mandatory and artificial regeneration be reserved for opportunity planting or previously converted forest units.</p>
<p>10.1 The use of the term 'more natural conditions' assumes that man is not part of nature. We know that for many ecosystems that it is the intervention of man in the system that is responsible for the present biodiversity components of the system. It makes a value judgement about human intervention in forest that assumes it is always a bad thing. If we have set the objectives for the future forest in terms of the mixture of species and size classes then this is the objective we should seek to achieve, not some idea about what is 'natural'. It is also likely that we do not want a forest that is in its preharvesting condition but a forest that is better able to meet our demands for a flow of goods and services. For the promotion of HCVs we may specifically want to encourage forest that is not natural but meets some specific requirements for the HCV in question. In summary YES we should regenerate the forest but we should do so in a way that meets the management objectives for the forest which have been set in principle 7.</p>
<p>Very challenging: The regeneration shall aim result in pre-harvesting or more natural conditions in a timely fashion (10.1). Native species and local genotypes unless "clear and convincing justification" (10.2). The criterion should not give reference to genotypes at all.</p>



The definition of alien species (natural past or present distribution). Criteria 10.3. Use of pesticides (10.7), fertilizers (10.6) and biological agents (10.8) are all more restrained and this will cause further limitations to the productivity of forests.

10.1 is trying to reflect sustained yield. "timely fashion" poor wording for: planned harvest cycle.

This more reflects clear cutting in plantations. Not applicable to many natural forests.

Operational procedures should be a priority and move to 10.1

10.1 Written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources

10.1. Can not accept the regeneration shall lead to pre-harvesting or more natural conditions in a timely fashion. It is impossible or it might take even up to 50 years in boreal forests. Also climate change can make it necessary to change to species (incl tree), which have not been there pre-harvesting and which might not be natural in historic perspective but suitable for the future.

Criterion 10.3: this criterion text seems to exclude, for instance, pinus tree plantations in Brazil which are recognized as accepted by FSC certification even outside the original habitats. Proposal: to include the exception described in Explanatory Note #6 in the P&C, to avoid field misinterpretation.

Criterion 10.4: the use of genetically modified organisms (GMO) should not be prohibited since the issue is not yet settled within FSC, but should be amended at a later stage.

Criterion 10.6, 10.7, 10.8: use of fertilizers (10.6), pesticides (10.7) and biological agents (10.8) are all more restrained and this will cause further limitations to the productivity of forest.

No estoy de acuerdo de mencionar la frase "o más cercanas a las naturales", ya que es algo imposible en una plantación forestal, pienso que es muy difícil que una plantación de especie exótica vuelva a recuperar condiciones naturales originarias. Por esa razón pienso que es algo exagerado pretender eso o ponerlo como una alternativa a nivel de criterio en el FSC

10.1: restoration to more natural conditions is now made optional, whereas in existing P&C it is a requirement.

10.1: While otherwise mostly OK, this criterion is an unacceptable substitute for the relevant elements of existing C6.3 that require silvicultural practices that maintain and restore natural tree and plant species biodiversity and composition, etc. Instead, this criterion would allow forests that fail to be characterised by such natural conditions to remain in such a state, whether they currently exist at the plantation end of the natural to unnatural spectrum, or somewhere in the middle. While some of the following notes begin to provide some very limited and inadequate mitigation of this situation, those notes are not an enforceable part of the proposed revised P&C, and thus should not be part of the determination of whether the proposed revised P&C adequately maintain the existing P&C's performance measures.

10.1: This criterion fails to maintain the requirements of existing C10.5 that "proportions" of existing plantations be restored to natural conditions. Instead, this criterion and its notes



would allow the entirety of plantations to remain as plantations—severely weakening the P&C’s performance and the FSC’s credibility.

10.1: Exp Note from prior draft: "The pre-harvest condition provides the baseline for regeneration requirements after harvest.

- For an existing plantation, the species harvested may be the same as the one(s) used to regenerate. However, there may be a solid ecological, social and economic reason for changing the species. The chosen species must be ecologically well adapted to the site and management units (Criterion 10.2) and must not be invasive or their invasive tendencies must be minor and easily controlled or mitigated (Criterion 10.3)." This is not true in all cases, e.g., for portions of existing plantations that should be restored to natural conditions per existing C10.5, for plantations created through conversion post-1994, etc.

Much weaker than the existing 6.3. and 10.5. Please revise to the original intent.

10.1 I am concerned that this loses the previous clear commitment that “proportions” of existing plantations be restored to natural conditions - that clear provision is critical regarding the US South. We do not support it. Also needs clearer commitment to protect natural forests

10.1 fails to require improvement of areas which were degraded prior to harvest and require restoration to conditions that will protect soil, water and other ecological resources.

The phrase "to pre-harvesting or more natural conditions" in 10.1 does not make ecological sense. In many instances, the harvesting activities will result in changes in the cover type, dominant species, and other aspects of stand structure and composition. It is not possible to re-create the pre-harvest conditions and "more natural conditions" is an undefined description. It is not clear what the intent of this Criterion is. If the intent is to require prompt regeneration, then the Criterion could read: "After harvest, and/or in accordance with the management plan, The Organization shall, by natural or artificial regeneration methods, regenerate vegetation cover in a timely fashion." The language of 10.1 could include consideration of stand stocking and structure through the addition of the phrase: "Regeneration shall be accomplished in a manner that provides appropriate stocking and stand structure to meet management objectives". Considerations for ecologically-appropriate species selection are addressed in 10.2 and do not need to be repeated in 10.1

10.1 Definitely requires rewrite. Seems to be trying to include natural or enhanced (artificial?) regeneration in natural forests and regrowth in plantations. Leave out the part about "more natural conditions" as this is extremely ambiguous. I suggest something like: "Following harvest, the Organization shall facilitate natural regeneration of the forest or other vegetation in timely fashion as specified in the management plan."

10.1, a) Habría que asegurarse que para el caso de bosques naturales, esta “regeneración” no conduzca precisamente a la degradación y conversión. La nota explicativa 2 que hace alusión a Range to Natural Variation, debe ser más enfática en señalar que no podrá cambiar el bosque; esto es muy importante para bosques tropicales y en especial aquellos que contienen alta biodiversidad y endemismo. b) Tal vez sea necesario incluir en Glosario este concepto, así también el de regeneración natural y artificial.



Comments on Criterion 10.2

<p>What is meant with the term local geno-types? And why should not very good geno-types from a neighbour country be allowed? The idea behind moving genotypes is to enhance the plant survival rate, the growth and the quality. It cannot be anything controversial with that at all since the species are the same. Does FSC also mean that tree breeding is something that shall be prohibited? This criterion is totally counterproductive and unrealistic.</p>
<p>10.2 Native species and local genotypes unless “clear and convincing justification”. The criterion should not give reference to genotypes at all. The idea behind moving genotypes is to enhance the plant survival rate, the growth and the quality. It can not be anything controversial with that at all as far as the species are the same.</p>
<p>What is "local genotypes" under these conditions? All genetic programs to improve quality and production include genes from different regions. And a broader gene-bank is of great importance in the case of disturbances. Proposal: do not refer to genotypes at all.</p>
<p>Leave detail to national/regional standards processes</p>
<p>The referens to genotypes should be removed. Using good genotypes from example a neighbour country is nothing controversial.</p>
<p>Increased forest production is the clear and convincing justification, otherwise tree-breeding programmes would not be used.</p>
<p>What is meant with the term local geno-types? And why should not very good geno-types from a neighbour country be allowed? The idea behind moving genotypes is to enhance the plant survival rate, the growth and the quality. It can not be anything controversial with that at all as far as the species are the same. Do FSC also mean tree breeding is something that shall be prohibited? This criterion is totally counterproductive and unrealistic.</p>
<p>10.2) The genotype should not be mentioned at criteria level, suggest to remove the last sentence.</p>
<p>Comments: 10.1 and 2: It must be made clear that Climate Change can make it necessary to change to tree species, which have not been there pre-harvesting and which might not be natural in historic perspective but suitable for the future. The version D3-0 reflected this much better because it refers to “ecologically well adapted to the site and the management objectives” and should be used. It must be made clear that for example Eucalyptus can also in the future be used in plantations after harvesting and also for the establishment of new plantations on degraded land, which have been harvested long time ago (before 1994).</p>
<p>10.2 is strongly opposed. In New Zealand, natural forest cover has been maintained largely because of the presence of a significant plantation forest resource, much of which has been established on previously long-deforested land. If it wishes to be regarded as a truly international standard its P&Cs should not 'hardwire' in a particular model of forestry.</p>
<p>There are likely to be cases when it is the fact that a species is not well adapted to the site that results in the desirable properties of the products produced by the forest. For example slow growing timber will often have properties that are more desirable on the market. Disease prone timber can give rise to reaction products that are highly valued.</p>
<p>In C10.2, the words "for regeneration" need to be removed. This is because there needs to be clear and explicit thresholds for the use of alien species, whether for initial planting or regeneration, that plantation managers have to meet in order to gain FSC certification.</p>
<p>Similarly, under C10.3, it is absurd that the criteria for using alien species (for establishment or regeneration) should be simply based on the species propensity to be invasive. This</p>



criterion is in direct conflict with P6. There is a need under this new P10 for much greater clarity on how a forest manager and a plantation manager in particular, is to find a balance between the use of a single alien species (monoculture), mixes of alien species, and maintaining and restoring native biodiversity.

Silvicultural systems and practices are at the heart of forest management. C10.5 has been written so as to effectively allow any sort of silvicultural system including extensive single-aged monocultures and extensive clearcutting. This is completely unacceptable for FSC certification. In combination with C10.2 and C10.3, a forest manager, and more particularly, a plantation manager could justify and use almost any silvicultural system and practices. I believe that there needs to be a mechanism under FSC, whereby extensive monocultures of a single alien species managed under an extensive clearcutting system should not be certifiable unless the forest manager is restoring AND maintaining any existing indigenous biodiversity to at least 20% of each FMU. Similarly, if a mixture of alien species are used or if aggregated clearcuts are under a specified limit (eg. 20 ha), the obligation to restore indigenous biodiversity is reduced. Such a mechanism needs to be included in the new Standards.

Very challenging: Native species and local genotypes unless “clear and convincing justification” (10.2). The criterion should not give reference to genotypes at all. The definition of alien species (natural past or present distribution). Criteria 10.3. Use of pesticides (10.7), fertilizers (10.6) and biological agents (10.8) are all more restrained and this will cause further limitations to the productivity of forests.

Is economic viability a convincing justification ?

Define ecologically well adapted to the site - specific to exotic plantation species

Criteria 10.2 and 10.3 will make it very difficult if not impossible for plantations to be certified in many parts of the world.

parece totalmente inadequada a colocação de espécies nativas ou genótipos locais já que esta frase inviabiliza plantações, na sua grande maioria, exceto no hemisfério norte.

Who decides what is clear and convincing as a justification - in intensive plantation systems feeding specific processing plants there may be very little option.

10.2 New formulation for the last part of the criteria needed. Suggestion: “... unless there is demonstrable and significant net benefit for using others and that these do not lead to overall forest degradation”.

existing 10.8 offers more detailed guidance in use of non-native species and should be retained in full. Also, seems to weaken the requirements of C6.3.

This criterion fails to explicitly maintain the requirements of existing C6.3 maintain a natural diversity of tree and other plant species. This also does not prevent non-natives to be planted in natural forests (i.e. conversion). This is fundamentally unacceptable.

10.2: The provision for using non-local and non-native species is also far too broad and open-ended, and creates an unacceptable loophole in the provisions of existing C6.3. Similarly, the provision potentially drastically weakens existing C10.4's requirement that “native species are preferred over exotic species.” Any organization that wishes to use alien species can easily come up with a “clear and convincing justification,” including the simple fact that doing so may be more lucrative. This provision would thus allow widespread conversion of natural forests to non-native and non-local species, which would be patently unacceptable.



<p>Should be a requirement to use only native species.</p>
<p>Language needs to be added around monitoring the use of exotic species..."Any use of exotic species should be carefully controlled and actively monitored to avoid adverse ecological impacts." would be good to also add language around "preventing or controlling invasive exotic species, to the extent practical."</p>
<p>10.2 - New formulation for the last part of the criteria needed. Suggestion: "... unless there is demonstrable and significant net benefit for using others and that these do not lead to overall forest degradation".</p>
<p>This criterion fails to explicitly maintain the requirements of existing C6.3 maintain a natural diversity of tree and other plant species. Plus it appear explicitly to prevent non-natives to be planted in natural forests (i.e. conversion which we do not support. Yes the very rare case may exist that such practices is necessary but that would be the evidence of really bad non FSC management. We want clear indicator that use of non-natives is the very last resort and not a big exception.</p>
<p>The requirement for justifying use of non native species is too weak."Clear and convincing" may be easily met only by economic factors tied to management objectives.. Clear and convincing does not require that no other reasonable alternatives exist, only that a strong argument be made.</p>
<p>Reordenar la formulación, para enfatizar el hecho de que la primera opción es el uso de especies nativas: "The Organization shall use native species* and local genotypes* for regeneration, unless there is clear and convincing justification for using others. The species need to be ecologically well adapted to the site and to the management objectives. b) nota explicitiva 1 es un poco "extraña"; qué se quiere decir con "Recognizing that this might not always be the case", cual no será el caso?; además al parecer esta nota y la 2 se refieren a plantaciones; si no es así habría que formularlas de mejor manera, y si la respuesta es sí, hay que explicitarlo.</p>



Comments on Criterion 10.3

The definition of alien species is unclear, does this refer to natural past or present distribution?
The definition of alien species (natural past or present distribution).
The definition of alien species is to excluding.
If a suitable tree species is well adapted to the site, natural regeneration of the species is very likely. What is minor invasive tendencies, who decides?
Change wording from alien species to exotic species.
Comment: It must be made clear that widely cultivated species, such as Pinus radiata, which can be invasive to some extent can be continued to be used.
Section 10.3 the section relates to growth increments and fails to recognize disease and insect implications. Monitoring should be annually mandatory. Insect or disease evidence should curtail the use immediately. Justification dissertations should demonstrate full cost accounting.
I think the criterion should include the words 'not already present in the vicinity of the FMU' and it should have a requirement that the organisation takes measures to eliminate alien invasive species from natural formations inside and adjacent to its boundaries by engagement with affected landowners and communities.
Very challenging: The definition of alien species (natural past or present distribution). Criteria 10.3.
Can plant exotics in natural forest now ?
This criterion text seems to exclude, for instance, pine tree plantations in Brazil which are recognized as accepted by FSC certification even outside the original habitats.
Suggestion: Include the exception described in Explanatory note #6 in the P&C, to avoid field misinterpretation.
Define rapidly expanding invasive species outside of their native range - Eucalyptus species in South Africa are outside their native range but may not be expanding rapidly, however Acacia mearnsii is also outside their native range but is invasive species
Criteria 10.2 and 10.3 will make it very difficult if not impossible for plantations to be certified in many parts of the world.
Some systems have been using invasive species for years - this would basically disqualify most timber plantations in Africa - certainly Southern Africa. The criterion must accept the use of invasive species with appropriate controls. Also I question whether trials for invasiveness are feasible and possible - invasiveness is dynamic as are environmental conditions.
Need to refer also to monitoring. Suggestion: "...are effectively monitored, controlled and mitigated".
Invasiveness is only one of the many potential negative impacts that are identified in existing 10.8 and reference to all of them should be retained in the revision.
The use of alien species should be further restricted to very limited circumstances, including very limited geographic portions of the management units. It would not be acceptable to convert substantial portions of natural forest management units to alien species, regardless of whether this officially trips the C6.10 prohibition on conversion.
10.3: The language fails to require that managers actually control the alien species to prevent invasive "tendencies." The fact that such control is possible does not mean it will



automatically be implemented. As such, the language fails to maintain the requirements of existing C6.9 for “use of exotic species...[to] be carefully controlled and actively monitored to avoid adverse ecological impacts.” Such oversights are unacceptable.

10.3: Exp Note from prior draft: "The use of alien species is justified, if they have been used traditionally, that is usually before FSC came into existence in 1994 especially if the supply of wood or environmental services from the Management Unit has demonstrably reduced the degradation of natural forest in the region or country of the Management Unit. This can be demonstrated where there is significant natural forest formally protected and managed by a legally recognised conservation agency for conservation purposes, and where wood supply is primarily from plantations." The logic of this note needs to be taken one crucial step further. Otherwise, this note could create widespread unacceptable loopholes. There needs to be an actual causal connection between the plantations and the protected areas. The establishment of plantations does not automatically lead to the establishment of protected areas. Indeed, the exact opposite can also occur, e.g., when natural forests are converted to plantations, preventing the natural forests from being designated as protected areas. Or in other situations, the protected areas' designation may have simply preceded the establishment of the plantation areas. The US would be an example of a region where widespread plantations have done nothing to further the establishment of protected areas, most of which were pre-existing, but in fact have had widespread impacts to remaining unprotected natural forests.

Should be no use of alien species.

10.3 should have greater limitations, what would prevent significant acreages of aliens species replacing native forests?

Need to refer also to monitoring. Suggestion: "...are effectively monitored, controlled and mitigated".

This language is entirely too weak and does nothing to prohibit the gradual conversion of native forests to ones populated by alien species. Nor does this language require that the Organization actually take action to control alien species. It only requires that control is shown to be possible. Also for sentence structure the word "if" should be replaced with "that".

It should be recognized within the guidance for 10.3 that some ecologists are advocating for human introductions of species outside of their historic and present ranges as adaptive management to prepare for and mitigate the impacts of climate change.

10.3 is not practical for plantation forestry. How does one conduct trials to show that a species is not invasive? The literature is full of examples of plants that only became invasive after decades of being introduced into a new country or habitat. One would have to rely on experience and this would imply that no new species can be used - only ones that have already been shown to have the requisite levels of invasiveness. Most plantation industries are based on species that are known to be highly invasive and therefore could not be certified. It is however critical that Organizations have programme in place to limit the spread of invasive species from their plantations.

Criteroio 10.3: El párrafo "...o que las tendencias invasoras son menores y están controladas o mitigadas de forma efectiva" involucra un riesgo al permitir el uso de especies invasoras que se crean poco invasoras, pero que en la realidad podrían ser invasoras y escapan del control.

10.3 If proven invasive a species should NOT be used.



Comments on Glossary definitions related to Criterion 10.3

Alien Species

Past distribution indicates that ecosystem are static, delete!



Comments on Criterion 10.4

As far as I have noticed there is a motion for the GA on this topic. The P&C shall not regulate this before the internal decision process is conducted.
The use of genetically modified organisms (GMO) should not be prohibited since the issue is not yet settled within FSC but should be amended at a later stage.
The use of genetically modified organisms (GMO) should not be prohibited since the issue is not yet settled within FSC but should be amended at a later stage.
Unacceptable. Research, and small scale management must be possible.
As far as I have noticed there is a motion for the GA on this topic. The P&C shall not regulate this before the internal decision process is conducted..
10.4) The use of GMO is under investigation, thus decision can not yet be taken.
10.4 while understand the politics of this (and will not object) FSC should be more accomodating to the potential of GMO and re-word to allow limited and controleld field testing.
10.4 Unacceptable: The use of genetically modified organisms (GMO) should not be prohibited since the issue is not yet settled within FSC (10.4) but should be amended at a later stage. Comment: FSC should be open for discussion about biotech organisms including trees. Biotech trees might be needed to have suitable trees which can survive in changed environmental conditions and provide the necessary raw material on limited available land.
Can not agree on so strict criterion. GMO's could be acceptable for example for protection of forests from pests. FSC should be open for discussion about biotech organisms including trees. Biotech trees might be needed to have suitable trees which can survive in changed environmental conditions and provide the necessary raw material on limited available land.
The use of genetically modified organisms should not be prohibited since the issue is not yet sufficiently treated within FSC but should be amended at a later stage.
Is this a wise stand to take - a GMO may one day have huge environmental benefits.
prefer existing language under 6.8.
Organization and all others active on the certified land base
10.4 - Genetically modified organisms should be prohibited in the management unit.
To be consistent with 10.6, 10.7, and 10.8 the language of 10.4 should read: "The Organization shall minimize, monitor and strictly control the use of genetically modified organisms in accordance with internationally accepted scientific protocols. The Organization shall not use any genetically modified organisms or practices prohibited by FSC policy or applicable laws. When genetically modified organisms are used, The Organization shall prevent, mitigate, and / or remedy damage to Environmental Values."
This is a can of worms for plantations. (I should probably read your definition of genetically-modified organisms).
Not in favour of outright ban on GMO's, becaseu in some cases they can be shown to have environmental benefits. For example, to reduce the use of chemical pesticides.



Comments on Criterion 10.6

10.6: Fertilizer is too vague. We are considering working w/ natural fertilizers (mulches, biochar) etc. and these would be prohibited.
On weak soils there is often a need for fertilizers. That's a fact in Nordic countries as well as on the southern hemisphere. At least in Sweden the use of fertilizers is regulated by legislation and there must be permissions. There is a big need for raw material from forest land and we think it is obvious the possibilities for better growths shall be utilized. The criterion is not acceptable as written in this draft.
Use of pesticides (10.7), fertilizers (10.6) and biological agents (10.8) are all more restrained and this will cause further limitations to the productivity of forests.
The use of fertilizers, pesticides and biological agents is often needed not to limit the productivity of the forest, it should be some recognition for these aspects in the criteria.
Fertilization shall not be avoided but used with great care, preventing damage on environmental values. We believe this criterion is not acceptable as now written.
10.6 Unacceptable. Fertilization is positive for production, and consequently sequestration of carbon, and of great value to the forest owner. In many places fertilization is absolutely necessary for growing forests - the alternative is agriculture with fertilizers. Fertilization as such cannot be prohibited – it is eventual negative effects that should be avoided.
On weak soils there is often a need for fertilizers. That's a fact in Nordic countries as well as on the southern hemisphere. At least in Sweden the use of fertilizers is regulated by legislation and there must be permissions. There is a big need for raw material from forest land and we think it is obvious the possibilities for better growths shall be utilized. The criterion is not acceptable as written in this draft.
10.6, 10.8 are more restrained, thus further limits productivity.
Comment: Fertilization is needed to secure high productivity in plantations. Esp. where the soils are degraded from previous land use.
Sections 10.6,7,8 are appeasement issues not supported by science. Section 10.10 habitat should be created if something is missing.
Need to be explicit about what is meant by the term fertilizer, for instance does this include the use of organic fertilizers?
The explanatory notes are concerned with potential impacts of fertilizer - would prefer that the Criterion dealt with avoiding these rather than minimizing fertilizer.
Very challenging: Use of pesticides (10.7), fertilizers (10.6) and biological agents (10.8) are all more restrained and this will cause further limitations to the productivity of forests.
Draft 4-0 criteria 10.6 and 10.7 indicate that the certificate holder "avoid or aim at eliminating" the use of fertilizers and chemical pesticides. The definition of plantation has also been changed from the previous standard. These prohibitions and definitions show biases to certain types of forest management without considering their consequences in the forest. If as stated in Draft 4-0 (page 7, bullet #6) "...FSC Principles and Criteria are performance based...", then the FSC standard should indicate what results we want in the forest not what we do in the forest; this version should undergo a careful review to ensure consistency with this statement. If we can get the desired result, in terms of ecosystem sustainability, with the use of fertilizer or chemical pesticides or planting trees in rows, then why should these practices be prohibited just because someone does not like them? Of course there are economic consequences as well when these prohibitions are imposed by the standard. The economic consequences are not limited to certificate holders but, unfortunately, readily spread to those local communities that rely on these forests for their



livelihood and well being.
To improve barren lands, bald hills and degraded soil..in tropical countries, the people use fertilizers when they plant trees but here we introduce organic or microbiological fertilizer.
Can not agree on "eliminating" especially on poor and/or degraded soils and for intensively managed forests. Could agree on "minimizing".
Avoid or eliminate fertiliser use is basically impossible for certain areas and species seria bastante evitar o uso de fertilizantes ou minimizar ou utilizar minimizando o impacto negativo.
In some systems the use fertilizers may be entirely appropriate and best practise for the long term sustainability of a plantation.
10.6 or aim at eliminating is too weak
10.6 What is wrong with organic fertilizers? Decomposing organic biomass and similar are likely to improve soil condition under plantations. I suggest to exchange the term "chemical inputs" for "fertilizers."



Comments on Criterion 10.7

<p>We shall have in our minds that the National Initiatives shall have an important role in interpreting this criterion. We suggest this shall be mentioned, here or some elsewhere in the document..</p>
<p>Use of pesticides (10.7), fertilizers (10.6) and biological agents (10.8) are all more restrained and this will cause further limitations to the productivity of forests.</p>
<p>It is not clear whether the criteria imply herbicides are to be eliminated; if it is, this would be a problem in some areas of BC. If herbicides are used under an IPM approach (where cost benefit of various treatments evaluated), this may not be a problem.</p>
<p>The use of fertilizers, pesticides and biological agents is often needed not to limit the productivity of the forest, it should be some recognition for this aspects in the criteria.</p>
<p>The wording “aim at eliminating” the use of pesticides when there is no economical alternative is extremely problematic. Under this criterion Forest Companies must eliminate the use of a safe, effective tool such as glyphosate that is only applied once or twice on planted stands in a 50 year rotation. This tool is highly effective in responsible North American forest management today. Eliminating its use will greatly jeopardize the economical and social benefits of a FSC certified company. If companies can not be cost competitive they will close mills and communities will be greatly impacted. Requiring the elimination of the use of Glyphosate is the number one reason why no large forestry company in New Brunswick, Canada is FSC certified. This one requirement has been a show stopper under the FSC Maritime standard.</p>
<p>I feel that “avoiding or reducing pesticide use” is a credible requirement for FSC to balance the requirements of Social, Economic, and Environmental.</p>
<p>We shall have in our minds the National Initiatives shall have an important role in interpreting this criterion. We suggest this shall be mentioned, here or some elsewhere in the document</p>
<p>10.7 is irresponsible from a sustainable perspective, especially in tropic regions with highly withered soils. Removal of organic matter without compensative fertilizing may lead to soil degradation.</p>
<p>Sections 10.6,7,8 are appeasement issues not supported by science. Section 10.10 habitat should be created if something is missing.</p>
<p>The criterion should absolutely prevent damage tio human health. Where FSC prohibited chemicals are used in the nursery messures should be taken to prevent their transfer to the forest in nursery growing mediums as fr as possible. For example it should not be permitted for the nursery to apply a prohibited pesticide the day before seedlings are sent for planting.</p>
<p>Very challenging: Use of pesticides (10.7), fertilizers (10.6) and biological agents (10.8) are all more restrained and this will cause further limitations to the productivity of forests.</p>
<p>Draft 4-0 criteria 10.6 and 10.7 indicate that the certificate holder “avoid or aim at eliminating” the use of fertilizers and chemical pesticides. The definition of plantation has also been changed from the previous standard. These prohibitions and definitions show biases to certain types of forest management without considering their consequences in the forest. If as stated in Draft 4-0 (page 7, bullet #6) “...FSC Principles and Criteria are performance based...”, then the FSC standard should indicate what results we want in the forest not what we do in the forest; this version should undergo a careful review to ensure consistency with this statement. If we can get the desired result, in terms of ecosystem sustainability, with the use of fertilizer or chemical pesticides or planting trees in rows, then</p>



<p>why should these practices be prohibited just because someone does not like them? Of course there are economic consequences as well when these prohibitions are imposed by the standard. The economic consequences are not limited to certificate holders but, unfortunately, readily spread to those local communities that rely on these forests for their livelihood and well being.</p>
<p>The elimination of herbicides has been a huge source of frustration for (...) under the FSC Maritimes standard. We can not get certified today under this standard yet our lands are currently certified in Maine, USA under the FSC North East US standard. These are bordering regions. This does not make sense, the forest and our practices are identical in both. Our competitors in other regions are using vast amounts of herbicides and are FSC certified, does not seem right. It is not reasonable to ask for elimination when no economical alternative exists.</p>
<p>En los campamentos forestales donde se alojan los trabajadores existen insectos y roedores (endémicos) que transmiten enfermedades que incluso pueden causar la muerte, por ejemplo dengue, leishmaniasis, hantavirus y fiebre amarilla, entre otras. El combate de los mismos forma parte de Campañas Públicas y de una prioridad para la salud pública dentro y fuera de la operación. Por este motivo la fumigación de dichos campamentos es indispensable. Se trata de aplicaciones puntuales en los campamentos (no en campo) y de productos oficialmente reconocidos y recomendados. Entendemos que es una situación similar a la incluida en las Notas Explicativas en relación a los Viveros pero en relación al cuidado de la SALUD de los TRABAJADORES.</p>
<p>Just to clarify the text I suggest to insert "...When pesticides are used by a approved derogation, the Organization shall prevente...".</p>
<p>Criteria should indicate that use of chemical pesticides should be minimised but in some instances it may be the most ecologically least damaging - semantics of wording.</p>
<p>existing language under C6.6 is much clearer and more precise and provides stronger safeguards framework,</p>
<p>Exp Note from prior draft: "Provided that The Organization operates an effective and secure integrated pest management system, tree nurseries included in the management unit as defined may be exempt from the requirements of Criterion 10.7 on chemical pesticides." Tree nurseries should be carefully and narrowly defined to prevent organizations from simply classifying large plantation areas as "nurseries."</p>
<p>10.7 - Weakens pesticides requirement</p>
<p>10.7. weakens pesticide requirements and restrictions</p>
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<p>10.7: Weakened language on pesticides. What is lost is the requirement to 'strive' for to not use chemical pesticides, and the emphasis on the categories of pesticides.</p>
<p>And overall some aspects of the exist P10 on plantations have not been incorporated fully into the P&C as a whole</p>
<p>No estoy de acuerdo en que se permita el uso de químicos que se encuentran en la lista del FSC en los viveros a los que se refiere nota explicativa 7.</p>