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FSC PROCEDURE

THE DEVELOPMENT AND APPROVAL OF FSC POLICIES FSC-PRO-01-002 (Version 1-0)

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FSC-PRO-01-002 (Version 1-0)

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(41st meeting of FSC Board of Directors)

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The Forest Stewardship Council (FSC) is an independent, not for profit, non-government organisation based in Bonn, Germany.

The mission of the Forest Stewardship Council is to support environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC develops, supports and promotes international, national and provincial standards in line with its mission; evaluates, accredits and monitors certification bodies which verify the use of FSC standards; provides training and information; and promotes the use of products that carry the FSC logo.

Summary

This document specifies the requirements and procedures to be followed by FSC for the development and approval of FSC international policies.

The objective of these procedures is to ensure the credibility of all FSC international policies by incorporating the values of transparency, participation and fairness into the processes for their development, whilst ensuring that the FSC Board of Directors can implement its responsibilities effectively and in accordance with the intent of the FSC Statutes and By-laws.

Notes on use of this procedure

All aspects of this procedure are considered to be normative, including the scope, procedure effective date, references, terms and definitions, tables and annexes, unless otherwise stated.

Notes on development of this procedure

Version 1-0 was submitted for approval to the FSC Board of Directors at their 41st meeting in March 2006. It was approved by the Board with a recommendation to solicit further stakeholder input until the end of 2006.

Please send comments and suggestions to the Policy and Standards unit by December 31, 2006:

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The development and approval of FSC international policies

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A Scope

This document specifies the procedures to be followed by the FSC for the development and approval of FSC international policies.

NOTE: the FSC Board of Directors may propose and approve formal FSC policies which have not followed these procedures in order to address acute or urgent issues for which such an approach is considered necessary and in the interests of FSC. The following procedures apply when the FSC develops policies for and on behalf of the FSC Board of Directors.

B Procedure effective date

The specified procedures will become formal requirements with effect from 1st April 2006, pending approval by the FSC Board of Directors.

C References

D Terms and definitions

FSC international policy: a documented course of action or guiding principle formally adopted by the FSC Board of Directors.

NOTE: FSC international policies are usually short statements formally approved by the FSC Board of Directors at its regular meetings. Such policies will generally require a further, specified process in order to be implemented – for example, through the development or modification of specific FSC standards, procedures, guidance or through other actions. Terms and definitions are provided in *FSC-STD-01-002 FSC glossary of terms*.

1. Objective

1.1 The objective of every FSC international policy shall be to further the mission of FSC in line with the aims and aspirations of its members, and taking equal account of the concerns and interests of the three FSC chambers, and its 'northern' and 'southern' membership.

2. Decision to develop an FSC international policy

2.1 Proposals to develop new FSC international policies may originate from discussion by the FSC Board of Directors, the FSC General Assembly, or from proposals by FSC members or members of FSC staff. Proposals may be made as the result of FSC discussion papers, or be included in the FSC annual workplan.

NOTE: 'FSC staff' is understood to include the staff of FSC National and Regional Offices and accredited FSC National Initiatives.

2.2 The formal decision to authorise development of a new FSC international policy shall be taken by the FSC Executive Director, taking account of the approved strategic planning documentation, workplans and other instructions of the FSC Board of Directors.

2.3 The proposal and formal decision to develop a new FSC international policy shall be recorded and filed.

3. Appointment of individual responsible for drafting the policy

3.1 The authorized supervisor of the FSC Policy and Standards program as advised by the FSC Executive Director shall appoint an individual to develop the policy.

3.2 The appointed individual shall be responsible for the drafting process, consultation, and finalisation of the proposed policy.

NOTE: The appointed individual will usually be an FSC Policy Manager, but may be another properly qualified individual, for example a staff member of an FSC National or Regional Office, an FSC National Initiative or a consultant on contract to the FSC. In this document the individual responsible is referred to as the 'Policy Manager'.

4. Drafting and circulation of an FSC Discussion Paper

- 4.1 The Policy Manager shall draft and circulate an FSC Discussion Paper which introduces the issue that has led to the need for an FSC international policy, outlines the potential costs and benefits of policy development, identifies possible options for policy development, and which outlines the process to be followed to develop specific policy proposals.

NOTE: If a discussion paper has been prepared and circulated previously, this requirement may be waived.

- 4.2 The period to submit comments on the discussion paper shall be at least 30 days from its publication.

NOTE: Where the discussion paper is translated, the period to submit comments shall be at least 30 days from the publication of the translated version.

- 4.3 The FSC Discussion Paper shall be publicly announced, e.g. through publication in *FSC News and Notes* and on the FSC website, circulated to the appropriate FSC email forums (e.g. NI forum, CB forum), together with a comment form for free download and distribution.

5. Official announcement of a new policy under development

- 5.1 Subject to completion of the requirements specified in sections 2, 3 and 4, above, and in unison with the publication of the FSC Discussion Paper, the decision to develop a new FSC international policy shall be officially announced, e.g. through publication in *FSC News and Notes* and on the FSC website, and circulated to:

- a) the FSC Board of Directors;
- b) all FSC National Initiatives and National and Regional Offices;
- c) all FSC-accredited certification bodies;
- d) all supervisors of FSC core programs, and
- e) all members of the applicable Consultative Forum.

- 5.2 The announcement should include:

- a) a brief, clear description of the objectives of the proposed policy;
- b) references to previous decisions of the FSC Board of Directors, FSC General Assembly, FSC Discussion Papers, Standards etc., which are considered relevant to the proposed policy;
- c) the contact point at the FSC for further information;
- d) the estimated timeline for development of the proposed policy, and
- e) an invitation to take part in the development of the policy through registration on the applicable Consultative Forum.

6. Consultative Forum

- 6.1 The Policy Manager shall be responsible for setting up a Consultative Forum for the development of the FSC international policy.

- 6.2 The role of the Consultative Forum is to ensure that all stakeholders who may be affected by the implementation of a specific FSC international policy have the opportunity to comment, formally, during the process of development of the policy.
- 6.3 Membership of a Consultative Forum shall be open to any stakeholder on request, whether or not the stakeholder is an FSC member. The number of participants shall not be limited.
- 6.4 The Policy Manager shall ensure that the Consultative Forum includes individuals and/or organisations reflecting the full range of stakeholders affected by the policy under development.
- 6.5 The Policy Manager shall:
- a) invite the participation of all FSC members, through an invitation in FSC News and Notes;
 - b) request that members of the FSC Board of Directors, FSC National Initiatives, FSC National and Regional Offices and FSC-accredited certification bodies suggest individuals and organisations that should be invited to take part on the Consultative Forum.
- 6.6 Members of the FSC Consultative Forum shall complete a simple questionnaire which identifies the stakeholder group(s) to which they belong, and which identifies whether they are an FSC member (See example stakeholder questionnaire, Annex 1).

7. Preparatory policy drafting and consultation

- 7.1 The Policy Manager shall draft and circulate a draft policy proposal on the published FSC Discussion Paper.
- 7.2 Draft policy proposals shall be based on the template for draft FSC international policies, which specifies the policy's proposed title, draft number, date, status, time-limit for comments, FSC registration code, Policy Manager's contact details, etc.
- 7.3 Drafts may be specified as being for public consultation, or for technical consultation. Drafts shall be numbered as "(Draft #-#)" where the first number is the number of the applicable draft for public consultation, and the second number is the applicable revision number of the drafts for technical consultation.

For example, Draft 1-0 would be the first draft released for public consultation. Draft 1-1 would be a revision of this draft, for technical consultation only. Draft 2-0 would be the next draft for public consultation. If initial drafts are circulated for technical consultation only they would be numbered Draft 0-0, 0-1, etc.

- 7.4 Drafts for public consultation shall be publicly announced, e.g. through publication in *FSC News and Notes* and on the FSC website, together with a summary of the key points and a comment form for free download and distribution, and shall be circulated to:
- a) the FSC Board of Directors
 - b) all FSC National Initiatives and National and Regional Offices;
 - c) all FSC-accredited certification bodies;
 - d) all supervisors of FSC core programs, and

- e) all members of the applicable Consultative Forum.
- 7.5 Each consecutive draft for public consultation shall include the changes (additions, deletions) made since the previous public draft and/or a summary of the key points of change between drafts.
- 7.6 The period to submit comments on drafts for public consultation shall be at least 30 days from publication.
- 7.7 For consideration as formal comments, comments shall be submitted:
- a) in English language,
 - b) to the email address on the header of the draft policy,
 - c) prior to the closing of the period for submitting comments, stated on the header of the draft policy, and
 - d) with required information about the commenter (see example stakeholder questionnaire, Annex 1).
- 7.8 All other comments shall be considered as informal comments. Informal comments will be responded to in so far as the capacity of the FSC allows.
- 7.9 All comments should be attributed, and will be considered as being publicly available, unless the contributor explicitly requests that the comments should be treated as being confidential. Anonymous comments shall not be considered.
- 7.10 All formal comments should be acknowledged on receipt and collated by the Policy Manager.
- 7.11 The Policy Manager shall prepare a report on the formal comments which includes:
- a) a summary of the issues raised,
 - b) an analysis of the range of stakeholder groups who have submitted comments,
 - c) a general response to the comments, and
 - d) an indication of how the comments have been taken into account in the subsequent public draft policy.
- 7.12 The subsequent public draft of the policy shall be publicly announced, e.g. through publication in *FSC News and Notes* and on the FSC website, together with the report on the formal comments received since the previous public draft and circulated to:
- a) the FSC Board of Directors
 - b) all FSC National Initiatives and National and Regional Offices;
 - c) all FSC-accredited certification bodies;
 - d) all supervisors of FSC core programs, and
 - e) all members of the applicable Consultative Forum.
- 7.13 The Policy Manager shall analyse the sources of the comments to ensure that comments have been received from representatives of all the key stakeholder groups identified as being impacted by the implementation of the proposed policy.

- 7.14 The Policy Manager shall be proactive in seeking input from representatives of stakeholder groups that have not yet commented. The Policy Manager shall make special provisions to ensure that formal comments are received from representatives of any marginalised groups that may be affected by the policy, and/or ensure that specific provisions have been made to ensure that the potential impacts of the policy on such groups have been explicitly identified and taken into account.
- 7.15 The Policy Manager shall aim to ensure that the proposed policy:
- a) meets the objectives specified in paragraph 1.1 above; and
 - b) is consistent with previously approved FSC international policies, standards, guidance and advice.

NOTE: The Policy Manager may propose new policies that imply modifications to previously approved FSC international policies, standards, guidance and advice where such a proposal appears to have the support of the FSC membership (see 9.2, below).

- 7.16 The number of drafts circulated for public consultation prior to finalisation of the policy shall be at the discretion of the authorized supervisor of the FSC Policy and Standards program and the Policy Manager, taking account of the comments received.

8. Language

- 8.1 All drafts of each standard for public consultation shall be made available in English.
- 8.2 The meaning of English words should follow those given in the Shorter Oxford English Dictionary or the Concise Oxford Dictionary, unless the intended meaning is specified in the policy or provided in *FSC-STD-01-002 FSC glossary of terms*.
- 8.3 The following words will be used in accordance with the specific meanings given below:
- a) the word 'shall' to indicate a requirement of the policy, and the words 'shall not' to indicate a prohibition;
 - b) the words 'should' or 'should not' to indicate a recommendation, rather than a requirement or prohibition, of the policy;
 - c) the word 'may' to indicate a permitted course of action, within the limits of the policy;
 - d) the words 'need not' to indicate that a specified course of action is not a requirement.
- 8.4 The reference version of all policies shall be the English version. All versions in other languages shall include a disclaimer explaining that in case of doubt the English language version of the policy shall take precedence.

9. Content

- 9.1 The final draft policy shall be accompanied by an indication of the further steps that may be required in order to enable implementation and clear specification of the expected timelines for implementation. Policies may require the development of specific international, regional or national standards, or further policies or procedures before implementation is possible.

9.2 The Policy Manager shall identify any inconsistencies noted between the proposed policy and other previously approved FSC international policies, standards, guidance and advice, and shall include an explicit proposal to modify the previously approved documents at the same time as the new policy proposal is itself approved.

10. Draft policy submitted for decision making

10.1 When the Policy Manager considers that a draft policy is ready for submission to the FSC Board of Directors, the Policy Manager shall prepare a report for submission to the FSC Executive Director. The report shall:

- a) summarise the policy development process;
- b) summarise the main objectives (e.g. social, environmental, economic) of the policy;
- c) include an evaluation of the potential financial impacts of the policy (e.g. administrative and other transaction costs in relation to certificate holders, certification bodies, FSC National Initiatives, FSC National and Regional Offices and FSC);
- d) explain the main issues and concerns raised during the process, and explain how these have been addressed;
- e) list any modifications to previously approved FSC international policies, standards, guidance or advice required to ensure that the body of FSC requirements remains self-consistent;
- f) include a clear description of any departures from procedures specified in this document, demonstrating compliance with the requirements of section 16 of this document; and
- g) include as Annexes:
 - i) a list of the names and affiliations of the members of the Consultative Forum;
 - ii) the names and affiliations of all stakeholders that have submitted comments during the policy development process (including specification whether the stakeholder is an FSC member, and, if so, of which chamber and sub-chamber); and
 - iii) copies of all formal comments received.

10.2 The report shall be approved by the authorized supervisor of the FSC Policy and Standards program, and the FSC Executive Director. FSC Executive Director shall then submit the report together with the proposed policy to the FSC Board of Directors for decision making, following the applicable requirements for the submission of documents to meetings of the FSC Board of Directors.

10.3 The proposed policy submitted to the FSC Board of Directors for decision-making may include revisions to accommodate formal comments received up until the time the report to the FSC Board of Directors is finalised. All comments that have been taken into account shall be included in the report to the FSC Board of Directors. Comments received after the report and the accompanying policy proposal have been finalised will not be considered by the FSC, for the final version of the policy.

NOTE: This final proposed policy shall include the changes (additions, deletions) made since the previous public draft and/or a summary of the key points of change between drafts.

11. Decision making

- 11.1 All FSC international policies shall be presented to the FSC Board of Directors for approval. The FSC Board of Directors may delegate its powers to a formal committee charged with this duty, subject to oversight by the FSC Board of Directors.
- 11.2 The board (or its designated committee) may:
- a) approve the policy;
 - b) request further work on the policy prior to re-submission; or
 - c) approve the policy with proposed modifications.
- 11.3 If the Board of Directors requests further work on the policy it shall explain the objectives of any further work.
- 11.4 If the Board of Directors approves the policy with proposed modifications, it shall agree a written explanation for the proposed modifications. The proposals and the explanation shall be made available with the final FSC Policy for public consultation following all relevant provisions of sections 7, 8, 9, 10 of this procedure, before it is re-submitted to the FSC Board of Directors for decision-making.

12. Review and revision of approved policies

- 12.1 Typographical errors and minor inconsistencies in an approved policy may be corrected with the approval of the authorized supervisor of the FSC Policy and Standards program.
- 12.2 In the case of minor substantive changes the authorized supervisor of the FSC Policy and Standards program shall draft a written justification for the proposed change, which shall be circulated to the FSC Board of Directors, FSC National Initiatives, FSC National and Regional Offices, and to FSC-accredited certification bodies for a 30-day review period. All comments received shall be circulated by the FSC to all members of the FSC Board of Directors, FSC National Initiatives, FSC National and Regional Offices, and to FSC-accredited certification bodies. If no objection from any member of the FSC Board of Directors is received during the review period the authorized supervisor of the FSC Policy and Standards program may amend the policy in line with the proposal, taking account of any comments received.
- 12.3 In the case of changes resulting from corrections or amendments as described in 12.1 and 12.2 above, the updated policy will be given a new number, V1-1, V1-2, etc., together with the date of the update. The most recent version will be publicly announced, e.g. through publication in *FSC News and Notes* and on the FSC website, and circulated to:
- a) the FSC Board of Directors;
 - b) all FSC National Initiatives and National and Regional Offices;
 - c) all FSC-accredited certification bodies;
 - d) all supervisors of FSC core programs, and
 - e) all members of the applicable Consultative Forum.
- 12.4 The FSC Policy and Standards program shall keep a file of all comments on FSC policies that are submitted after the approval of the policy.
- 12.5 If the FSC Executive Director considers that substantive changes to the policy may be necessary in light of comments received, the authorized supervisor of the FSC

Policy and Standards program shall prepare a report for consideration of the FSC Board of Directors summarising the comments submitted and proposing what steps may be needed to review and revise the policy.

12.6 Major substantive changes to FSC international policies shall be approved by the FSC Board of Directors.

13. Revision of a policy by the FSC General Assembly

13.1 The FSC General Assembly may propose changes to FSC international policies through duly approved motions. Specific changes may then be developed by the FSC and presented to the FSC Board of Directors for decision-making.

14. Complaints and disputes

14.1 Complaints/disputes related to content of the approved policy shall be responded to by the Policy Manager, by providing an explanation of why a particular point of view was not incorporated into the final policy submitted for approval, and/or explaining how the point may be raised again in relation to future revisions of the policy.

14.2 Further appeals or complaints in relation to content will be forwarded to the FSC Board of Directors for its consideration.

14.3 Complaints/disputes related to procedural issues shall be responded to initially by the Policy Manager. If the complainant is not satisfied with the Policy Manager's explanation, the complaint /dispute shall be addressed through the applicable FSC Disputes Resolution process.

15. Availability of approved FSC international policies

15.1 Approved FSC international policies shall be available to stakeholders free of charge in electronic format. FSC may charge at cost for providing and making available (e.g. the cost for posting, printing, postage and packing for orders of hard copies) of its policies.

16. Approved departures from procedures

16.1 Departures from these procedures may be approved in exceptional circumstances, when compliance with the procedure was not possible for reasons beyond the control of the FSC, and/or when an alternative process would be in the best interests of the mission of FSC.

16.2 The Policy Manager shall report any departures in writing to the authorized supervisor of the FSC Policy and Standards program as soon as they are proposed or come to the Policy Manager's notice. The report shall explain the nature of the departure, and the reason or justification for the departure. The authorized supervisor of the FSC Policy and Standards program shall review the report, and shall authorise the departure, and/or specify corrective action to be taken in relation to the departure. The FSC Board of Directors decides on any departure from this procedure.

16.3 The Board of Directors may propose additional actions, at its discretion.

17. Record keeping

17.1 The FSC shall keep the following records for each policy developed:

- a) the formal decision to develop the policy (see paragraph 2.2, above);
- b) names and affiliations of members of the Consultative Forum, and of other stakeholders that were consulted on the policy during its development;

- c) copies of public draft policies circulated for comment;
- d) copies of all formal comments received on public draft policies;
- e) summary of comments received in response to each public draft, together with a general response to those comments;
- f) copies of technical drafts;
- g) the report submitted to the FSC Board of Directors including a description of all departures from the specified procedures for policy development, and the actions taken in respect of those departures (see section 16, above);
- h) the decision of the FSC Board of Directors, including the explanation of the FSC Board of Directors for any modifications made to the final draft policy submitted for approval (see section 11, above).

Annex 1: Example stakeholder questionnaire Questionnaire

To be used to provide information on members of consultative forums and contributors of formal comments on FSC documents

Cover note

Please read this cover note and fill in the questionnaire form carefully. By this, you can become a member of an FSC Consultative Forum and help that any contribution on FSC documents will be considered as a formal comment.

In order to be fully considered, responded to and included in reports, comments on draft FSC policies and standards or FSC discussion papers must be fully attributable to:

- a person; and, where relevant,
- the organization or company on behalf of which the comment is being submitted; and
- the formal status of the person within this organization.

Comments submitted on FSC documents in development or under review will be considered as being publicly available (without information about the contributor), unless the contributor explicitly requests that the comments should be treated as being confidential.

How to enter information in the questionnaire form

Information can only be entered into the provided form fields which are shaded grey by default. The fields are extending when you are entering information: You can write beyond each line and you can also press <ENTER> to add further paragraphs within one field. In order to move to the next field press <TAB> or use the cursor keys.

Fields titled in bold must be filled in, where applicable, to provide the required minimum information on formal comments.

Fields suffixed by an asterisk (*) are considered as being publicly available.

If you have provided this information before and the information is still valid, a reference to the previously submitted questionnaire/comment is sufficient (see bottom of form).

QUESTIONNAIRE FORM

Person: Full name	
First name*:	
Last name*:	
Title:	
On behalf of (organisation, company, government agency, etc.) – if applicable	
Organisation*: <i>Please enter the legal or registered name of your organisation or company.</i>	
Department:	
Position*: <i>Please indicate the position or function you exert within your organisation or company.</i>	
Description: <i>Please provide a short description of your organisation, highlighting any special features in comparison to other organisations of the same sector.</i>	
Mailing address	Phone, fax, email & internet
	Tel: +
	Mob: +
	Fax: +
	email:
	www:
Country:	
FSC relationship	Type of contributor
<input type="checkbox"/> FSC Member <input type="checkbox"/> Member of FSC National Initiative FSC Sub-Chamber:	<input type="checkbox"/> Organisation <input type="checkbox"/> Private company or corporation <input type="checkbox"/> Industry association <input type="checkbox"/> Non-profit organisation <input type="checkbox"/> Trade association <input type="checkbox"/> Government or local authority Other:
<input type="checkbox"/> FSC Certificate Holder <input type="checkbox"/> Group member Code number:	<input type="checkbox"/> Individual Background:
<input type="checkbox"/> FSC-accredited certification body <input type="checkbox"/> Affiliate or sub-contractor	
How submitted information should be handled	
<input type="checkbox"/> I would like to become a member of the corresponding Consultative Forum which is regularly consulted with on subsequent public drafts of this document.	
<input type="checkbox"/> Please treat my comments as confidential.	
Full information previously submitted: <input type="checkbox"/>	
FSC document:	Date:
<i>Code, version and/or title of commented FSC document</i>	<i>of questionnaire sent</i>

Annex 2: The role of FSC National Initiatives in consultation on draft FSC international policies

The FSC welcomes and encourages involvement of FSC National Initiatives at all stages of development of international policies.

The FSC recognises that the capacity of individual FSC National Initiatives to take an active part in the development of FSC international policies varies greatly. Some FSC National Initiatives may wish to take an active role in the development of many policies; other FSC National Initiatives may have the capacity to play an active part only in the development of policies of special interest to their country or region.

FSC welcomes discussion with FSC National Initiatives that are interested in developing joint project proposals or funding proposals related to development of international policies.

The following notes are designed to provide FSC National Initiatives with guidance as to the range of options for participation which are currently available. It is recognised that these options are based on the current FSC structure. If FSC changes its organizational model, then procedures would need to be reviewed and would likely need to be revised.

Comments on draft policies

FSC National Initiatives' staff is selected for their knowledge of the forest sector in their country, and their understanding of, and respect by, a wide variety of stakeholders. FSC National Initiatives' staff is encouraged to comment on all draft policies, and to provide such comments to the Policy Manager.

Face to face meetings with the FSC Policy and Standards Unit

FSC National Initiatives' staff is encouraged to contact the Policy Manager at any time to discuss policies under development, or to clarify issues that are not clear.

The FSC Policy and Standards program aims to meet FSC National Initiatives' staff at regional meetings at least once a year, and to provide time at these meetings to discuss any ongoing policy development processes.

Appointment as Policy Managers

FSC National Initiatives' staff may be appointed as Policy Managers by the authorized supervisor of the FSC Policy and Standards program.

Circulation of draft policies to national stakeholders

FSC National Initiatives are encouraged to keep local stakeholders informed of FSC international policies under development, for example by including notes on development in national newsletters, on national websites, etc. FSC National Initiatives may circulate draft FSC policies to local stakeholders and seek feedback to pass on to the FSC, or encourage national stakeholders to provide their feedback directly to FSC.

Translation of draft policies

The FSC usually develops draft policies in English. National Initiatives are encouraged to translate draft policies into one or more local languages in order to improve review and stakeholder consultation in their country or region. If translations are developed by FSC

National Initiatives they should always include a disclaimer to the effect that the original document takes precedence over the translation, in case of doubt.

National stakeholder meetings and tele-conferences

FSC National Initiatives are encouraged to organise meetings or tele-conferences of national stakeholders to discuss FSC international policies that are under development, and are encouraged to invite FSC international staff to these meetings to present the latest draft policies and enter into question and answer sessions with stakeholders.

Summarising national viewpoints

FSC National Initiatives may summarise the viewpoints of national stakeholders, and submit such summaries to the Policy Manager. In this case the FSC National Initiative should ensure that the names and affiliations of the individuals or organizations whose viewpoints are summarised are listed, and make clear whether the viewpoints being presented are a consensus agreement of those individuals and organisations, or include a variety of disparate views. The FSC National Initiative should also clarify whether the individuals/organisations are speaking in their own, individual capacity, or whether they are speaking as the formal representatives of a stakeholder group or category.

In all such cases the FSC National Initiatives shall be clear that the views are those of the national stakeholders, and do not represent the views of the FSC National Initiatives' staff.

The FSC National Initiative is also encouraged to provide additional intelligence in relation to whether views expressed by national representatives are widely held, and/or in relation to the likely impacts of FSC policies on national stakeholders.

As representatives of FSC, FSC National Initiatives' staff should not take public positions in relation to FSC policies under development, and should not be considered to be representatives of national stakeholders. The role of FSC National Initiatives is to ensure that the views of national stakeholders are properly included in the policy development process, not to be the representative of those views.

Annex 3: Special considerations for inclusion of stakeholders from the economic south

The procedures have been specified to try to ensure fair participation of all key stakeholders from whatever part of the world. However, some specific considerations are appropriate to try to ensure participation of stakeholders from the economic south.

These include:

- Seeking opportunities to meet with southern stakeholders in association with other meetings;
- Aiming to include southern, and in particular regional representation in Consultative Fora
- Working with FSC National Initiatives in southern countries to hold telephone conferences with southern stakeholders
- Seeking funding to facilitate consultation by southern FSC National Initiatives