



Interpretation

INTERPRETATIONS OF THE NORMATIVE FRAMEWORK

Country Requirements

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Title: Interpretations of the Normative Framework

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CONTENTS

Terms and Definitions	4
Verbal forms for the expression of provisions:	4
Abbreviations.....	5
Africa	6
FSC-STD-NAM-01-2019	6
FSC-STD-RWA-01-2017	8
FSC-STD-UGA-01-2017	9
FSC-STD-ZAF-01-2017	11
Asia Pacific	12
FSC-STD-AUS-01-2018	12
FSC-STD-VN-01-2018	14
Europe	15
FSC-STD-DEU-03-2017	15
FSC-STD-DNK-02-2018	18
FSC-STD-GBR-03-2017	19
FSC-STD-LUX-02-2019	20
FSC-STD-LVA-01-2023	21
FSC-STD-POL-01-2-2013	24
FSC-STD-PRT-01-2016	25
FSC-STD-SWE-03-2019	26
FSC-STD-UKR-01.1-2024	28
Latin America	30
North America	31
FSC-STD-CAN-01-2018	31
CIS	37

TERMS AND DEFINITIONS

Verbal forms for the expression of provisions:

[Adapted from *ISO/IEC Directives Part 2: Rules for the structure and drafting of International Standards*]

- “shall”: indicates requirements strictly to be followed in order to conform with the standard.
- “should”: indicates that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others, or that a certain course of action is preferred but not necessarily required. A ‘should requirement’ can be met in an equivalent way provided this can be demonstrated and justified.
- “may”: indicates a course of action permissible within the limits of the document.
- “can”: is used for statements of possibility and capability, whether material, physical or causal.

Abbreviations

CB	Certification body
CH	Certificate holder
FM	Forest Management
FMU	Forest Management Unit
FPIC	Free Prior Informed Consent
FSC	Forest Stewardship Council
FSS	Forest Stewardship Standard
HCV	High Conservation Value
ILO	International Labour Organisation
IFSS	Interim Forest Stewardship Standard
IGI	International Generic Indicators
NF	Normative Framework
NO	National Office
NTFP	Non-timber forest product
PSC	Policy and Standards Committee
PSG	Policy Steering Group
PSU	Performance and Standards Unit (i.e., P&P)
SDG	Standard Development Group
SIR	Scale, intensity and risk
SLIMF	Small or low-intensity managed forest(s)
STD	Standard
TWG	Technical Working Group
QMS	Quality Management System

AFRICA

FSC-STD-NAM-01-2019

Code	INT-FSC-STD-NAM-01-2019_01
Requirement(s)	FSC-STD-NAM-01-2019 V1-0, Indicator 6.7.1
Publication date	25 August 2020
<p>Which measures shall be implemented for protecting natural watercourses, as based on Indicator 6.7.1?</p> <p>A 100 meters conservation zone and/or protection area shall be implemented on either side of the outer edge of major rivers/ephemeral drainage lines and/or pans listed below, in accordance with the Forestry Act Forest Act 12 of 2001 and associated regulations:</p> <p><i>Akazulu, Arasab, Auob, Chapman's, Chobe, Cuvelai, Daneib, Eiseb, Epukiro, Etosha, Fish, Hoanib, Hoarusib, Huab, Hunkab, Kaudom, Kaukausib, Khan, Khumib, Koichab, Koigab, Konkiep, Kuiseb, Kunene, Kwando, Linyandi, Löwen, Messum, Mpungu, Munutum, Nadas, Nhoma, Nipele, Nossob, Oanob, Okavango, Olifants, Omaruru, Omatako, Omuramba, Omuramba, Owambo, Omuthiya, Ondusengo, Orange, Orawab, Otjozondjou, Rietfontein, Sechomib, Skaap, Swakop, Tsauchab, Tsondab, Tumas, Ugab, Uguchab, Uniab, Zambezi.</i></p> <p>Regarding all other rivers/ephemeral drainage lines and/or pans, a 100 meters conservation zone and/or protection area shall be implemented on either side of their outer edge, unless the operation has clear conservation or restoration benefits shown in the environmental impact assessment.</p>	

Code	INT-FSC-STD-01-NAM-01-2019_02
Requirement(s)	FSC-STD-NAM-01-2019 V1-0, Annexure C
Publication date	25 August 2020
<p>What are the personal protective equipment (PPE) requirements for chainsaw operators?</p> <p>Chainsaw operators and assistants shall wear the protective equipment specified in the ILO code of practice "Safety and Health in Forestry work", which includes safety helmets, eye protection, hearing protection, leg protection and footwear.</p> <p>In addition, Clause 8.b in Annexure C requires one first aider per team of workers.</p>	

Code	INT-FSC-STD-01-NAM-01-2019_03
Requirement(s)	FSC-STD-NAM-01-2019 V1-0, Annexure D, Clause 2
Publication date	25 August 2020
<p>Which elements in the Annexure D, Clause 2 are normative requirements, and which are informative guidance for housing conditions?</p> <p>The normative element of Clause 2 is:</p> <ul style="list-style-type: none"> • “Structurally safe, not overcrowded and regularly repaired, with sufficient ventilation.” <p>The informative elements of Clause 2 for guidance are:</p> <ul style="list-style-type: none"> • “Density standards are expressed either in terms of minimal volume per resident or of minimal floor space. Usual standards range from 10 to 12.5 cubic metres (volume) or 4 to 5.5 square metres (sur-face)”. • “A minimum ceiling height of 2.10 metres is provided”. • “In collective rooms, which are minimised, in order to provide workers with some privacy, only a reasonable number of workers are allowed to share the same room (2 - 8 workers)”. 	

FSC-STD-RWA-01-2017

Code	INT-FSC-STD-RWA-01-2017_01
Requirement(s)	FSC-STD-RWA-01-2017 V1-0, Indicator 6.5.1
Publication date	22 May 2024
<p>Shall the term ‘native ecosystems’, which is used in Indicator 6.5.1, be read as ‘native species’ as the Adaptations Record suggests?</p> <p>No. Indicator 6.5.1 referring to ‘native ecosystems’ is the binding normative requirement. The Adaptations Record is only informative, not normative.</p> <p>NOTE: In cases of any inconsistency between an entry in the Adaptations Record and the wording of an indicator, the indicator prevails.</p>	

FSC-STD-UGA-01-2017

Code	INT-FSC-STD-UGA-01-2017_01
Requirement(s)	FSC-STD-UGA-01-2017 V1-0, Clause 7.3, indicators 3.2.1a and 3.2.1b
Publication date	04 July 2023
Background: <p>A stakeholder has made us aware that The Constitutional Court of Uganda on the 19th August 2021, handed down a judgement ordering the Government of Uganda to take responsibility for the lack of compensation to the Batwa people for loss of land following evictions from Bwindi Impenetrable National Park (Bwindi INP) between 1991 and 1996. The matter was referred to the High Court in order to determine appropriate action to ameliorate the effects of the illegal eviction from relevant lands. UWA manages Bwindi Impenetrable National Park on behalf of the Ugandan Government. The ruling is now subject to an appeals process following an appeal lodged by the Government through UWA at the Appeals Court on 1st September 2021 but the Constitutional Court ruling as it stands concludes that the legal rights of the Batwa have been violated. (ref: https://www.forestpeoples.org/en/press-release/2021/batwa-uganda-conservation).</p> <p>The Court ruling specifically relates to Bwindi Impenetrable National Park and we are issuing new findings to UWA based on this court ruling. According to Soil Association, this may have implications for other sites within the UWA certificate, and the CB seeks interpretation of the two indicators to which the SDG of Uganda has provided response below (see response under the proposed interpretation section below).</p> <p>1. Does the guidance under Indicator 3.1.2a of <FSC-STD-UGA-01-2017 V1-0 FSC National Forest Stewardship Standard of the Republic of Uganda> mean that a resettlement program for Indigenous Peoples makes a Management Unit not eligible for certification?</p> <p>No. This indicator and its guidance refer only to documenting or mapping of the following specified issues:</p> <ol style="list-style-type: none">a. Their legal and customary rights of tenure;b. Their legal and customary access to, and use rights of the forest resources and ecosystem services;c. Their legal and customary rights and obligations that apply;d. The evidence supporting these rights and obligations;e. Areas where rights are contested between indigenous peoples, governments and/or others.f. Summary of the means by which the legal and customary rights and contested rights are addressed by The Organization.g. The aspirations and goals of indigenous peoples related to management activities.	

Certification eligibility does not depend on this indicator or guidance alone but on the overall conformity with the applicable standard in its totality.

- 2. If a court has concluded that Indigenous Peoples have illegally been evicted from a Management Unit, should The Organization, qualifying as a Low Impact Organization, therefore apply indicator 3.1.2a of <FSC-STD-UGA-01-2017 V1-0 FSC National Forest Stewardship Standard of the Republic of Uganda> instead of indicator 3.1.2b of <FSC-STD-UGA-01-2017 V1-0 FSC National Forest Stewardship Standard of the Republic of Uganda>?**

No, such a scenario does not change the status of The Organization to qualify as a Low Impact Organization.

Therefore, indicator 3.1.2b for LIO's and SLIMFs applies.

FSC-STD-ZAF-01-2017

Code	INT-FSC-STD-ZAF-01-2017_01
Requirement(s)	FSC-STD-ZAF-01-2017 V1-0, Section 2.1 FSC-STD-01-001 V5-2, Preamble, Section 3 ADV-20-007-01 INT-STD-01-001_16
Publication date	19 September 2022
<p>1. Is it possible to certify area invaded with alien invasive tree species in South Africa?</p> <p>Yes, provided the area meets the definition of “forest” as prescribed in the ‘National Forests Act, 1998 (Act No. 84 of 1998) of South Africa’ (hereafter referred to as ‘National Forests Act’), and the management system is in conformity with the <FSC Principles and Criteria>, demonstrated through the applicable forest stewardship standard.</p> <p>If the area does not meet the definition of “forest” as prescribed in the National Forests Act but is considered as ‘other vegetation type’ as per <FSC-STD-01-001 V5-2 FSC Principles and Criteria>, INT-STD-01-001_16 applies.</p> <p>NOTE: “‘Forest’ includes — (a) a natural forest, a woodland, and a plantation; (b) the forest produces in it; and (c) the ecosystems which it makes up.” (Source: National Forests Act)</p> <p>Natural Forest, Woodland and Plantation are further defined in the National Forests Act.</p> <p>2. Which forest stewardship standard is applicable?</p> <p>If the forest type meets the legal definition of natural forest and/or woodland, as per the National Forests Act, an existing CB adapted standard for South Africa shall be used. If the forest type meets the legal definition of plantation, as per the National Forests Act, the <FSC National Forest Stewardship Standard of the Republic of South Africa> (FSC-STD-ZAF-01-2017 V1-0) shall be used.</p>	

ASIA PACIFIC

FSC-STD-AUS-01-2018

Code	INT- FSC-STD-AUS-01-2018_01
Requirement(s)	FSC-STD-AUS-01-2018 V1-0, Criterion 9.1
Publication date	29 March 2021
<p>Background:</p> <p>Old-growth forest is defined in the FSC-STD-AUS-01-2018 standard as “<i>ecologically mature forest with negligible disturbance</i>”.</p> <p>A forest stand is defined as “<i>An individual portion of the Management Unit managed as a singular unit. This may be in the form of a coupe, harvest block, regeneration area or a designated conservation zone and should be identifiable in Management Plans and mapping.</i>”</p> <p>A Management Unit is defined as “<i>a spatial area or areas submitted for FSC certification with clearly defined boundaries managed to a set of explicit long-term objectives which are expressed in the management plan.</i>” That is, a Management Unit and Forest Management Unit (FMU) are equivalent terms.</p> <p>At issue is the Guidance for Old-Growth Forests text box that is found on page 66 of the Standard. The Guidance contains the following: “<i>It is important to note that the presence of HCV 3.3 old-growth forest in the management unit does not necessarily exclude harvesting. It is the responsibility of The Organization to demonstrate that its status at a landscape level will be maintained and not threatened as a result of management activities.</i>”</p> <p>There are conflicting interpretations of this Guidance language among stakeholders and members of the Australian Standards Development Group.</p> <p>One interpretation is that harvesting of/in old-growth forest is allowed provided that it can be demonstrated by the Forest Management Entity that such harvesting of old-growth trees/stands does not threaten the viability of old-growth as an ecological component, at the landscape level.</p> <p>The opposing interpretation is quite different, that harvesting within the Management Unit is allowed, but the harvesting of individual old growth trees or stands within the Management Unit is not permitted.</p> <p>In this context, is the harvesting of old growth permitted, if the Forest Management Entity can demonstrate that its management activities are not threatening <i>old-growth forest*</i> at a landscape level, and the other HCV requirements in the Standard are met?</p> <p>Management of <i>old-growth forest*</i> is regulated as follows:</p>	

- 1) Identified HCV 3.3 *old-growth forest** shall* be maintained and/or enhanced within the *Management Unit** taking into account the presence and condition of HCV 3.3 *old-growth forest** at a *landscape** level.
- 2) Management activities negatively impacting HCV 3.3 *old-growth forest** are not permitted.
- 3) There are instances where removal of trees in HCV 3.3 *old-growth forest** may occur, limited to management activities which maintain and/or enhance the identified *High Conservation Values**, such as removal of trees that are not characteristic to *old-growth forest** as well as tree removals for safety and access provided this is justified.

NOTE: The guidance regarding identification and assessment of HCV 3.3 *old-growth forest** provided in the guidance box on page 66 of the National Forest Stewardship Standard still applies.

FSC-STD-VN-01-2018

Code	INT-FSC-STD-VN-01-2018_01
Requirement(s)	FSC-STD-VN-01-2018 V1-0, Indicator 10.5.1 and 10.11.3 FSC-STD-RAP-VNM-01-2022 V1-0, Indicator 10.5.1 and 10.11.3
Publication date	08 January 2025
<p>Do burning activities by smallholders in regions of Vietnam, where fires do not belong to the natural ecosystem, always constitute a violation of the FSC requirements on ecologically appropriate silvicultural practices and left-over decaying biomass?</p> <p>No, burning activities by smallholders do not always constitute a violation of indicators 10.5.1 and 10.11.3 in <FSC-STD-VN-01-2018> and in <FSC-STD-RAP-VNM-01-2022>.</p> <p>Burning for site preparation is not considered a violation of FSC requirements provided that:</p> <ol style="list-style-type: none">1) Burning activities are not prohibited by national law or by the applicable Forest Stewardship Standard;2) Burning activities are applied by a small-scale smallholder belonging to a certified forest management group;3) The Group entity and respective authorities are informed about burning activities in advance;4) Burning activities are conducted under the supervision of the Group entity;5) Burning activities follow the guidance issued by the local recognized institutions (e.g., ministries);6) The small-scale smallholder has received adequate training to apply controlled burning methods;7) Burning is applied only once at the beginning of the rotation period;8) Burning is only applied on production forests and not in any protected area;9) Conservation of environmental values is not threatened by the extent of the burned area (in hectares), nor by the intensity of burning in terms of retained biomass;10) Functional protection measures are in place to prevent the fire entering buffer zones, riparian zones, representative sample areas, and human residential area such as houses and villages;11) Damage to other products and services is avoided; and12) The Group entity is aiming at minimizing and avoiding burning activities where possible.	

EUROPE

FSC-STD-DEU-03-2017

Code	INT-FSC-STD-DEU-03-2017_01
Requirement(s)	FSC-STD-DEU-03-2017 V3-0, Indicator 10.3.3
Publication date	10 July 2019
<p>The term “regeneration area” was defined. Therefore, many questions from experts being responsible for forest planning reached us.</p> <p>The regeneration area is the area for which a respective regeneration planning is prepared or available within the scope of the operational/management planning (normally 10 years) or for which a regeneration planning is prepared or available on a yearly basis (disturbance areas).</p>	

Code	INT-FSC-STD-DEU-03-2017_02
Requirement(s)	FSC-STD-DEU-03-2017 V3-0, Appendix II: 10.7.2
Publication date	10 July 2019
<p>Correction of a mistake in Glossary II of the Standard document (‘In the case of officially acting forestry authorities, these, from the perspective of private forest owners, are the authorities superior to the forestry offices.’). The mistake was noticed and made aware of by an auditor.</p> <p>Official directives to apply pesticides to the private or communal forest owner are made by the under Land law responsible authority. The remarks to the competencies for private forest owners in the German FSC-standard 3.0, Appendix II to 10.7.2 has thus become devoid of purpose.</p>	

Code	INT-FSC-STD-DEU-03-2017_03
Requirement(s)	FSC-STD-DEU-03-2017 V3-0, Indicator 10.1.1
Publication date	10 July 2019
<p>The implementation of ,mitigation and compensation measures‘ occur on the basis of procedures defined by official authorities and regulated by law (please refer to 6.9.1.b as well). Partially, such also include measures which raise the biotope value of specific species and can only be achieved through clear-cuts. Evaluation from a</p>	

nature conservation point of view is carried out by the responsible conservation authority.

If clear-cuts > 1 ha are called for in the scope of compensatory measures to enhance the conservation value in the forest, those are permitted. The measures can be equated with “species conservation and biotope tending measures based on a reasoned nature conservation concept” according to 10.1.1.

Code	INT-FSC-STD-DEU-03-2017_04
Requirement(s)	FSC-STD-DEU-03-2017 V3-0, Indicator 2.5.2
Publication date	10 July 2019

An evaluation of the quality level of the course AS-Baum I (including examination regulations, proportion of hours and content, etc.) has shown that the course is equivalent to ECC level 3, as well as to another national course mentioned in an earlier interpretation published in July 2018, offered by an organization called committee for forestry work and forestry technology (KWF). Therefore, listing AS-Baum I is an adaptation and clarification.

The requirements related to the needed qualification to work with chainsaws are only required for persons who commercially work in the forest and not for apprentices.

As “equivalent national qualification” are effective proofed examinations which have been approved before June 2018 after completing two-week long training seminar (so-called “proof of expert knowledge”) offered by forest worker schools, chainsaw courses (module A and B) run by KWF (committee for forestry work and forestry technology) or so-called course “AS-Baum I”.

Code	INT-FSC-STD-DEU-03-2017_05
Requirement(s)	FSC-STD-DEU-03-2017 V3-0, Indicator 6.5.3
Publication date	10 July 2019

Forest ecologist assume that the typical forest biodiversity is prone due to current forest management practices which include non-native tree species, short rotation periods/decline of older forests >180 years and other non-natural characteristics.

Those arguments among others have been the basis for the former FSC reference area concept as well as the new regulations of natural forest development areas (which are very alike the requirements set by the federal government.) It would contradict the idea of promoting natural forest development (on a certain small proportion of the forest area) to first dissolve the formerly demanded reference areas, conduct harvest operations on those areas and then designate the same areas as natural forest development areas according to STD 3.0 again. Since the latter need to

be proofed not later than 5 years after the first audit of STD 3.0 there would be enough time to run fellings or other operations in the meantime.

In reference areas which serve as natural forest development areas in the future and need to be established not later than within 5 years there are no fellings allowed according to the definition of the natural forest development areas. Consequently, reference areas which are taken under management again cannot be accounted for natural forest development areas again.

Code	INT-FSC-STD-DEU-03-2017_06
Requirement(s)	FSC-STD-DEU-03-2017 V3-0, Indicator 10.11.3
Publication date	10 July 2019
The standard was not coherent, correction of a mistake.	
The demand for rapid biodegradation of hydraulic fluids is also related to chain lubrication oils.	

Code	INT-FSC-STD-DEU-03-2017_07
Requirement(s)	FSC-STD-DEU-03-2017 V3-0, Indicator 10.3.5
Publication date	10 July 2019
The standard was not coherent, correction of a mistake.	
The demand for rapid biodegradation of hydraulic fluids is also related to chain lubrication oils.	

Code	INT-FSC-STD-DEU-03-2017_08
Requirement(s)	FSC-STD-DEU-03-2017 V3-0, Indicator 10.10.7
Publication date	10 July 2019
With the new standard skidding became more flexible, 13,5 % of the total forest area can be used as skid trails (before in STD 2.3 a minimum distance between skid trails of 40m had to be met unless need for exception was justified). Theoretically, falling below 20m is possible with the STD 3.0 but contradictory to low impact skidding and IGIs.	
Systematic distance between skid trails smaller than 20m are fundamentally excluded.	

FSC-STD-DNK-02-2018

Code	INT-FSC-STD-DNK-02-2018_01
Requirement(s)	FSC-STD-DNK-02-2018 V2-0, Indicators 6.2.1 and 6.2.2
Publication date	16 November 2020
Which are the identified environmental values required to be marked on relevant updated maps according to indicator 6.2.2?	
<p>The identified environmental values required to be marked on relevant updated maps according to indicator 6.2.2 include the environmental values specified in indicator 6.2.1, except for the key elements.</p> <p>'Key elements' is a term exclusive to the Danish FSC forest management standard and is not part of the FSC definition of environmental values.</p> <p>Key elements are small and they can vary largely in abundance, size and they are not always stable over time. Examples include standing or lying large, old trees that are particularly important for the biodiversity of forests, i.e. with a high proportion of micro habitats, trees with many woodpeckers holes, forests edges with bushes and trees of different heights, very large anthills, large moss-clad rocks, small water holes and trunks with significant growth of shrub-shaped lichens (see: Glossary of terms in <FSC-STD-DNK-02-2018>).</p> <p>Updating the maps with all key elements is not practically possible.</p>	

FSC-STD-GBR-03-2017

Code	INT-FSC-STD-GBR-03-2017_01
Requirement(s)	FSC-STD-GBR-03-2017 V1-0 EN, Indicators 1.5.2, 6.4.1, 6.7.1.3, 6.9.3 and 10.10.2.3, Annex J, and glossary definition of “priority species”
Publication date	30 June 2020
<p>The <FSC-STD-GBR-03-2017 V1-0 EN> definition of “priority species” includes species categorised as Near Threatened (NT), Vulnerable (VU), Endangered (ED) or Critically Endangered (CR) in the IUCN Red List. This includes species present, but not native, in the UK such as Chinese water deer and a number of non-native conifer species relevant to UK forestry. The wording in the Standard implies a requirement for a degree of protection for such species which is neither intended nor justified. Should these non-native species be accorded the same degree of protection in <FSC-STD-GBR-03-2017 V1-0 EN> as UK-native Red List species?</p> <p>No, for the purpose of <FSC-STD-GBR-03-2017 V1-0 EN>, IUCN Red List species will qualify as priority species only if they are within or geographically close to their natural range as described by IUCN global or regional lists.</p>	

FSC-STD-LUX-02-2019

Code	INT-FSC-STD-LUX-02-2019_01
Requirement(s)	FSC-STD-LUX-02-2019 V2-0, Indicator 10.10.3
Publication date	30 January 2025
Is it allowed to work with horses outside the forest roads and skid trails? Yes, horses can be used outside the forest roads and skid trails for moving single, or a couple of logs from the stump to the skid trails, or pulling a light plough for site regeneration purposes, provided that: <ul style="list-style-type: none">• these operations do not extend to the mineral soil; and• the welfare of the horses is kept in compliance with the law.	

FSC-STD-LVA-01-2023

Code	INT-FSC-STD-LVA-01-2023_01
Requirement(s)	FSC-STD-LVA-01-2023 V1-0, Indicator 1.6.4, Clarification on a “significant number of interests”
Publication date	05 April 2024
<p>According to Indicator 1.6.4 of the <FSC-STD-LVA-01-2023 The FSC Interim Forest Stewardship Standard for Latvia>: Operations cease in sites where disputes exist:</p> <ol style="list-style-type: none"> 1) Of substantial magnitude, or 2) Of substantial duration, or 3) Involving a significant number of interests. <p>What does the significant number of interests mean?</p> <p>The dispute of significant number of interests mentioned in Indicator 1.6.4 of the <FSC-STD-LVA-01-2023 The FSC Interim Forest Stewardship Standard for Latvia> generally means: “Dispute involving a majority of the affected stakeholders in each of the social, economic, and environmental sub-group.”</p>	

Code	INT-FSC-STD-LVA-01-2023_02
Requirement(s)	FSC-STD-LVA-01-2023 V1-0, Criterion 4.1, Annex H Glossary of terms Definition for Local communities, and customary rights applicability
Publication date	05 April 2024
<p>According to Criterion 4.1 of the <FSC-STD-LVA-01-2023 The FSC Interim Forest Stewardship Standard for Latvia>: The Organization shall identify the local communities that exist within the Management Unit and those that are affected by management activities. The Organization shall then, through engagement with these local communities, identify their rights of tenure, their rights of access to and use of forest resources and ecosystem services, their customary rights and legal rights and obligations, that apply within the Management Unit.</p> <ol style="list-style-type: none"> a) Are the customary rights applicable in Latvia? b) Can The Organization follow the nationally recognized concept of local communities? <p>a) No, customary rights are not applicable in Latvia, as the legal customary norms were replaced by civil rights in the Civil Code of the Republic of Latvia in 1937. The Latvian Civil Code, along with several amendments, was reinstated in 1992 after the declaration of independence from the Soviet Union.</p> <p>b) Yes. The Organization shall conform with the Annex H, Glossary of terms <FSC-STD-LVA-01-2023 The FSC Interim Forest Stewardship Standard for Latvia>, which provides the national interpretation of local communities: “local municipalities and</p>	

associations/foundations/congregations formed by local people that exist in the Management Unit and that may be affected by management activities.”

Code	INT-FSC-STD-LVA-01-2023_03
Requirement(s)	FSC-STD-LVA-01-2023 V1-0, Indicator 4.7.1, Clarification on “other relevant source of information”
Publication date	05 April 2024
<p>Indicator 4.7.1 of the <FSC-STD-LVA-01-2023 The FSC Interim Forest Stewardship Standard for Latvia> states “Through culturally appropriate engagement with the legally competent authorities and local communities, and using other relevant sources of information, The Organization identifies sites of special cultural, ecological, economic, religious or spiritual significance.”</p> <p>Can the <Karte Mantojums Government’s Portal> be used as a source of information that The Organization uses to identify sites which are of special cultural, ecological, economic, religious or spiritual significance, where they exist?</p> <p>Yes. The <Karte Mantojums Government’s Portal> can be used as a source of information to identify sites which have a special cultural, ecological, economic, religious or spiritual significance. The <Karte Mantojums Government’s Portal> prescribes the process for assigning special status to culturally and historically important sites. The stakeholders may apply to secure a special status for a particular site under the provisions of <Karte Mantojums Government’s Portal>.</p>	

Code	INT-FSC-STD-LVA-01-2023_04
Requirement(s)	FSC-STD-LVA-01-2023 V1-0, “Date of transition period”
Publication date	05 April 2024
<p>The <FSC-STD-LVA-01-2023 The FSC Interim Forest Stewardship Standard for Latvia> became effective on 15th July 2023. By when do the existing certificate holders have to transition to the revised requirements?</p> <p>The Organization shall transition to the revised set of requirements within 12 months from the effective date. All certificates issued against the previous version will automatically expire and be considered terminated six months after the transition end date.</p>	

Code	INT-FSC-STD-LVA-01-2023_05
Requirement(s)	FSC-STD-LVA-01-2023 V1-0, Scope, Section A.2
Publication date	05 April 2024
<p>Is <FSC-STD-LVA-01-2023 The FSC Interim Forest Stewardship Standard for Latvia> a national standard, applicable for all types of forests in Latvia?</p> <p>Yes, the <FSC-STD-LVA-01-2023 The FSC Interim Forest Stewardship Standard for Latvia>, effective since 15th July2023, is the official FSC-endorsed locally adapted Forest Stewardship Standard for Latvia. According to section A.2 (Scope) of the <FSC-STD-LVA-01-2023 The FSC Interim Forest Stewardship Standard for Latvia> this standard is applicable to all forest types and all types of ownership including public, private and local government owned forests.</p>	

FSC-STD-POL-01-2-2013

Code	INT-FSC-STD-POL-01-2-2013_01
Requirement(s)	FSC-STD-POL-01-2-2013 V1-2, Indicator 1.1.1, Annex 1
Publication date	27 September 2021
<p>Is an auditor required to analyze inquiries raised by stakeholders related to Principle 1 (Compliance with the laws and FSC principles) or in general any issues that come to auditor’s attention during standard audit proceedings, which are not typical silvicultural operations performed in forests but relate, directly or indirectly, to land included in the scope of certification and managed by The Organization?</p> <p>Instances include: maintenance and renovating of old forest rangers’ houses, compliance with water permits, compliance with construction law, leasing of non-forest lands, compliance with various administrative regulations etc.</p> <p>Yes, the auditor shall analyze all inquiries and questions raised by third parties regarding certificate holder’s activity within FMU, and assess:</p> <ul style="list-style-type: none"> a) If the activities are within the scope of certification and occur on the facilities or area contributing to the objective of Management Plan. b) If the activities within the scope of the certification conform with the standard <FSC-STD-POL-01-2-2013> with special attention to the laws listed in Annex 1. 	

FSC-STD-PRT-01-2016

Code	INT-FSC-STD-PRT-01-2016_01
Requirement(s)	FSC-STD-PRT-01-2016 V1-1, Indicator 6.5.1, 6.5.2 and 6.5.3
Publication date	21 November 2023
<p>1. According to Indicator 6.5.1 of the <FSC-STD-PRT-01-1-2016, The FSC National Forest Stewardship Standard of Portugal>, native ecosystems that exist or would exist under natural conditions within the Management Unit (MU) shall be identified using the best available information. The areas of native ecosystems shall be protected to be compliant with Indicator 6.5.2 of the <FSC-STD-PRT-01-1-2016, The FSC National Forest Stewardship Standard of Portugal>, and those areas are not required to be restored to more natural conditions. Restoration according to Indicator 6.5.3 of the <FSC-STD-PRT-01-1-2016, The FSC National Forest Stewardship Standard of Portugal> is required if representative sample areas do not exist or where existing sample areas inadequately represent native ecosystems</p> <p>a. Does Montado area, which is representative of Natura 2000 Habitat 6310 ‘Montados with evergreen Quercus spp.’ qualify to be included as representative area of a native ecosystem and therefore needs to be protected as per Indicator 6.5.2 of the <FSC-STD-PRT-01-1-2016, The FSC National Forest Stewardship Standard of Portugal>? Or</p> <p>b. Does the area need to be restored to more natural conditions e.g., Natura 2000 Habitat 9330 ‘Quercus suber forests’) as per Indicator 6.5.3 of the <FSC-STD-PRT-01-1-2016, The FSC National Forest Stewardship Standard of Portugal>?</p> <p>a) Yes, Montado areas that have the characteristics of Natura 2000 Habitat 6310 “Montados with evergreen Quercus spp.”, are eligible to be included as a representative area of a native ecosystem as they qualify as native ecosystems according to the definition in <FSC-STD-01-001 Principles and Criteria>.</p> <p>b) Where the representative samples of native ecosystems (e.g., Natura 2000 Habitat 6310 ‘Montados with evergreen Quercus spp’, Natura 2000 Habitat 9330 ‘Quercus suber forests’, or others) identified in the assessment as per Indicator 6.5.1 of the <FSC-STD-PRT-01-1-2016, The FSC National Forest Stewardship Standard of Portugal> do not exist or are insufficient, then there is need to conduct restoration to more natural conditions as per Indicator 6.5.3 of the <FSC-STD-PRT-01-1-2016, The FSC National Forest Stewardship Standard of Portugal>.</p> <p>2. In cases where a proportion of the MU must be restored to more natural conditions, what does restoration to more natural conditions mean as per Indicator 6.5.3 of the <FSC-STD-PRT-01-1-2016, The FSC National Forest Stewardship Standard of Portugal>?</p> <p>The intention of Indicator 6.5.3 of the <FSC-STD-PRT-01-1-2016, The FSC National Forest Stewardship Standard of Portugal> is to restore the area to a more natural condition. This does not imply the recreation of any particular previous, pre-historic, pre-industrial or other pre-existing ecosystem.</p>	

FSC-STD-SWE-03-2019

Code	INT-FSC-STD-SWE-03-2019_01
Requirement(s)	FSC-STD-SWE-03-2019 V3-0, Indicators 6.6.2 and 6.6.13
Publication date	3 April 2024
<p>Forest management in production stands of beech and oak is focused on increasing the value of individual trees. Indicator 6.6.2 of the <FSC-STD-SWE-03-2019, The Forest Stewardship Standard of Sweden> requires retention of at least 10 trees with a diameter representative of the stand, or larger, per hectare in a felled area.</p> <p>Are there alternative ways to demonstrate conformance to indicator 6.6.2 in production stands of beech and oak?</p> <p>Yes, in managed production stands of oak and beech the conformity with the indicator 6.6.2 of the <FSC-STD-SWE-03-2019, The Forest Stewardship Standard of Sweden> can be demonstrated by a combination of following measures:</p> <ol style="list-style-type: none"> 1) Retaining minimum of 5 oak or beech trees per hectare, including biodiversity trees, if present, and 2) Retaining a minimum of other 5 retention trees per hectare of other tree species, if present, and/or 3) Creating high stumps in beech stands where trees of the other tree species are too few. The high stumps can replace any trees missing for reaching the 10 trees per hectare. The high stumps are cut at the highest safe height based on the felling conditions. They can be retained at any time during the harvesting and regeneration phase. <p>NOTE: The high stumps described in point (3) are additional to the two high stumps that shall be left according to indicator 6.6.13 of the <FSC-STD-SWE-03-2019, The Forest Stewardship Standard of Sweden>. There is no requirement to create additional high stumps in oak stands.</p>	

Code	INT-FSC-STD-SWE-03-2019_02
Requirement(s)	FSC-STD-SWE-03-2019 V3-0, Indicators 4.5.1; 6.4.1; 6.5.1; 6.5.2 and 7.2.1
Publication date	6 September 2024
<p>Can a simplified map-based management plan be sufficient for showing conformity with indicator 7.2.1 for The Organization having a Management Unit smaller than 20 ha when taking into consideration the scale, intensity, and risk?</p> <p>Yes, for The Organization having a Management Unit smaller than 20 ha, a simplified map-based management plan is sufficient for showing conformity with indicator 7.2.1, provided</p>	

that the map-based management plan reflects the management policies and objectives and the boundaries of the management unit(s) and, when present:

- forest stands dominated by deciduous trees,
- exotic tree species,
- known Woodland Key Habitats,
- High Conservation Value areas, and
- any areas specified by indicators 4.5.1, 6.5.1 and 6.5.2.

The simplified map-based management plan shall be updated if Woodland Key Habitats or High Conservation Value areas are identified during conservation value assessments.

NOTE: In a group certification, the conformance with area thresholds specified in the applicable Forest Stewardship Standard for Criterion 6.5 can be demonstrated across management units rather than at the level of the individual management unit (see: Clause 4.2 in <FSC-STD-30-005 V2-0 Forest Management Groups>). In these cases, individual group members with a Management Unit of less than 20 ha may be exempted from the requirement to document areas for 6.5.1 and 6.5.2. Woodland Key Habitats are exempted from management activities according to 6.4.1.

Code	INT-FSC-STD-SWE-03-2019_03
Requirement(s)	FSC-STD-SWE-03-2019 V3-0, Indicator 10.5.4
Publication date	3 April 2024
<p>What is applicable regarding 10.5.4 of the <FSC-STD-SWE-03-19, The Forest Stewardship Standard of Sweden> sub-indicators (a) and (b) respectively? Should it be read as (a) and (b), or should they be read as either (a) or (b)?</p> <p>Indicator 10.5.4 of the <FSC-STD-SWE-03-19, The Forest Stewardship Standard of Sweden> states that untested methods and materials are either:</p> <ul style="list-style-type: none"> • investigated by universities, colleges, research institutions, or national authorities within the management unit in conformity with sub-indicator (a), or • investigated in experimental trials by the certificate holder in conformity with sub-indicator (b). 	

FSC-STD-UKR-01.1-2024

Code	INT-STD-UKR-01.1-2024_01 (also published under FSC-STD-20-001 with code INT-STD-20-001_50, and FSC-STD-01-001 (V5-3) with code INT-STD-01-001_18)
Requirement(s)	FSC-STD-UKR-01.1-2024 V1-1, Indicators 1.1.1 and 1.1.2 FSC-STD-01-001 V5-3, Preamble, Section 5 FSC-STD-20-001 V4-0, Clauses 1.2.3. I), 1.4.6, 4.8.3
Publication date	29 January 2025

1. Can a CB grant forest management certification to a single Forestry Unit belonging to a branch “XXXXXXX Forest Office” of the State Specialized Forest Enterprise (SFE)?

Yes, a CB can grant certification to a single Forestry Unit belonging to a branch “XXXXXXX Forest Office” of the State Specialized Forest Enterprise (SFE), provided that the Forestry Unit:

- a) Conforms with the FSC definition of The Organization and can take responsibility for decisions, policies and management activities related to the Management Unit as required by the Preamble, Section 5 in <FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship>,
- b) Has organized the forest areas aimed to be certified as a single or multiple Management Units (MU) according to the FSC definition of a MU (see Glossary of Terms in <FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship>, and
- c) Demonstrates conformity with the <FSC-STD-UKR-01.1-2024 V1-1 The FSC Forest Stewardship Standard for Ukraine>.

No later than by the next scheduled evaluation, the CB shall evaluate the consequences of the change of scope of the certification and reflect the new name and structure of The Organization as specified in Clauses 1.2.3. I); 1.4.6 and 4.8.3 of <FSC-STD-20-001 V4-0 General Requirements for FSC Accredited Certification Bodies>.

NOTE 1: During the time period when the CB is evaluating the changes and circumstances affecting certification, and no later than by the next scheduled evaluation, the existing certification granted to the branches of SFE "Forests of Ukraine" remains valid.

NOTE 2: The legal registration of the SFE “Forests of Ukraine” extends to the units it has established, including Forestry Units.

2. Are CBs in Ukraine expected to require their clients “SFE Forests of Ukraine, branch XXXXXX Forest Office, Forestry Unit XXXXXX” to sign the most recent version of the ‘License Agreement for the FSC Certification Scheme’, in response to the reorganisation and changes in the structure of the SFE "Forests of Ukraine"?

Yes, in response to the changes in the structure and legal ownership of the State Specialized Forest Enterprise "Forests of Ukraine", the CB shall require The Organization within a period of two (2) months to enter into and hold the most recent version of the 'License Agreement for the FSC Certification Scheme', as well as ensure that the signed agreements uniformly identify the contracting party according to the following example: "SFE Forests of Ukraine, branch XXXXXXX Forest Office, Forestry Unit XXXXXXX" .

LATIN AMERICA

This section remains unfilled, as no interpretations have been formulated thus far.

NORTH AMERICA

FSC-STD-CAN-01-2018

Code	INT-FSC-STD-CAN-01-2018_01
Requirement(s)	FSC-STD-CAN-01-2018 V1-0, Indicator 6.4.5b, Table 6.4.5 #4
Publication date	24 February 2023
<p>When evaluating the “Required Management Strategy” #4 of Table 6.4.5 (Indicator 6.4.5b),</p> <p>1. Does the statement “the area remains reserved for the duration of that period” mean that the 50% of undisturbed habitat to be set aside is in fact to be reserved for 50 years?</p> <p>No, the 50% of the undisturbed habitat as of January 1, 2018 in the portion of the management unit that is within caribou range is set aside for at least 30 years (until 2048), and remains reserved until the < 35% disturbance threshold is met and can be maintained over time. The <35% disturbance threshold shall be met at the latest by year 50 (before 2068).</p> <p>One intended outcome of the “Required management strategies” outlined in Table 6.4.5 is to lower the % of cumulative disturbance in the portion of the Management Unit that overlaps the caribou range to a level equal to or lower than 35%. The “Required Management Strategy” #4, outlined in the table follows the same objective. The set-aside of 50% of the undisturbed habitat as prescribed by “Required Management Strategy” #4 is a means to reach that outcome.</p> <p>2. Does the phrase “in the remaining areas” refer to the rest of the area in the portion of the Management Unit that is within a caribou range excluding the 50% undisturbed habitat set aside?</p> <p>Yes, the “<i>remaining area</i>” refers to the rest of the area in the portion of the Management Unit that is within a caribou range excluding the 50% undisturbed habitat set aside. An increase in disturbance in the remaining areas may only occur when linked to a plan demonstrating that the < 35% disturbance threshold will be met before year 50 for the entirety of the portion of the management unit that is within caribou range.</p> <p>3. Does the 30-to-50-year timeframe start at January 1, 2018?</p> <p>Yes, the timeframe is fixed and starts on January 1, 2018, regardless of when the audit occurs.</p> <p>4. Is it possible that a disturbed area as of January 1, 2018, become “undisturbed” under the 30–50-year timeframe?</p> <p>Yes, it is. The terms “undisturbed habitat” and “cumulative disturbance” as used in Indicator 6.4.5, are defined in the Glossary of <FSC-STD-CAN-01-2018>. A disturbed area accounted for in the cumulative disturbance calculation can be removed from the calculation as it becomes undisturbed or restored. As described in the definition, a 40-year benchmark for considering landscapes as undisturbed can be used in the absence</p>	

of an empirical basis for another benchmark. That benchmark may be variable depending on the regeneration success or other factor(s). Another method for identifying undisturbed area is the approach used by Environment and Climate Change Canada (ECCC). For anthropogenic disturbance, ECCC considers a habitat as disturbed when the disturbance is visible using Landsat at a scale of 1:50 000¹. The benchmark and method used needs to be based on best available information, and peer supported science.

NOTE: FSC Canada recognizes that landscapes identified with this approach are not necessarily equivalent to good caribou habitat.

¹ Environment and Climate Change Canada (2016) Range Plan Guidance for Woodland Caribou, Boreal Population.

Code	INT-FSC-STD-CAN-01-2018_02
Requirement(s)	FSC-STD-CAN-01-2018 V1-0, Indicator 6.4.5c
Publication date	01 March 2023

While the Indicator 6.4.5c’s first Intent Box mentions that approach 6.4.5c “provides a means to implement management other than those identified by Approach 6.4.5b”, the text of Indicator 6.4.5c states that the “caribou conservation approach” be “consistent with the Range Plan Guidance for Woodland Caribou”, for Boreal population published in 2016 by the Environment and Climate Change Canada (ECCC 2016).

Can the “caribou conservation approach” “consistent with the Range Plan Guidance for Woodland Caribou” be different from the Range Plan Guidance if it avoids the destruction of woodland caribou critical habitat?

Yes, but a “caribou conservation approach” should include the following elements to be “consistent with” the Environment and Climate Change Canada (ECCC 2016)¹ Range Plan Guidance:

1. The overall outcome of the ECCC Guidance and the FSC Canada indicator on woodland caribou is to maintain and, as necessary, improve the current status of the woodland caribou population. Any caribou conservation approach should demonstrate actions that aim to meet that ultimate outcome.
2. The Species At-Risk Act (SC 2002) and the Recovery Strategy focus on critical habitat protection to achieve the outcome. The ECCC Guidance does not prescribe how to protect critical habitat, but it describes range-specific activities likely to result in the destruction of critical habitat.¹ These activities include:
 - Any activity resulting in the direct loss of boreal caribou critical habitat.
 - Any activity resulting in the degradation of critical habitat leading to a reduced but not total loss of both habitat quality and availability for boreal caribou.
 - Any activity resulting in the fragmentation of habitat by human-made linear features.

The likelihood that critical habitat will be destroyed increases if one or a combination of the above activities occur and if even after mitigation techniques, any one of the following occurs:

- the ability of a range to be maintained at 65% undisturbed habitat (or the threshold determined at item #5 of Option C) is compromised;
- the ability of a range to be restored to 65% undisturbed habitat (or the threshold determined at item #5 of Option C) is compromised;
- connectivity within a range is reduced;
- predator and/or alternate prey access to undisturbed areas is increased; or
- biophysical attributes necessary for boreal caribou are removed or altered.

3. Indicator 6.4.5 Option C requirements 1 to 9 are required elements to be included in the “caribou conservation approach”.

NOTE: The Range Plan Guidance for Woodland Caribou (ECCC 2016) provides general (non-prescriptive) guidance on the development of range plans, as well as Environment and Climate Change Canada’s perspective regarding the desired content of a range plan.

¹ Environment and Climate Change Canada (2016) Range Plan Guidance for Woodland Caribou, Boreal Population. Section 6, p.11-12.

Code	INT-FSC-STD-CAN-01-2018_03
Requirement(s)	FSC-STD-CAN-01-2018 V1-0, Indicator 6.4.5c #5
Publication date	01 March 2023

The requirement #5 of the Indicator 6.4.5c allows for the incorporation of an alternative habitat disturbance threshold informed by experts to be used for managing a caribou range.

1. Do experts need to:

- **be directly involved in determining the alternative habitat disturbance threshold?**
- **confirm the validity of the alternative habitat disturbance threshold specific to the caribou range and local context?**

No, an expert does not need to be directly involved, nor does formal confirmation (validity) need to be provided by an expert as long as it can be demonstrated that the threshold was determined for the specific range and local context and was developed using best available information and peer-reviewed science.

The intent is that any alternative disturbance threshold is based on information coming from or authored by expert(s) (best available information and peer-reviewed science) applicable to the specific caribou range and local context relevant to the Management Unit. It shall be demonstrated that the approach fosters stewardship of caribou habitat that supports self-sustaining caribou populations. Using information coming from or authored by expert(s) and taking the collaborative process into account, The Organization shall demonstrate that the approach is based on best available information

and peer-reviewed science providing a clear rationale for a threshold that is lower than the 65% as identified by ECCC.

2. Is the involvement of government representatives or stakeholders in the review of the forest management plan that includes the caribou conservation plan sufficient to satisfy the requirement?

No, involvement in the process by a government representative or stakeholder does not automatically qualify the person as an ‘expert’. To be considered an expert, the qualifications of the person shall meet the definition of “expert” as described in FSC Canada’s Standard (FSC-STD-CAN-01-2018) Glossary. Information coming from or authored by expert(s) shall be relevant to the specific caribou range and local context and based on best available information and peer-reviewed science.

3. If the decision is to manage the range using the 65% minimum undisturbed habitat threshold identified by Environment and Climate Change Canada (ECCC) in its Action Plan for Woodland Caribou (*Rangifer tarandus caribou*), Boreal Population in Canada: Federal actions 2018, does it still need to be informed by an expert?

No, if the range is managed using the 65% undisturbed habitat threshold as identified by ECCC, it is considered that this is consistent with the Federal Range Plan Guidance and has the support of peer-reviewed science.

Code	INT-FSC-STD-CAN-01-2018_04
Requirement(s)	FSC-STD-CAN-01-2018 V1-0, Indicator 6.4.5c elements #1 and #9
Publication date	01 March 2023

The requirement # 1 of the Indicator 6.4.5c requires “An assessment of the status of population in the Management Unit” and the requirement #9 of the Indicator 6.4.5c requires “Monitoring of habitat condition and population response”. In most cases, the government is responsible for assessing caribou populations on public lands and this is usually done at the range level.

1. If government-led caribou population assessment and monitoring programs are in place at the range level, is an additional assessment of the status of population (requirement #1) and monitoring of habitat condition and population response (requirement #9) needed at the Forest Management Unit level?

No, when a government-led caribou population assessment (requirement #1) and monitoring program(s) (requirement #9) are in place at the range level, an additional assessment is not necessary for the portion of the range that is within the Forest Management Unit, unless other best available information (BAI) is available or if the information is outdated (see questions 2 and 3).

2. If government-led caribou population assessment and monitoring programs are in place but other best information & peer reviewed science are available, should The Organization consider these other sources?

Yes, but each context should be assessed independently, as per the BAI, peer-reviewed science and direction provided through the efficient collaborative process to ensure that the status of the population in the Management Unit can be assessed with the best existing information.

The intent is that a caribou conservation approach, including the data used to assess the status of a population and to monitor the habitat condition and population response, should be informed by BAI (as defined in the Glossary of <FSC-STD-CAN-01-2018 EN>) and peer-reviewed science. In most cases the government is responsible for conducting assessments and implementing monitoring programs, but BAI may include (but is not limited to) other information sources such as Indigenous-led monitoring, traditional knowledge or The Organization and/or partner-generated data. In any case, the participants in an efficient collaborative process can direct what is relevant and at what duration and scale additional data collection measures are needed.

3. If there is no government assessment of the population (requirement #1) and/or a monitoring program (requirement #9) or if the available data is outdated, is The Organization responsible to complete an assessment and conduct monitoring?

Yes, if there is no government assessment of the population (requirement #1) and/or a monitoring program (requirement #9), The Organization works within the collaborative process and with partners where possible, to acquire data and/or develop a monitoring program.

4. If the available data are outdated, as determined by peer-reviewed science and direction provided through an efficient collaborative process, The Organization works within the collaborative process and with partners where possible, to support the acquisition of updated assessment or monitoring data.

The Preamble of the <FSC-STD-CAN-01-2018 EN> is clear in its introduction: *“The Organization may rely on the efforts of other parties who play a role in meeting certain requirements (e.g., government entities, Indigenous Peoples and stakeholders). Where gaps in performance exist, it is the responsibility of The Organization to address these gaps, within their sphere of influence”.*

Code	INT-FSC-STD-CAN-01-2018_05
Requirement(s)	FSC-STD-CAN-01-2018 V1-0, Indicators 6.4.5c #4 and #5
Publication date	03 May 2023
<p>Can evidence of an “efficient collaborative process” that is progressing in good faith be sufficient to conclude conformance to Indicator 6.4.5c #4 and #5 despite not yet having determined an alternative disturbance threshold that supports a self-sustaining caribou population?</p> <p>Yes, if evidence can be provided that the “efficient collaborative process”, as defined in the Glossary of <FSC-STD-CAN-01-2018 EN>, includes progress (e.g., a measurable plan and timeline) on incorporation of a disturbance threshold (Requirement #5) and measures that</p>	

support self-sustaining caribou populations (Requirement #4), conformity can be demonstrated by continuing the process.

Meanwhile, in the absence of an alternative threshold, a 35% disturbance threshold, based on the guidance from Environment and Climate Change Canada (ECCC), is the only identified threshold that has an acceptable likelihood of supporting a self-sustaining caribou population over time when the habitat management measures are duly implemented.

The collaborative process can determine how the 35% disturbance threshold is best incorporated to meet habitat requirements appropriate to the specific context of the MU until an alternative threshold is determined.

NOTE: In order to demonstrate conformance with Indicator 6.4.5c, The Organization shall conform with all requirements #1 to #9.

CIS

This section remains unfilled, as no interpretations have been formulated thus far.