



# SYNOPSIS OF CONSULTATION COMMENTS

The first draft of FSC-STD-01-003, SLIMF and Community  
Forest Eligibility Criteria V2-0

8/08/2022



## FOREWORD

Amongst FSC's many standards, the SLIMF Eligibility Criteria V1-0, launched in 2004, has offered small-forest owners and low intensity managed operations the opportunity to benefit from streamlined certification procedures.

The concept of SLIMF became so popular that it was increasingly applied outside of its original scope in a variety of applications, such as for differentiated national indicator setting in Forest Stewardship Standards. This resulted in a widely unregulated use of the concept.

A review conducted by FSC in 2021, revealed the following opportunities for improvement:

1. Changing the scope to regulate the application of the SLIMF concept across the whole FSC system.
2. Introducing a local adaptation process for allowing flexibility at regional or national level.
3. Introducing the new concept of a 'community forest' to address the diverse range of user groups.

All these points have been addressed in this revised version and were presented for a 60-day public consultation from 14 April to 13 June 2022.

For further information related to the revision process, please visit the dedicated webpage [here](#).

For comments or questions related to the revision process, please contact Joachim Meier-Dörnberg, project lead, at [j.meier-doernberg@fsc.org](mailto:j.meier-doernberg@fsc.org).

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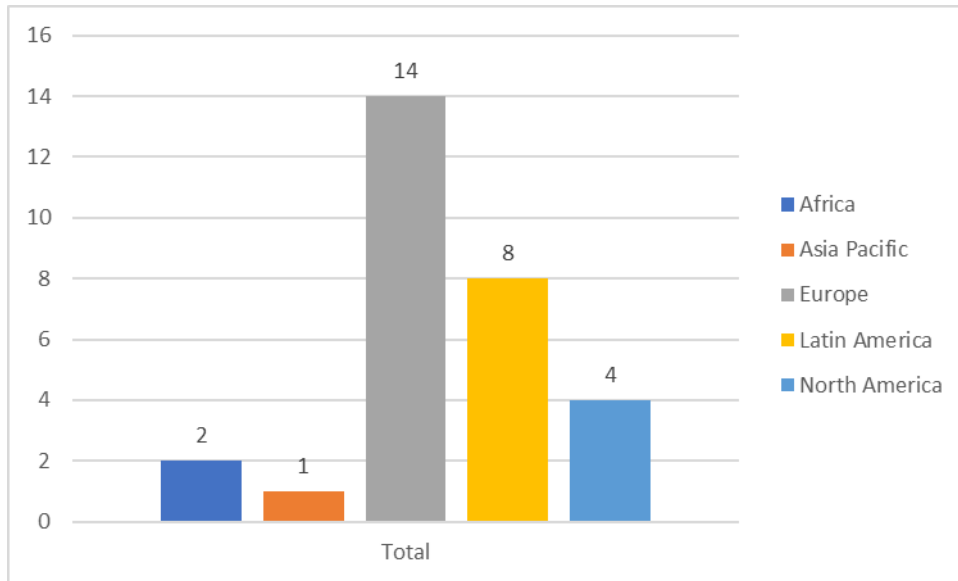
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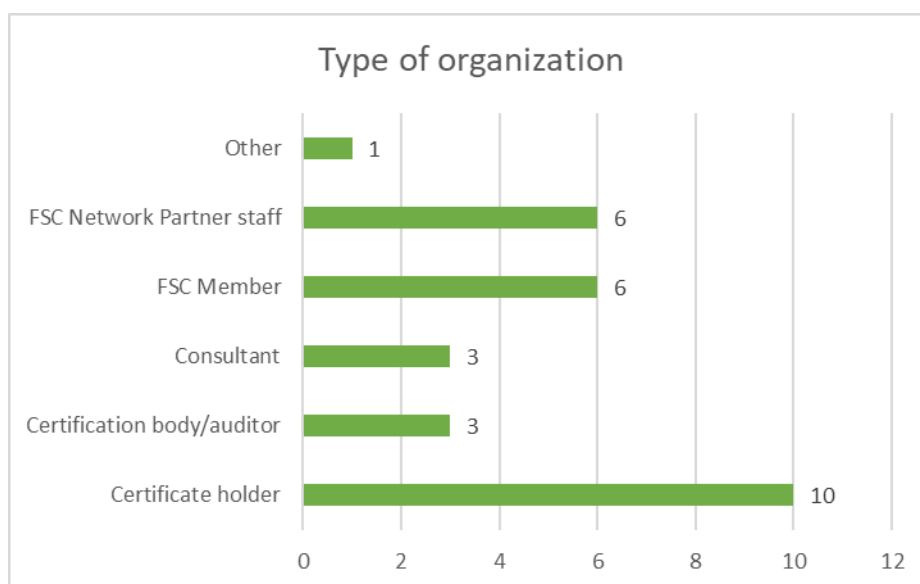
# PARTICIPATION IN THE FIRST PUBLIC CONSULTATION

29 stakeholders provided feedback to draft V1-0 in the first public consultation, representing:

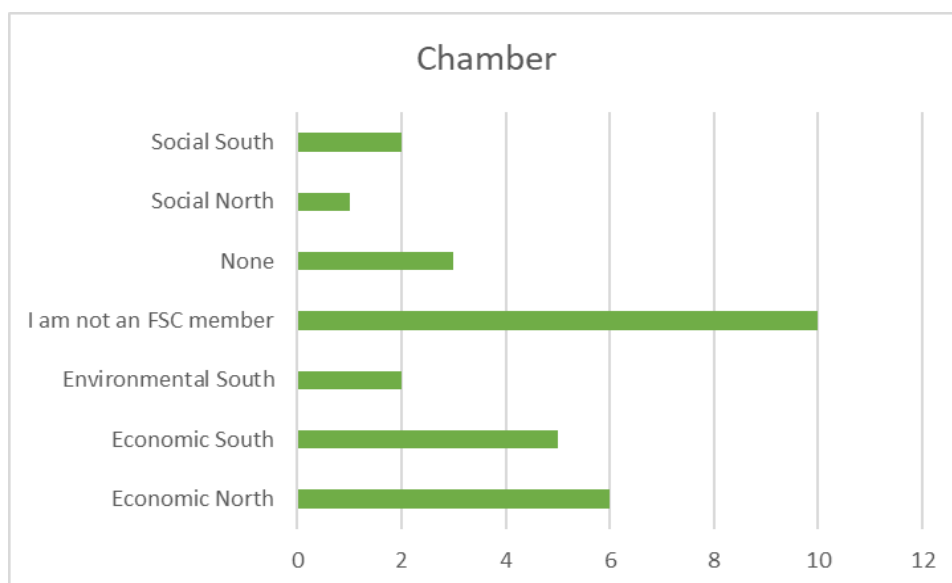
## 1. Region



## 2. Type of Organization



### 3. Chamber



### Methodology

In the first public consultation, topics were presented in one closed question which asked respondents to agree or disagree with the proposed solutions. If there was disagreement or the need for additional comments, the option was given to explain this position. The final question was open to add any comments beyond the targeted questions.

The FSC team conducted a quantitative and qualitative analysis per topic. The key messages were aggregated and compiled. In the section 'FSC's feedback', the position of FSC is relayed and justified, focusing on where commenters disagreed with the proposal's additional comments. Where feedback resulted into new text for the next version, this text is included in red under the FSC feedback column.

Other messages, including messages in support of the proposals, were discussed internally, and considered in the preparation of the second draft of the procedure.

## SUMMARY OF COMMENTS AND FSC FEEDBACK

The below summary is organized by questions asked. After presenting the quantitative results, the results are aggregated and organized by topic. How the feedback was considered and applied in the new draft (if applicable) is presented in the column titled "FSC's feedback".

Question 1a: Do you agree with the current SLIMF thresholds as a generic internationally applicable definition?

Yes	No
22	7

1b: If the answer is no, please explain.

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	1.2.1: it is suggested using 2 parameters, where for planted forest there is a differentiation between the parameter 1. 'area' of effective management and 2. 'total area' including preservation area, legal reserve, etc.	<p>In 1.2.2, this is already possible, referring to the national adaptation, where this specification needs to happen and now has been made more explicit to:</p> <p>NEW in draft V2.0: 4.1.1 For the purpose of defining 'small' in the regional or national context, standard developers may propose a different threshold and/or may change the reference from total area of the Management Unit to a part of a Management Unit (MU), e.g. production forest area.</p>
2.	<p>1.3.2: it is suggested to add that management units that collect non-timber and harvest wood can also be classified as SLIMF by the size criterion.</p> <p>Text suggestion: 1.3.2 Management Units may qualify as SLIMF when:</p>	Under this scenario, the MU is already SLIMF eligible based on size.

<p>only non-timber forest products (NTFPs) are collected or harvested, OR</p> <p>NTFPs are collected or harvested AND timber is harvested AND the harvesting rate meets the requirements of clause 1.3.1.</p> <p>NTFPs are collected or harvested AND timber is harvested AND the Management Units meets the requirements of clauses 1.2.1 and/or 1.2.2.</p>	<p>NEW: 1.3.3 NTFPs are collected or harvested AND timber is harvested AND the MU meets the eligibility criteria for small scale or low intensity as outlined in clauses 1.2 and 1.3.</p>
<p>3. The harvesting rate should not exist in special occasions caused for ex. by forest fires, acid rain, storms, floods (Calamity cuts).</p>	<p>This point is agreed and added to a paragraph under Section 4 (formerly 3). NEW:</p> <p>4.2.1 For the purpose of defining 'low intensity' in the regional or national context, standard developers may propose different parameters and/or thresholds in line with the following:</p> <p>a) Adaptation of the harvesting rate, using both parameters, MAI AND annual harvesting volume.</p> <p>b) Under specific management objectives, such as thinning for the purpose of forest restoration and/or in cases of natural hazards (e.g. drought, insects, blizzards, storms, forest fires, etc.), the MAI may be dropped and the annual harvesting volume may be adapted.</p>
<p>4. There needs to be clarified, whether existing adaptations of SLIMF in a national context (i.e., FSC-STD-01-003a) will be allowed to continue, or if these countries must start over and follow Part II of the revised standard.</p>	<p>The new rules should be more flexible than in the past, which is possible in the new STD-01-003. This needs to be applied on the country level, running through the regular standard development and revision process.</p> <p>The transition rules will be followed up within PSU and the respective program.</p>
<p>5. It is considered unnecessary to establish eligibility criteria for SLIMF; certification bodies (CBs) and auditors must ensure consistent evaluation of</p>	<p>The SLIMF concept is long standing, and members and stakeholders had agreed to it in 2004. SLIMF is needed for</p>

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the “solutions” to forest management certification, and must be able to interpret and conclude about the compliance with the FSC Principles and Criteria (P&C) according to the local context, considering the size, intensity, laws, benefits, relationship with the forest, labour conditions, forest type, forest products and services, etc. Depending on the circumstances, even a “SLIMF” must implement a kind of solution that may not be necessary for a non SLIMF.

synchronizing certification bodies and steering the same conclusions in different contexts. The clearer the standard, the better the auditing calibration and relationship between auditor and certificate holder. Interpretations are reduced by making the rules very clear.

All other elements on context specific attributes are being considered on national level.

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6. Areas managed only with the purpose of conservation and declaration of ecosystem services should also be considered as SLIMF.

Ecosystem Services *per se* are not SLIMF eligible. However, the low intensity regime in section 1.3 already covers conservation purposes.

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7. It is suggested to establish the 1.000 hectares threshold as a default MU size that can be considered SLIMF.

There is no evidence available to demonstrate a need to change from 100 to 1000 hectares for the international definition. For the national level, this adaptation is possible, as outlined in section 3.1.

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8. The definition of Small Producers must have threshold areas greater than the 100 hectares quoted as limiting in the international standard. For forests planted in tropical countries, the planting areas are larger due to the shorter cycle and lower volumes harvested per unit (tree), to achieve marketable productivity.

The national level adaptation will decide on this, which is possible under Part II.

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**Question 2a:** “Community Forest” is defined in this standard as a separate concept that does not fit within the definition of SLIMF. Do you agree that adding Community Forest increases the applicability and flexibility of this standard?

Yes	No
28	2

**2b:** If the answer is no, please explain.

Nr.	Stakeholder comment (aggregated)	FSC’s feedback
1.	In agreement with and support the addition of the Community Forest definition, separate from the SLIMF definition. This change will increase the applicability and flexibility of the FSC normative framework (not specifically this standard), BUT only if/when the other related standards and procedures are also adapted to use these terms (SLIMF and Community Forest) as they are defined here (or as adapted in a national context). Most importantly, the concept of "community forest" needs to be worked into the normative framework - i.e., when and where additional flexibility and accessibility will be allowed for these often low-intensity managed forests.	The application of the community forest concept needs to happen across the FSC normative framework and is to be included into the respective policies and standards.

**Question 3a:** Do you agree that a Community Forest is defined via Tenure and Management?

Yes	No
22	6

**3b:** If the answer is no, please explain.

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	<p>It is necessary to define the concept of community clearly, because perhaps within the international scenario there may be an incorrect interpretation of the criteria, classifying groups certified producers such as communities, since the groups carry out the management activities collectively under a same management plan sometimes.</p>	<p>SLIMF is not necessarily equal to Community Forest, it depends on the application, outside this standard.</p> <p>NEW: 2.2 Standard developers may <b>specify different definitions for tenure and management for their region or country AND/OR</b> develop additional criteria, following the adaptation process as described in Part II, <b>clause 5.1</b>.</p>
2.	<p>A) It is recommended that "management" considerations include not only who is implementing the management, but also for whose benefit the management is being implemented, i.e., consideration as to whether the management unit is being managed for benefits at a communal level (and not just financial benefits).</p> <p>B) The generic/default definition will work for some community forests in a specific country while for other contexts it might not. The lands that are e.g. managed by a Native American indigenous community (or the lands managed on their behalf by the Federal government) may include: a) lands that they own fee simple, b) lands that are held in trust for them by the federal government, and/or c) lands that were allotted to individuals early in the colonization of the country and are now owned via fee simple, or via usufruct title (i.e., held in trust by the federal government). Lands with these different types of "tenure" may be managed together as a single management unit that provides benefit to the entire community.</p>	<p>The national adaptation already considers this.</p> <p>This is included in the international definition already, however, the details can be added for national adaptation in addition to the box 1. with possible additional elements.</p>
3.	<p>The basic idea behind categorizing MUs to SLIMF is to allow lighter requirements based on the small size of MU or its light management, i.e., decreased risk for large-scale damage. This same principle should also apply to Community Forests, which is now not happening by defining Community</p>	<p>The assumption of SLIMF being equal to Community Forest is incorrect and the application can vary and is defined in the respective normative framework documents. Variation of definition needs to happen on national level.</p>

Forests through tenure and management responsibility only. In order to secure a level playing field between SLIMF MUs and Community Forest MUs, Community Forests should also include criteria contributing to decreased risk for large-scale damage, i.e., criteria related to the size and management intensity of the Community Forest MU.

NEW: Box 1. Additional elements were added:

- Scale of area
- Intensity of timber harvesting

4. The meaning of "individually assigned plots" needs to be outlined.

It is the opposite of a communal setting with collectively owned plots.

Question 4a. Do you agree in general with the adaptation option for standard developers?

Yes	No
24	3

4b: If the answer is no, please explain.

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	Requirement for justifications alongside with stakeholder support for adapted threshold below 1.000 hectares should be considered. Relying only on stakeholder comments might cause a biased outcome in defining the threshold. Thus, a justification built around for example the average size of forest ownership in the country or the size at which forestry can be practiced as a main occupation could lead to a more realistic outcome on what is considered "small" in the national context.	The requirement can always be built in addition at national level, to make it more rigid. – Most stakeholders are in support with the current proposal. The Technical Working Group prefers to keep the current proposal.

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|--|---|
| 2. The English version says that stakeholder support is needed, while the Spanish version says that support from 'social actors' is needed. So, the first thing is to align from whom support is required. | Accepted and changed to 'actores interesadas' in the Spanish version. |
|--|---|

**Question 5a:** If the adaptation exceeds 1.000 hectares threshold, do you agree with requiring strong justification in addition to demonstrated stakeholder support?

Yes	No
22	5

**5b:** If the answer is no, please explain.

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	The intent of this standard is to allow for flexibility in national contexts when the arbitrary threshold (100 ha) does not make sense. Why establish yet another arbitrary threshold? If there is cross-chamber stakeholder support for a threshold >1000 ha, then this should be allowed.	<p>This point was agreed by the Technical Working Group and the proposal now is:</p> <p><b>NEW:</b></p> <p><b>3. General requirements</b></p> <p><b>3.1 All adaptation proposals from the international default on 'small', 'low intensity' and 'community forest' require justification and demonstrated stakeholder support.</b></p> <p><b>NOTE: Once defined and justified by standard developers, the Performance and Standards Unit (PSU) and the Policy and Standards Committee (PSC) analyse and decide upon the adaptation proposals within the process of Forest Stewardship Standard (FSS) development.</b></p>

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2. What is the interpretation of "strong" in "...strong justification...". To facilitate SDG understanding and avoid NFSS being sent back after stakeholders have spent a lot of resources to develop, give examples of what FSC would validate as strong justification.
- The proposal has been changed. (See comment above under new section 3.)
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**Question 6a:** Do you agree with the option to drop the mean annual increment (MAI) under specific management options?

Yes	No
24	2

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**6b:** If the answer is no, please explain.

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	Again, there are differences in the English and Spanish version. The English says MAI can be dropped and the Spanish says that it can be reduced. Which is the correct?	Correct is the English version, which states 'dropped'. The translated version will be corrected in draft V2-0.

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**Question 7a:** NTFPs are already in the scope of SLIMF under the international definition, without specifying volumes or thresholds. Can you therefore agree to exclude NTFPs from the option for further adaptation?

Yes	No
20	6

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7b: If the answer is no, please explain.

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	It is not possible to answer this question, as the intent of Clause 1.3.2 is not clear. Is the intent of the Clause to say that if only NTFP are collected/harvested, then the management unit may be automatically considered SLIMF without consideration of thresholds provided in Clause 1.2 or Clause 1.3.1; whereas if NTFP and timber are harvested, then the thresholds in Clause 1.3.1 apply? OR is the intent of the Clause to say that the thresholds of Clause 1.3.1 apply to the NTFP if only NTFP are harvested, but the thresholds apply to the timber if both NTFP and timber are harvested?	This comment has become obsolete, as the new proposal states: NEW 1.3.3 Management Units may qualify as SLIMF when: a) only non-timber forest products (NTFPs) are collected or harvested, OR b) NTFPs are collected or harvested AND timber is harvested AND the Management Unit meets the eligibility criteria for 'small' or 'low intensity' as outlined in clauses 1.2 and 1.3.
2.	Although the international definition does not specify volumes or thresholds, there should be an option to do so at the national or regional level if a particularly high level of NTFP harvest would NOT be considered SLIMF.	The National Forest Stewardship Standards/ Interim National Standards with NTFP indicators and requirements deal with the levels of harvest. There is no need then to specify any thresholds here.  Stakeholders broadly agree to our proposal. The TWG doesn't not see the need to change and sticks to the current proposal.

Question 8a: Do you agree with the adaptation option for Community Forest including the examples of additional elements given in the Box?

Yes	No
21	5

8b: If the answer is no, please explain.

Nr.	Stakeholder comment (aggregated)	FSC's feedback
	<p>1. With the current Community Forest Eligibility Criteria, we cannot agree with the adaptation option based on elements in Box 1. This is since the current eligibility criteria lack criteria related to the size and management intensity of Community Forests (please see our responses to 3a and 3b). - In case size and management intensity related criteria will be added to Community Forest Eligibility Criteria, Box 1 elements can be justified and adopted.</p>	<p>NEW: Box 1. Additional elements were added: Examples <b>may</b> include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• <b>Scale of area</b></li> <li>• <b>Intensity of timber harvesting</b></li> </ul>
	<p>2. The title of Box 1 needs editing, so that these are examples only, and that they are specifically for national adaptation of the community forest definition, and it needs to be stated that this box is not normative (to align with the "Scope"). Suggestion for revised title: "Examples of potential additional elements that may be considered when developing national adaptations for the definition of "Community Forest."</p>	<p>Agreed by the TWG. NEW: Box 1: <b>Examples for additional elements that may be considered when developing adaptations for the definition of 'community forest'</b>.  <b>These elements may</b> include, but are not limited to:</p>

Question 9: What else would you like to tell us?

Nr.	Stakeholder comment (aggregated)	FSC's feedback
	<p>1. Despite the addition of the new category of community forests, this is still a succinct, simple and straightforward standard. This makes it quite unusual in the FSC system, and the team who have worked on it should be congratulated! We</p>	<p>This overall challenge is being taken up by PSU for internal discussion and alignment with relevant revision processes, such as the mentioned revision of 60s series, which regulate national standard setting.</p>

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note that one of the reasons for this standard being relatively straightforward is that the detail of national or regional adaptation processes will be addressed through the 60-series revision. It is probably not even feasible to include a note to this effect in the standard, as we do not yet know what the outcome of the 60-series revision will be, even in terms of the number and names of documents. But it might be useful to communicate this situation clearly to stakeholders in any news stories announcing the new version of FSC-STD-01-003. Finally, while we agree with the provisions for adaptation, we do have concerns about how 'demonstrated stakeholder support' will be interpreted in practice; could this be achieved through support from only one chamber, for instance? (We note that the current standard refers to 'broad support'.)

Collected ideas by the TWG so far for what demonstrated stakeholder support can entail:

- Records/minutes with a certain level of detail on representation of participants (e.g by chamber system)
- No strong objections to the proposal by standard setting entities

Means/stakeholder groups to gather the support, e.g.:

Culturally appropriate stakeholder workshops and/or consultations, participatory approaches:

- Smallholders and communities
- CBs
- Scientific organizations
- Governmental organizations

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2. It is obvious that the definition of "small" varies widely between regions e.g., North America, Europe and most of the Global South. National adaptation should not be used to favour one region over another, in other words a small operation should have an upper limit, so the term is not abused.

More flexibility is granted now, to be as context specific as possible. Justification and demonstrated broad stakeholder support are required to avoid unacceptable deviation. The TWG agrees to the current concept.

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3. Firstly, we would like to emphasize our support for the general direction of the revisions of this standard, with increased flexibility for adaptation to national contexts, and inclusion of a formal definition (and potential for national adaptation) for Community Forest.

Accepted.

- ✓ We recommend that the Introduction be reviewed and revised by a native English speaker - the sentence structure is at times confusing and difficult.
- ✓ In the "Objective" and anywhere else in the normative framework where used, we recommend shifting to "Small and/or low intensity managed forest" or to "Small or low intensity

Agreed (FSC to run a language check in V2-0)

Correction:

The objective of this standard is to provide the generic international concept of 'small **or** low intensity managed forest'



<p>managed forest" to ensure understanding that the management unit does not have to be both small and low intensively managed.</p> <ul style="list-style-type: none"> <li>✓ For Clause 1.3.1 and Clause 2.1.2.1, recommend changing the formatting of options to clarify that there are two required elements, with the second element having two options for conformance. As presented (a, b, c), there is the potential for confusion as to how the "AND" and "OR" related to the three elements.</li> <li>✓ How is "legal responsibility" defined in Clause 2.1.2.1(a), and how is it different from having the legal tenure (per Clause 2.1.1)?</li> </ul>	<p>1.3.1 TWG opts to keep the current format.</p> <p>NEW:</p> <p>2.1.2.1. b: ...<b>EITHER</b> performs the <b>forest</b> operations, OR,...</p> <p>- However, the format will be kept.</p> <p>For 2.1.2.1 you do not be the legal owner of the MU, but legal responsibilities may be addressed through a contract.</p>
<p>4. Adaptation of the harvesting rate, using both parameters, MAI AND annual harvesting volume. This point could be MAI OR annual harvesting volume in some cases that requires clear justification.</p>	<p>Agreed:</p> <p>NEW 4.2.1</p> <p>b) Under specific management objectives, such as thinning for the purpose of forest restoration <b>and/or in cases of natural hazards (e.g. drought, insects, blizzards, storms, forest fires, etc.)</b>, the MAI <b>may</b> be dropped and the annual harvesting volume may be adapted.</p>
<p>5. Was there a need for updating the SLIMF eligibility criteria?</p>	<p>Stakeholder support was clearly demonstrated during the review of FSC-STD-01-003 and the BoD approved the revision.</p>
<p>6. It is important to make sure that it is consistent with the FSC normative framework. This criterion is now defining community forests but also giving the possibility for national adaptation. That is not consistent with the "FSC Terms and definitions". Also, the group standard will need to adapt by removing references to ha/sizes and instead using the SLIMF (defined nationally). Also, it is important to add to 60-series that the national SLIMF size/criteria needs to be written in the NFSS. And in 20-007 the SLIMF is referred to the NFSS. So, it is important to really look into where these changes may affect other standards and procedures. Also, how does the new SLIMF criteria relate to scale</p>	<p>Alignment needs are understood and agreed upon as necessary follow up at FSC PSU, also stated in comment 1. above.</p>

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intensity and risk (SIR). Maybe there is some guidance required regarding all these concepts: SIR, smallholders, SLIMF, community forests.

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7. Regarding the possibility to drop the mean annual increment (MAI) under specific management options, I agree that it can be good, but it needs to be assured and very well established at national level the situations in which this is possible. The problem is that sometimes the situations are very particular and to contemplate them the possibilities can tend to be very wide. It's necessary to guarantee at national level that these exceptions are very well defined.

Agreed, but there is a solid process behind dropping the MAI and the safeguards to show evidence are required.

Also, this new note refers to:

NEW: **3. General requirements:**

**NOTE: Once defined and justified by standard developers, the Performance and Standards Unit (PSU) and the Policy and Standards Committee (PSC) analyse and decide upon the adaptation proposals within the process of Forest Stewardship Standard (FSS) development.**

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8. In the scope section, it should be added that CBs use this standard to determine eligibility of MUs to qualify as SLIMF or Community Forest. There may be the case where standard developers don't develop specific guidelines and the default is this standard. If the requirement is for standard developers to always determine how this is applied, that should be clarified in the standard. Currently, this seems optional.

This issue is being addressed in FSC-STD-20-007, not in FSC-STD-01-003.

This standard is intentionally 'purpose-free'. The application is being addressed in either 60s series or FSC-STD-20-007 revision (such as streamlined auditing procedures).

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9. 1.3 – Harvest rates of 20% of the total average annual increment are very low for plantation standards in tropical areas. Since the areas have an annual increment higher than the temperate locations when evaluating the planted area, in this way the volumes harvested end up being larger per area. The volumes harvested do not reflect the sizes of the companies, but the areas in which they have in their scope.

The option for national adaptation is included and addresses this concern.

1.3.2 – When we talk about NTFPs, we must think about not only natural areas, but also plantation areas. In several areas with plantations in both large and small areas, there are possibilities of intercropping between wood production and NTFPs. Once these non-timber forest products could be certified, regardless of the size of the forest or the

The option for national adaptation also applies here.

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wood producer, this would add a lot to the forestry sector and its conservation potential, since most NTFPs producers are not the forest owners in the case of associations with plantations defined.

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## ABBREVIATIONS

<b>BoD</b>	Board of Directors
<b>FSC</b>	Forest Stewardship Council
<b>INS</b>	Interim National Standard
<b>MAI</b>	Mean annual increment
<b>MU</b>	Management Unit
<b>NF</b>	Normative Framework
<b>NFSS</b>	National Forest Stewardship Standard
<b>NTFP</b>	Non-timber forest product
<b>PSC</b>	Policy and Standards Committee
<b>PSU</b>	Performance and Standards Unit
<b>SLIMF</b>	Small and low intensity managed forest
<b>TWG</b>	Technical Working Group



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