



Forest Stewardship Council®



PSU Review Report of

FSC-POL-20-002 V1-0 Partial Certification of
Large Ownerships

Version 2-0



Status:	Final report
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PSU Review Report

Version 2-0

The Forest Stewardship Council (FSC) is an independent, not for profit, non-government organization established to promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC's vision is that the true value of forests is recognized and fully incorporated into society worldwide. FSC is the leading catalyst and defining force for improved forest management and market transformation, shifting the global forest trend toward sustainable use, conservation, restoration, and respect for all.

Summary and recommendation

Reviewed Document

Document code	FSC-POL-20-002
Document title	Partial Certification of Large Ownerships
Objective of document	The Policy explains FSC's position regarding partial certification of large ownerships and compliance with Criterion 1.6 ('FSC commitment') in the Principles and Criteria V4
Last approval date	2000
Review triggered by	<input checked="" type="checkbox"/> Regular review as scheduled
	<input type="checkbox"/> GA Motion or Board decision
	<input checked="" type="checkbox"/> New or changed FSC policies or legislation
	<input type="checkbox"/> Change Requests
	Other (please specify): <input checked="" type="checkbox"/> Redundant: superseded by PfA and other core FSC normative documents but not formally withdrawn from the normative framework.
Reviewer	Diana Franco Gil (PSU Policy Manager) Maria Melero (Programme Manager Forest Management) Achim Droste (PSU Chief Policy Officer)
Contact details	forestmanagement@fsc.org
Draft Review Report	29 June 2021
Public consultation	08 July 2021 – 19 August 2021
Final Review Report	20 September 2021

Recommendation

<input type="checkbox"/>	Full revision
<input type="checkbox"/>	Minor revision
<input type="checkbox"/>	Editorial revision
<input type="checkbox"/>	No revision
<input checked="" type="checkbox"/>	Withdrawal

I. Introduction

This report has been developed according to Clause 9.6 of FSC-PRO-01-001 V3-1 *The Development and Revision of FSC Normative Documents* to assess the continued relevance and effectiveness of a normative document. This is a mandatory step before a normative document can be taken to revision or withdrawal. In addition, it responds to the Board requirement for a feasibility and impact assessment of the proposed action, mandated at their 71st meeting.

II. Proposed recommendation and justification considering the consultation results

PSU recommends the immediate withdrawal of FSC's [Policy FSC-POL-20-002 V1 Partial Certification of Large Ownerships](#) as the document was replaced by the FSC-POL-01-004 [Policy for the Association of Organizations with FSC](#) (PfA). Its core content had even been invalidated prior to this replacement by an interpretation suspending the provisions for FSC members. This withdrawal is a formality that contributes to streamlining and simplifying the normative framework.

FSC-POL-20-002 V1, approved in 2000, links to Criterion 1.6 ('FSC commitment') in the FSC Principles and Criteria V4 (replaced by a new version in 2012) and to Para 29 of the FSC By-Laws (withdrawn in 2013). It was originally designed as a control measure against greenwashing by requiring The Organization to also demonstrate commitment to adhere to the FSC Principles and Criteria on any other Management Unit outside of the scope of certification owned or managed by them. Certification bodies were responsible for evaluating this commitment solely based on feedback from stakeholder consultation. There was no provision for field inspections of Management Units outside of the scope of certification.

In 2012, [a revised version \(V5\) of the FSC Principles and Criteria](#) (P&C) was approved. It still requires The Organization to demonstrate commitment to adhere to the FSC Principles and Criteria (now in Criterion 1.8), but certification bodies now evaluate conformity based on a publicly available policy statement as required by IGI 1.8.1 of [FSC-STD-60-004 V2-0 International Generic Indicators](#).

The control of The Organization's commitment for Management Units outside of the scope of certification is now regulated by FSC-POL-01-004 [Policy for the Association of Organizations with FSC](#) (PfA), which is the result of a revision of the FSC-POL-20-002.

FSC-POL-20-002 was first revised in 2005. The revised policy (V2) was invalidated by the FSC Board of Directors a year after its approval due to shortcomings and inconsistencies with the FSC Controlled Wood standards, which were under revision at the time and stakeholder concerns regarding the revision process. V1 was reinstated.

In 2007 a new revision started. In 2008, while still in the revision process, the requirement for members to commit to certify all the operations within a reasonable

time frame was invalidated (see [INT-POL-20-002_01](#)) as a result of the ongoing revision process and the emerging new approach for a broader 'Policy for Association'. In 2009 the final draft 2-2 of the revised policy FSC-POL-20-002 V3-0 was approved by the FSC Board, and subsequently published under a new name and a new code, reflecting its fundamentally new character and scope: *FSC-POL-01-004 Policy for the Association of Organizations with FSC* (PfA). However, for unclear reasons, its predecessor was not removed from the catalogue of normative documents.

The PfA establishes a mechanism against greenwashing directly managed by FSC. Adherence to the PfA is formalized by signing FSC's trademark license agreement (TLA) which contains a self-declaration, by which certificate holders signing the TLA declare that they read, understood and accept the PfA.

With the new version of the FSC Principles and Criteria, the withdrawal of the FSC By-Laws and the installment of the PfA, the *FSC-POL-20-002 Policy on Partial Certification of Large Ownerships* has long become obsolete and its continued listing as a normative document can only be considered an oversight.

Some stakeholders have commented that FSC should reinstate the explicit requirement for members to seek certification of a significant part of their production forest within a reasonable time frame (see Section IV. Stakeholder consultation and feedback). However, this should be done outside of this review and withdrawal process, which is a formality and does not change the existing requirements or direction provided by FSC.

Another common message received in the consultation is the need to increase certification uptake and both the system and membership integrity

III. Impact analysis

No negative impacts are foreseen. All relevant aspects that were addressed in FSC-POL-20-002 are well covered, even improved, by the succeeding documents or have been invalidated years ago. See Annex 1. Assessment of the FSC-POL-20-002 Policy on Partial Certification of Large Ownerships (2000).

The withdrawal of the outdated and conflicting policy FSC-POL-20-002 will contribute to the streamlining and simplification of the FSC Normative Framework and therefore deliver on [FSC's Global Strategy 2021-2026](#).

It is foreseen that FSC's stakeholders such as auditors, forest managers, standard development groups, and the Secretariat will benefit from the withdrawal as it will bring clarity and consistency to the FSC Normative Framework.

IV. Stakeholder consultation and feedback

Methodology

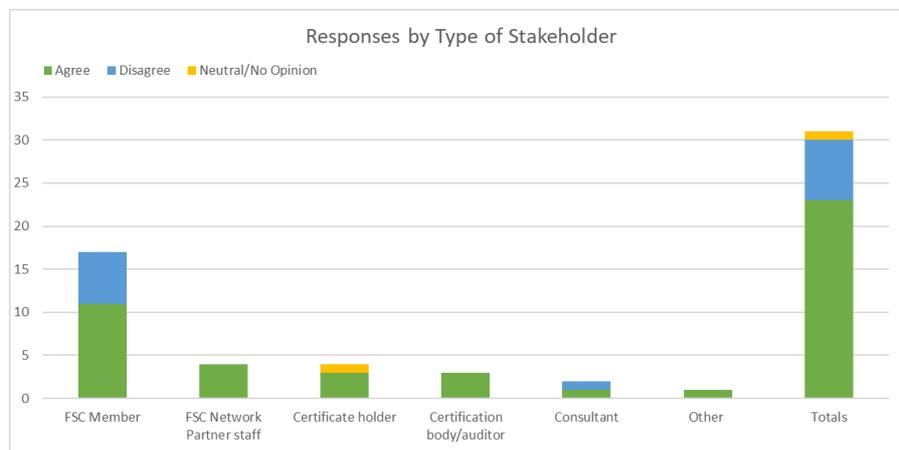
Stakeholders were invited to provide feedback on the draft review and withdrawal report available in English and Spanish from 8th July 2021 until 19th August 2021 via the FSC consultation platform. The secretariat informed the relevant stakeholders listed in FSC-PRO-01-001 V3-1 *Development and Revision of FSC Normative Documents* about the consultation.

Results

In total PSU received 32 responses from stakeholders from 18 countries: 23 of the respondents agreed with withdrawing the policy, 7 disagreed and 1 did not present an opinion (see figures below).

Type of Stakeholder	Agree	Disagree	Neutral/ No Opinion
FSC Member	11 ¹	6	0
FSC Network Partner staff	4	0	0
Certificate holder	3	0	1
Certification body/auditor	3	0	0
Consultant	1	1	0
Other	1	0	0
Totals	23	7	1

Table 1. Responses by type of stakeholder



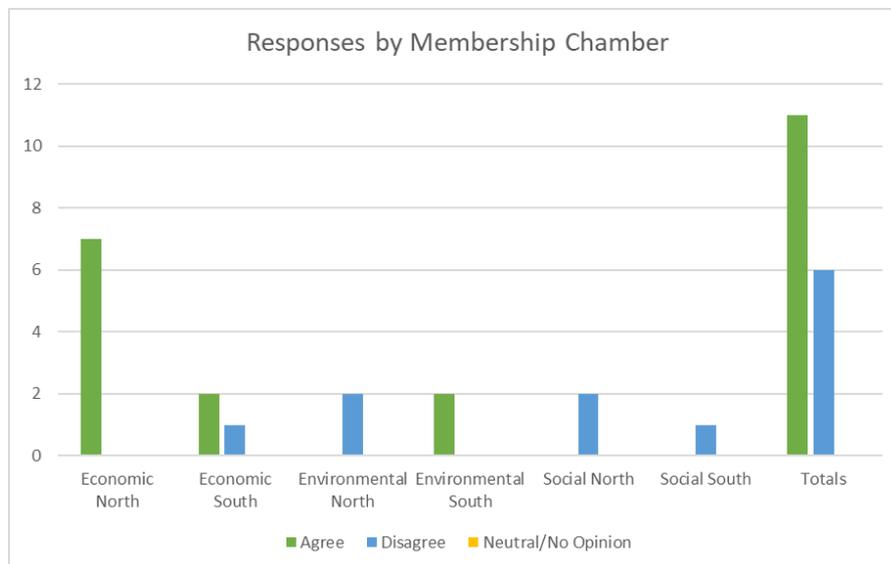
Graphic 1. Responses by type of stakeholder

¹ Four of the FSC members identified themselves also as certificate holders

From the FSC membership, most of the responses were from the Economic North sub chamber, all of them of support. The number of responses and opinions from the rest of the sub chambers was balanced, as illustrated in the figures below:

Membership Chamber	Agree	Disagree	Neutral/ No Opinion
Economic North	7	0	0
Economic South	2	1	0
Environmental North	0	2	0
Environmental South	2	0	0
Social North	0	2	0
Social South	0	1	0
Totals	11	6	0

Table 2. Responses by sub chamber



Graphic 2. Responses by sub chamber

The main reasons for supporting the withdrawal are:

- It is redundant and overlaps with existing documents, withdrawing it is part of the management of the normative framework.
- It is important to simplify and streamline the normative framework and keep consistency with other normative documents.
- The relevant aspects addressed in the policy have been incorporated in the FSC Principles and Criteria V5-2 and Policy for Association, and even improved.
- It was always unrealistic to expect an organization to bear the cost of certification on management units where markets didn't exist.
- Language is outdated (e.g., white washing).

The main reasons for disagreeing with withdrawal are:

Stakeholders' feedback	PSU response
<p>A revision is preferred to consider options to achieve the aim of the policy that is to promote responsible management increasing the number of management units (MU) certified and uptake of FSC generally, and ensuring that companies are not using FSC as greenwash by only having a few MUs certified.</p> <p>This element not included in any other document and is in line with the FSC Global Strategy and the CW Strategy. It would aid in transitioning controlled wood certificates to FM certificates, being a more a stepwise approach than a PfA one.</p>	<p>The aim of the policy is to explain FSC's position regarding partial certification based on the existing rules in the system at that moment.</p> <p>Two important aspects to add to the consulted report are:</p> <ol style="list-style-type: none"> 1) the requirement for FSC members to have a significant part of their production forests certified or be certified within a reasonable time frame was invalidated in 2008 and it is not enforceable anymore. See INT-POL-20-002_01 in the collection of Forest Management Interpretations, which clarifies this. This was confirmed in the revision of the By-laws. 2) There were two attempts to revise the policy. The second one resulted in the first version of FSC-POL-01-004 <i>Policy for the Association of Organizations with FSC</i>, which replaced the FSC-POL-20-002, although this last was never formally withdrawn from the catalogue of normative documents. Therefore, this policy is not valid anymore and its withdrawal is just a formality. <p>A discussion about how to increase the uptake of FSC has to take place separately from this process.</p>
<p>A review of the membership component is also quite critical as without the Bylaw there is considerable risk to FSC as an organisation.</p>	<p>This requirement\component is invalid since 2008 and the policy was replaced by the PfA. A discussion on this topic should happen outside this withdrawal process, which is at this stage just a formality.</p>
<p>A revision is an opportunity to re-think how to increase certification, reduce greenwashing and increase system and membership integrity.</p>	<p>The revision was conducted resulting in the PfA, which addresses reduction of greenwashing and is currently <u>under revision</u>.</p> <p>The withdrawal of the policy is only a formality and should have happened long ago.</p>
<p>The Association Policy is under revision. Therefore, it is not convenient to refer to or base a decision on a document that</p>	<p>The PfA is the successor of the FSC-POL-20-002. The revision of the PfA takes into account previous discussions</p>

Stakeholders' feedback	PSU response
has not yet been approved and it is not known what its content will be.	around the topic, but the withdrawal of an old version cannot be linked to the revision results.
The efforts made in the process of defining the Controlled Wood Strategy (promoting CW to advance towards FSC certification) are proving quite useless so far. The absence or weak commitment shown by many companies (in different ways) shows the need for the policy to be maintained.	As mentioned above the commitments in this policy have been incorporated in the revised FSC Principles and Criteria V5-2, PfA or invalidated. This process is not the adequate to address the concerns expressed.
The elimination of a document does not necessarily contribute to give clarity and coherence to the normative framework.	In this case it does as the document is redundant, outdated and/or invalid.
In the report document it is said that the regulations were eliminated. I have not even seen any analysis that shows that such removal was convenient. For many cases I consider that it was a mistake to eliminate them	We assume that this comment refers to the withdrawal of the FSC By-Laws, which is out of the scope of this review and withdrawal process.
This policy was also relevant for the certification body in their evaluation of the other MUs owned by the applicant or the certificate holder but not included in the scope. Maybe a revision of the policy in order to provide more information and clear requirements for evaluation of MUs (especially the practices performed by the organization when the forest is not FSC) not in the scope of the FSC certificate would be good.	Certification bodies are not required to conduct evaluations outside the certified management unit(s). Moreover, the objective of a policy is to provide the fundamental approach towards a topic rather than specific requirements.
The PSU review does not seem to consider that there are at least three versions of the policy: <ul style="list-style-type: none"> • V1-0 of June 2000, • V2-0 of May 2002 and • V3-0 of October 2007 which do not cover all the same topics.	The information about the revisions was not included in the consulted review report and provides additional arguments to formally withdraw the policy. The policy has been revised in two occasions: <ul style="list-style-type: none"> • V1-0 is the version listed in the normative documents catalogue and which is requested to be withdrawn in this process. • V2-0 was approved by the Board in 2005 and suspended in 2006 due to significant stakeholders' concerns about the content and implementation. • V3-0 resulted in the current PfA, which replaced V1-0, expanding its scope beyond FM certificates.

Stakeholders' feedback	PSU response
	However, FSC-POL-20-002 V1-0 was not formally withdrawn, and that is why the current process is being conducted.
The PSU review report does not indicate clause by clause which of the POL-20-002 clauses have been entirely taken up into or replaced by which clause in which other normative document, and therefore it seems precautionary to hold FSC-POL-20-0002 <i>either</i> until a revised review report clarified precisely where and how each clause has been adopted or replaced, <i>or</i> until the revision of the PfA has been completed and that process itself should indicate clearly how precursor documents have been adopted or superseded.	A thorough gap analysis has been provided in Annex 1 of this report to explain stakeholders how the policy content was addressed. As mentioned above the replacement of the policy by the PfA happened years ago but not formalized.

Additional suggestions provided by stakeholders in the consultation are:

- We suggest that a change to the FSC Statutes is tabled to reinstate the explicit requirement for economic chamber members to seek certification of a significant part of their production forest within a reasonable time frame, as per the superseded FSC By-Laws.
- I believe we should have an element of growth of uptake of FSC certified products / production in the system, first and foremost for Chain of Custody members at this moment.
- If one of the motivations of PfA is to avoid green washing, we recommend that this is explicitly mention in the revised version.

Annex 1. Assessment of FSC-POL-20-002 Policy on Partial Certification of Large Ownerships (2000)

Section	Content/Text	Assessment	Conclusion
Introduction (p.3)	<p>Partial certification of large ownerships has been a controversial issue since the earliest discussions of 1993-4. These notes explain FSC's position regarding partial certification and compliance with Criterion 1.6 including the various rules currently applied, and proposes a more detailed interpretation, for inclusion in the FSC Guidelines for Certification Bodies (Section 2.13)</p> <p>The following revised interpretation is now open for comment...</p> <p>Motion: Approve the revision of Guidelines Section 2.13, following the interpretation in this document, subject to changes or consultations agreed.</p> <p>1 Rules for FSC Members 2 Rules for non-Members. 3 Guidelines for Certification Bodies 4 Interpretation 5 Conclusion</p>	<p>Reference to Criterion 1.6 (V4) is outdated as a new version of P&C (V5) was approved in 2012.</p> <p>The revised and current version FSC P&C V5 states: <i>1.8 The Organization* shall demonstrate a long-term commitment to adhere to the FSC Principles* and Criteria* in the Management Unit*, and to related FSC Policies and Standards. A statement of this commitment shall be contained in a publicly available*document made freely available.</i></p> <p>Therefore, FSC P&C (V5) continues to request The Organization to demonstrate commitment to P&C.</p>	<p>Commitment to FSC's mission and its Principles and Criteria remains in P&C V5.</p> <p>Structure and content of the policy not in line with <i>FSC-PRO-01-001 The Development and Revision of FSC Normative Documents.</i></p> <p>No risk in withdrawing FSC-POL-20-002 as intention is stated in another core FSC document.</p> <p>Moreover, withdrawal will contribute to streamlining the normative framework as POL-20-002 references outdated documents.</p>
Rules for FSC Members	Paragraph 29 All prospective members with economic interests must have	Rules for FSC members are laid out in a single document (FSC Statutes). It is not a	FSC members shall demonstrate commitment

Section	Content/Text	Assessment	Conclusion
(p.3)	demonstrated active commitment to implementing the FSC Principles and Criteria in their operations. It is expected that producers have a significant part of their production forests certified by an FSC accredited certification body or be certified within a reasonable time frame (normally this will not exceed two years).	<p>common practice to lay out rules for members and non-members across FSC policies.</p> <p>Reference to FSC By-Laws replaced by FSC Statutes. Timeframe of 2 years eliminated from Statutes. Intention of paragraph seems re-worded in FSC Statutes (2014):</p> <p><i>In the case of prospective members of the economic chamber, detailed documentation, describing the organization or individual's commercial activities, details of forest operations or sources, including a description of how active commitment to FSC and its Principles and Criteria is being, or will be, implemented, and, for organizations, the identity of directors, the parent company and other relevant commercial relationships. At the request of the prospective member, the Board may treat financial information from the prospective member as confidential</i></p>	<p>to FSC's mission in FSC Statutes.</p> <p>No risk in withdrawing POL-20-002 as the requirements for members as per the policy are invalidated and the intention is stated in another FSC core document.</p>
Rules for FSC Members (p.3)	Paragraph 30 To avoid the risk of admitting forest producers or forest product traders which have a small model operation meeting FSC requirements, while the rest of their operations are not acceptable, FSC must be satisfied that the	<p>This text is not found re-worded in the Statutes, it seems to have been replaced by paragraph in section 12:</p> <p><i>A statement of support for the application from two FSC Members in good standing; in</i></p>	<i>POL-01-004 Policy for Association of Organizations with FSC (PfA) introduced as safeguard to diminish risk of admitting forest</i>

Section	Content/Text	Assessment	Conclusion
	<p>entire operation will conform with FSC requirements within a reasonable time frame.</p> <p>Interpretation: Since 1994, this has been interpreted to mean that partial certification is permitted for FSC members and applicants for FSC membership, on condition that the organization has formally applied for certification assessments for its entire operation from an FSC CB, and has also formally committed itself to doing everything possible to achieve certification for its entire operation within a reasonable time frame.</p> <p>The time frame will not normally exceed two years. It was not fixed in absolute terms, because FSC recognised that two years may not be enough time for some very large and complex organizations, or for some small but poorly funded organizations (such as community forests).</p> <p>The commitment applies to the entire forestry or forest management operation owned or fully controlled by the entity applying for FSC membership.</p>	<p><i>the understanding that at least one letter should be from a member of the chamber to which the prospective member is applying to join, and preferably from the same sub-chamber.</i></p> <p>Timeframe for achieving FSC certification in the entire operations is not mentioned in other normative documents and regulation seems to have dropped out after FSC By-Laws disappeared.</p> <p>Moreover, timeframe of two years for a forest management company to apply to have all of its forest operations certified is confusing. Within the same document a clarification exists in criterion 2.1. (See Annex 1. FSC Guidelines for Certification Bodies, Part 2.)</p>	<p>companies conducting unacceptable activities.</p> <p>No risk in withdrawing POL-20-002 as the requirements for members as per the policy are invalidated and the intention is stated in another FSC core document.</p>
Rules for non-Members	Non-members who apply for certification of forests are not bound by the provisions of	Text refers to outdated P&C V4.	Intention to commit to FSC P&C remains in

Section	Content/Text	Assessment	Conclusion
(p.3-4)	<p>Para 29 of the by-laws. Therefore partial certification is permitted, without requiring a formal application or commitment by the owner or manager for certification for its entire operation.</p> <p>This requirement is less demanding than the requirement for FSC members. This less demanding requirement was believed to be justified because FSC members have substantial rights in the FSC system, including standing for the FSC Board of Directors, and therefore a greater commitment should be required from them than for other certificate holders.</p> <p>However, Criterion 1.6 applies "Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria." This commitment is required of the forest manager of any forest management unit (FMU) applying for certification, or holding an FSC-endorsed certificate. The P&C do not demand this commitment of the owner, but there is clearly a risk of confusion if the certificate is held (or applied for) in the name of the owner rather than the manager.</p>	<p>Certificate holders can decide to apply for FSC membership or not. Referring to rules for non-members is an outdated practice no longer in use within FSC normative documents.</p> <p>Moreover, PfA regulates commitment of the company in non-FSC certified areas.</p>	<p>criterion 1.8 of FSC P&C V5.</p> <p>PfA introduced as a safeguard to diminish risk of admitting forest companies conducting unacceptable activities. This commitment is materialized through the signature of FSC's trademark license agreement.</p>

Section	Content/Text	Assessment	Conclusion
	<p>The commitment should be demonstrated on any other FMU which is managed by the same forest manager, or where that forest manager has the main operational responsibility for management decisions and operations, even if the other FMUs have different ownerships.</p> <p>This guideline explains how assessors should also evaluate evidence of commitment in other FMUs, under the same ownership, but operated by different managers</p>		
<p>Guidelines for Certification Bodies*** (p.4)</p>	<p>The following Guidelines were finalised in June 1998, and form part of the contract between FSC and accredited Certification Bodies</p> <p>Subject 2.13 Partial certification of large ownerships. Updated: June 1998. (attached)</p>	<p>***This section includes the assessment of the entirety of content in Annex 1:</p> <p>POL-20-002 is silent on how a commitment to FSC P&C should be demonstrated by The Organization or evaluate by a certification body.</p> <p>Within the same document the term “whitewashing” seems to have been changed to “greenwashing”.</p> <p>It is not a common practice to include guidelines for certification bodies in FSC Policies.</p>	<p>POL-20-002 is redundant and some of the content outdated.</p> <p>Structure of POL-20-002 and particularly this section aimed at certification bodies is very different to current practices in FSC for developing normative documents as laid out in FSC-PRO-01-001.</p>

Section	Content/Text	Assessment	Conclusion
		Regulating activities outside of certified areas is not assessed by certification bodies (CBs). According to POL-01-004 it is FSC evaluating unacceptable activities.	
Interpretation (p.4-7)	FSC maintains its position on partial certification. Non-members of FSC may apply for certification for individual Forest Management Units. They are not obliged to apply for certification, or to commit themselves to certification of their entire set of management units, so long as each candidate for certification is a separate forest management unit. The board and membership of FSC endorsed this position when the current wording in the by-laws were endorsed in 1994, for reasons which are still valid.	The intention of POL-20-002 is to eliminate risks of whitewashing (certifying some areas while in other areas of responsibilities not adhering to FSC's mission). However, the intention or intent to regulate non-certified areas remains in the PfA.	FSC has in place policies to address the concern of greenwashing. Particularly through the PfA. Withdrawing POL-20-002 poses no risk to FSC system.
Interpretation (p.4-7)	<i>Criterion 1.6. This criterion is designed to ensure that the forest management under assessment represents a genuine long-term commitment on the part of the manager, rather than merely a plan on paper. Criterion 1.6 is evaluated in the activities, plans and commitments of the forest manager, or the person or team responsible for the management of the specific forest area proposed for certification. The manager may be, for example, a forestry official, a concession</i>	This section of the policy refers to an outdated criterion. The essence has changed as currently there is no timeframe for non-certified management units of the organizations to become FSC certified. Neither the PfA, nor other normative documents, have a timeframe in this regard.	Withdrawing POL-20-002 poses no risk to FSC system. References in this section are outdated or invalid.

Section	Content/Text	Assessment	Conclusion
	<p><i>holder, a private individual, or a committee representing a community or co-operative. The forest manager is not necessarily the government or government department which has responsibility for public forests, and not necessarily the private corporation or publicly owned company which owns the title to the forest, nor the individual shareholders in a company.</i></p> <p><i>This issue is covered by Guidelines 2.13 section 2.3.c, which describes the responsibility of the certification body in evaluating this commitment in forest lands not covered by certification. FSC does not yet have sufficient case history experience to be able to offer more detailed guidance about marginal cases. This issue should be considered on a case-by-case basis by certification bodies during their consultations.</i></p>		
<p>Interpretation (p.4-7)</p>	<p><i>There is a risk of whitewashing, which is recognised by Section 2.13 of the Guidelines to Certification Bodies. This risk is covered especially by para. 2.3 of Section 2.13, which requires the applicant for certification to inform the certification body about all forest areas over which the applicant has some responsibility, and describes the responsibilities of the</i></p>	<p>This concern is the essence/motivation of the PfA, even though it is not explicitly mentioned in the policy itself. In other words, the PfA does not speculate on whitewashing or greenwashing. However, FSC Statutes make explicit that economic chamber members are committed to its P&Cs.</p>	<p>FSC has in place policies to address the concern of greenwashing, particularly through the PfA.</p> <p>Withdrawing POL-20-002 poses no risk to FSC system.</p>

Section	Content/Text	Assessment	Conclusion
	<p><i>certification body. This section confirms that applications and evaluations for certification do NOT have to include all the forests over which the applicant has some degree of involvement. The integrity of FSC certification is also protected by controls over the use of FSC's trademarks, on and off product.</i></p>		
	<p><i>The following steps apply in these cases.</i></p> <ul style="list-style-type: none"> <i>What is to be certified: the management unit or the company?</i> 	<p>CBs need to verify compliance of the management unit according to the applicable standard. Other normative documents within FSC have clarified this. This note is unnecessary.</p>	<p>This section of POL-20-002 has been clarified throughout other FSC's normative documents. Withdrawing the policy poses no risk to FSC system.</p>
<p>Annex 1 (p.9)</p>	<p><i>a The applicant for certification must make a full disclosure of all forest areas over which the applicant has some responsibility, whether as owner (including share or partial ownership), manager, consultant or other responsibility. The disclosure shall be documented in the certification report.</i></p>	<p>This requirement regarding disclosure of all forest areas over which the applicant has ownership is also included in FSC-STD-20-007a:</p> <p><i>1.4 A full disclosure and brief description of any area of forest over which the certificate holder has some responsibility, whether as owner (including share or partial ownership), manager, consultant or other responsibility) which the certificate holder has chosen to exclude from the scope of the certificate, together with an explanation of the reason for its exclusion and description of the controls that are in place to prevent</i></p>	<p>This section of POL-20-002 is incorporated in FSC-STD-20-007a (V1-0). Withdrawing the policy poses no risk to FSC system.</p>

Section	Content/Text	Assessment	Conclusion
		<p><i>confusion being generated as to which activities or products are certified, and which are not. Compliance with FSC-POL-20-003 The excision of areas from the scope of certification shall be documented.</i></p>	
<p>Conclusion (p.7)</p>	<p><i>When a certification body, as a result of consultations, concludes that a management practice in another forest, owned by the same legal entity as the applicant for certification, constitutes, because of its magnitude and frequency, a clear indication of a lack of willingness or commitment to adhere to the FSC P&C, the certification body will establish whether that lack of commitment represents a major failure of Principle 1 which could affect the certification of the FMU under assessment.</i></p>	<p>According to POL-20-002 the responsibility of assessing commitment to FSC's P&C lies on the CBs. This is not in line with FSC's current normative framework and particularly with the PfA as this is the responsibility of FSC. Moreover, overseeing the implementation of the PfA is not conducted by CBs as this is now part of FSC's due diligence evaluation.</p>	<p>This section of POL-20-002 is not only outdated but also contradictory with the normative framework and what is laid out in POL-01-004. Withdrawing POL-20-002 will bring consistency and clarity to the normative framework.</p>