



SYNOPSIS OF CONSULTATION COMMENTS

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

22/12/2022



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 revision:

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 19 September to 18 November 2022.

Changes made to D1-0 were:

1. The introduction of the option to introduce a scale threshold for management units with management of NTFPs on national level.
2. Separation of the clause for adapting the harvesting intensity of the MAI and/or the annual harvesting volume based on an incidental or planned scenario on national level into two clauses.
3. Editorial changes, improving the quality and consistency of the document.

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 the Community & Family Forest Program at communityfamilyforests@fsc.org.

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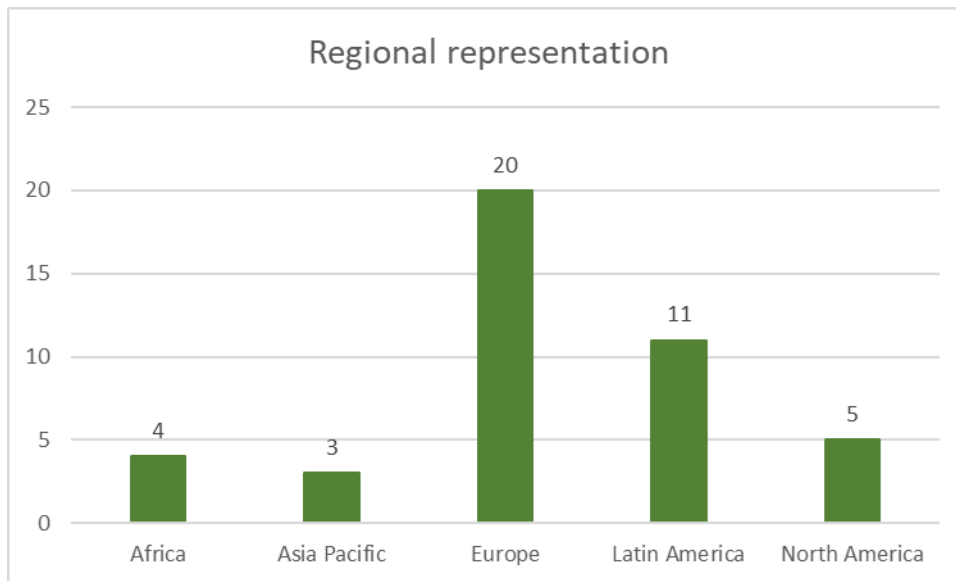
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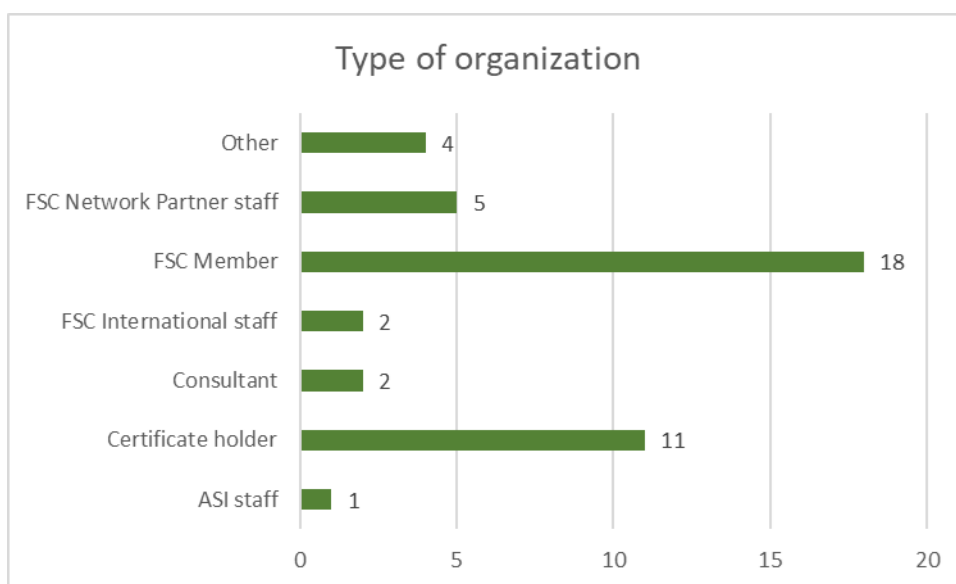
PARTICIPATION IN THE FIRST PUBLIC CONSULTATION

43 stakeholders provided feedback to draft V2-0 in the first public consultation, representing:

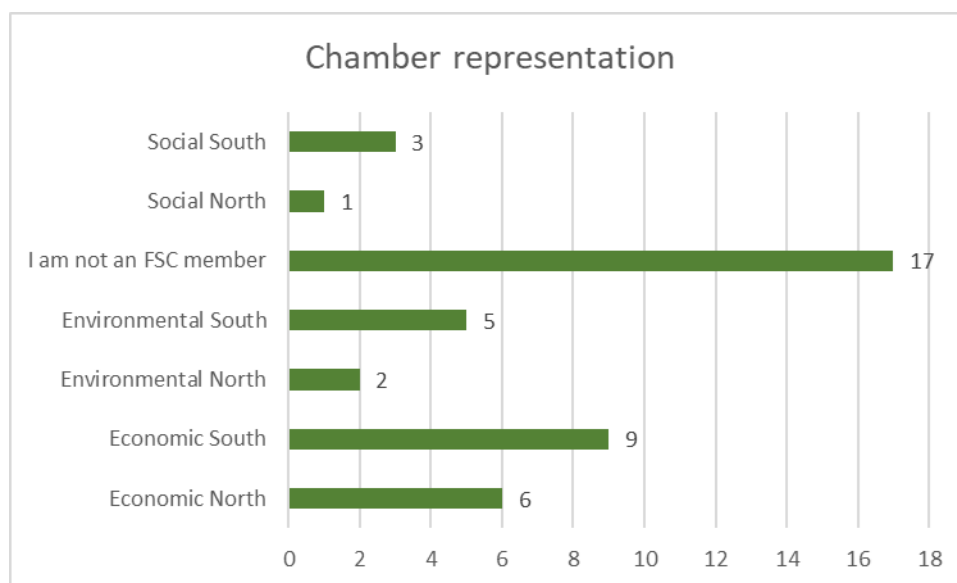
1. Region



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: Is it clear, the way the current introduction to the standard outlines the background, context and purpose for this revision?

Yes	No
38	5

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

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	Why add the Introducing of local adaptation process for allowing flexibility at regional or national level, when the concept of SIR will be included in the NATIONAL FOREST STEWARDSHIP STANDARD OF CANADA for Small-Scale, Low Intensity and Community Forests?	SLIMF definition and thresholds are usually the baseline to apply the scale, intensity and risk (SIR) concept to create specific indicators on national level, so, the two concepts are complementary.
2.	There needs to be a mapping, in this standard, of where the SLIMF concept is used across the normative framework and why for. If we don't have this, we can't begin to grasp what are the potential implications of the definitions and their national/regional adaptations.	It's not in the scope of this standard to decide the possible impacts. Application of this standard will be defined in the respective standards within the normative framework documents themselves. We do not imply the applications here. The potential impacts were analysed prior to the revision however, this was a background activity.

- | | |
|---|---|
| 3. I just have one question: regarding the 'opportunities for improvement', is point 2. something new? or a possibility being revised? I think it's a revision but might be wrong. | Agreed, changed from 'improvements' to 'revision'. |
| 4. I would only suggest some minor editing in the second paragraph to better align with the current terminology: "(...) have offered small-scale and low intensity forest operations the opportunity (...)". Similarly, in the last paragraph, last sentence: "The proposed changes enable a more equitable access to FSC requirements for all user groups, provide additional clarity in the relevant requirements and ensure better adaptability to a given geographical and socio-economic conditions. | Changes have been made to the document in accordance with the commented proposal. |

Question 2a: Is the objective of the standard clear?

Yes	No
35	3

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

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	The use of 'generic international concept' felt for a me a bit confusing due to the IGI. Is this on purpose? otherwise, I would suggest using other words.	The proposal was taken up and 'generic' was substituted by 'universal'.
2.	It is not clear whether the goal is to simplify or further restrict the SLIMF rule. It is mentioned as a justification for these changes that in some period the eligibility criteria were misused but it is not stated in what proportion of the total.	The issue was analysed during the review period. An exact proportion of the misuse of SLIMF is not relevant.

- | | |
|---|---|
| <p>3. I consider it is absolutely unnecessary to establish eligibility criteria for SLIMF; CBs and auditors must ensure consistent evaluation of the “solutions” to forest management certification and must be able to interpret and conclude about the compliance with the P&C accordingly the local context, taking into account 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 solution that may not be necessary for a non SLIMF.</p> | <p>SLIMF is widely agreed concept, approved by the membership for long. The public consultation on the review proposal prior to the revision phase underlined the need to define SLIMF for systemwide application as differential to large scale forest operations.</p> |
|---|---|

Question 3a: Is the scope of the standard clear?

Yes	No
35	3

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

Nr.	Stakeholder comment (aggregated)	FSC’s feedback
1.	How can standards developers have a meaningful and relevant work of adaptation without understanding the breath of impact it could have? Plus, there is absolutely no articulation with SIR outlined in the P&C => not that this would need to be described in this document, but we need to understand the connection (is it complementary? competing? totally different, nothing to compare?)	The TWG has taken the decision to not discuss any possible applications throughout the FSC normative framework. In so far, this question is not in scope of the standard and will need to be answered in the respective related FSC normative documents.
2.	Shouldn’t certification bodies be included in the second bullet point; in case they are in charge of developing INS?	Collectively, standard development groups and certification bodies are referred to as ‘Standard Developers’.

(See also GUI 60 002 V1 0 EN, Guideline for Standard Developers for addressing risk of unacceptable activities regarding scale and intensity FSC.)

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

Yes	No
32	7

4b: Is it clear under which conditions NTFPs are collected or harvested in combination with timber or without and qualify as SLIMF?

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	What about intensive plantations of NTFP, like rubber for example? is this really low intensity? I don't agree that it should be considered in that way. Plus, a note: you shouldn't only ask if the text is "clear" but also if we agree with it!	Agreed for the national adaptation option: New: 4.2.2: To qualify as SLIMF, standard developers may adapt the international eligibility criteria for a management unit with management of NTFPs by defining a scale threshold.
2.	I think it shouldn't mix NTFP with timber. Maybe doing 1.3.3 only regarding NTFP including a clause that both are applicable at the same time would be less confusing.	The TWG sees it as relevant to point out the two scenarios explicitly, one with and one without timber harvesting.

3. Not clear if the rate of harvesting is less than 20% of MAI for community forest. Because even the harvesting all trees in part of farmer members is not significant for area forest management, because to small part area and also, they still planting again for the next assets. 1.3.1.3, not clear if the limit total production less than 5.000 m³/year during certification cycle. For certification budget (activities and certification paid) need more benefits/profit for this, if the community forest only produces Albizia trees, the limit too low for get profit for certification activities.

The harvesting thresholds can be adapted on national level already for SLIMF.

1.3.1.3 is specific as it says:

c) the average annual harvest from the total production forest is less than 5,000 m³/year during the certification cycle.

Within community forest, the MAI can be added to the criteria how to define community forest in a national context.

4. In the 1.3.3, clause 1. "only non-..." I suggest to change in 1. only ecosystem service and/or non-timber forest products (NTFP) are collected or harvested So that FSC ES verified forests only producing and selling ES can quickly be classify as SLIMFS.

Adding ES now to the scope would need another round of consultation, which is not viable anymore.

Also, ES is an add-on to FM certification. It doesn't affect the status of eligibility of SLIMF. If no timber is harvested, this would fall immediately under the low intensity rule.

5. At a technical level, we believe that the reference to 'small' is out of place in sub-clause 1.3.3(b). Clause 1.3.3 is about the circumstances in which a management unit may be considered 'low intensity managed' and therefore SLIMF. In this context, whether or not it is small is irrelevant. If it was small, it would already be SLIMF as per clause 1.2.1.

This is agreed; 'small' has been taken out.

We also suggest that the interpretation of section 1.3 would be clearer if clause 1.3.1 referred explicitly to the rate of harvest of timber. As a point of principle, we do have issues with the fact that management units from which only NTFPs are harvested may automatically be considered SLIMF; we suggest that many stakeholders would not consider all rubber plantations to be 'low intensity managed', for example.

Agreed for the national adaptation option:

New:

4.2.2: To qualify as SLIMF, standard developers may adapt the international eligibility criteria for a Management Unit with management of NTFP by defining a scale threshold.

6. It is important to put a context of figures regarding the increase or decrease of SLIMF certified surfaces since 2004. It is very important to know the number before making changes

Data analysis has been part of the review prior to the revision.

7. The conditions are clear, but I'm not sure why 1.3.1 is not written as: "Management Units may qualify as 'low intensity managed' when: "

This is agreed; 'small' has been taken out.

Question 5a: Do you agree that standard developers may also adapt the reference area from total area of the Management Unit to parts of the Management Unit, e.g., production forest area?

Yes	No
27	11

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

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	I'm concerned that the option of defining SLIMF by a proportion of the MU is introducing an additional layer of complexity (not only flexibility) because we don't understand what impact it could have on other normative documents. Plus, is it really a widely relevant option? or are we just here introducing a specification for an anecdotic case?	The TWG understands that there are scenarios which justify the change of reference area to differ from the total area of the management unit and still to qualify as SLIMF, which needs to be considered for the national level adaptation. The safeguards to deviate from the international requirement must run through the approval process of FSC, which is minimizing any related potential risk.

2. I do not agree with this option as it would enable large operations to start calling themselves SLIMFs. In any case in some circumstances set asides are required which are not for commercial exploitation.

See answer above to comment Nr.1.

3. This would allow for too much unnecessary flexibility for local adaptations that might lead to large scale high intensity forest management enterprises to be able to meet adapted requirements if their FMUs are cleverly segmented according to the new thresholds.

See answer above to comment Nr.1.

4. Allowing for regional adaptation and the actual parts of the MU that are working forest is critical. I fully agree.

Question 6a: Do you agree with the additional option to drop the mean annual increment (MAI) due to the impact of natural hazards and/or forest restoration/sanitary cut requirements?

Yes	No
26	8

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

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	It's confusing. MAI parameter should be an essential characteristic for SLIMF, because it talks about production only which can be less or more.	There can be circumstances which could allow the dropping of MAI on national level, for restoration reasons by intense sanitary cuts.

<p>is less you are holding the SLIMF to produce more and if is more it can lose the SLIMF status, so I would rethink this.</p>	<p>However, this needs to be justified and run through the default approval process at FSC International.</p>
<p>2. The wording is wrong: natural hazards are not "specific management objective", they are hazards! what we should say is something like "a temporal increase of harvesting volume due to natural hazards does not constitute a change in the SLIMF status" this must be clear that this is a temporal situation.</p>	<p>Agreed: the new version has two separate clauses to one incidental and one planned scenario.</p> <p>4.2.1:</p> <ul style="list-style-type: none"> b. Under specific management objectives, such as forest operations for the purpose of restoration, the MAI parameter may be dropped, and the annual harvesting volume parameter may be adapted. c. In case of temporary incidents, such as natural hazards (e.g., drought, insects, blizzards, storms, forest fires, etc.), the MAI parameter may be dropped, and the annual harvesting volume parameter may be adapted.
<p>But then I wonder about the rationale for this. harvesting areas impacted by natural hazards may lead to high impacts - do we really want to consider this as low intensity? I've not fixed idea about this but without clear rationale this is hard to understand what your aim is here?</p>	<p>The rationale is for SLIMFs to not lose their eligibility based on natural hazards.</p>
<p>3. The proposed wording is confusing. It opens for unsustainable felling intensities being applied or deforestation disguised as restoration being carried out under the pretext of applying sanitation treatments or alike.</p>	<p>Management objectives are described in the management plan under P5 and P7, so, this cannot happen undetected, unnoticed and would cause immediate consequences through certification body audits.</p>
<p>4. This standard for "Low Intensity" is not fair if they are connecting with impact of natural hazard. Mostly the impact of natural hazard come from Large not Low.</p>	<p>The intention is to take natural hazards into account and still to stay SLIMF eligible.</p>

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5. Mean Annual Increment, MAI, should not be used as a guide to determine a low intensity harvest, as this will not be applied annually for planted forests. We understand that limiting a volume to be collected is important for natural forests around the world, but for plantations, where it takes years to be able to harvest and finally profit from the forest. In this way, the MAI can be removed from the low-impact definitions and not only in natural cases, in which a planted forest has a serious natural intensity.
- The concept of MAI has been introduced already in 2004 and has worked well so far.
- The issue can be handled for plantations on national level and any adaptation of MAI can be justified, if reaching necessary stakeholder support. This is an option, not an obligation per international definition.
-
6. But this needs to be considered for plantations as well. – In terms of the requirement of not allowing more than 20% of MAI to be harvested annually, this just does not make sense for plantations. One plant and grow a plantation with the specific objective to harvest the annual increment. If not, there is no point in establishing the plantation and what would ultimately happen to the volume of timber that is not allowed to be harvested in terms of the 20% rule. I would think that for plantations a size (ha) and/or total annual volume produced should be defined and not MAI.
- The MAI can be adapted to national context, once justified and approved by FSC International. This is a new flexibility of this standard, which did not exist before.
-
7. This is unnecessary flexibility to be given to local adaptation and would lead to integrity risks. Indeed, although operations for the purpose of restoration might have good intentions, they can still end up being high intensity operations that generate risks on all aspects of the FSC standard (workers' rights, health and safety, cultural HCV protection, etc) and should not have lesser requirements to achieve. The same goes for natural hazards. Operations addressing natural hazards are already identified has an integrity risk in several regions of the FSC system because their justifications are difficult to evaluate during audits after harvest in many cases (fraud scenario: CHs over harvesting under the guise of unnecessary sanitary cutting). Moreover, those operations are normally quite intense and generate integrity risks on all aspects of the FSC standard (workers' rights, health and safety, cultural HCV protection, etc) and should not have lesser requirements to achieve. If those operations end up raising the MAI above 20%, the full standard should be applied.
- The whole idea of SLIMF being based on scale and intensity is to bring the opportunity for differentiated treatment within the system one or the other way (e.g. auditing or indicator differentiation), which needs to be outlined in the respective normative framework documents, such as FSC-STD-20-007 or the 60s series.
- Additionally, SLIMF is a well-established concept, which FSC is now further contextualizing. Bringing this flexibility to the ground to include the wide variety of scenarios and target users under FM certification is a vital part of the FSC Global Strategy.
- The TWG trusts the due diligence process of approval of NFSS/INS by FSC International.
-

Question 7a: When adapting the community forest definition at regional or national level, do you agree to leave scale and intensity optional (see Box 1), versus making these parameters mandatory?

Yes	No
27	8

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

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	Interesting that the criteria of "technical capacity" is not listed. It seems to me that it is a key aspect of the rationale for the CIP isn't it?	Agreed. Added to the box.
2.	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 Forests through tenure and management responsibility only. Therefore, both the community forest definition and the option to adapt it should both include mandatory requirements for scale and intensity. - This is a question of equity and impartiality between different kind of certificate holders in the FSC system. MUs should qualify as SLIMFs only based on the decreased risk of large-scale damage, not based on forest management scheme or ownership. Not including criteria related to the size and management intensity of the Community Forest MU gives an impression that FSC considers Community Forest management being small-scale and low-intensity by default.	There are too many diverse situations globally to be more specific and limiting on international level, so, the opportunity to further define a community forest context specific needs to be given on national level. The definition builds on the current definition in the glossary of terms which was developed in a multiyear long stakeholder process and had been agreed upon.
3.	This may give too much latitude to go beyond the intentional of SLIMFs and allow larger operations to take advantage of the more flexible conditions.	See answer above to comment Nr.2.
4.	Scale and intensity are essential to this concept, should be mandatory indeed.	See answer above to comment Nr.2.

5. The way of referring to the area parameter was not clear to me ('scale of area'). Maybe there is another way to refer to this? I didn't understand the purpose until I read this question.

We are referring to 'scale' throughout the standard, so, this should be clear. However, and for consistency reasons, it now has been reduced to 'scale', leaving out the 'area'.

6. If community forests are to have the same normative flexibility as SLIMF (not clear from the draft), it should be defined at the international level without much flexibility. Indeed, it would represent a smaller burden of the FSC normative approval system than to have to process all the local adaptation requests. Moreover, it would allow for better calibration and simpler implementation of the system. It would also likely enable a fairer system (everyone under the same definitions).

There are too many diverse situations globally to be more specific and limiting on international level, so, the opportunity to further define a community forest context specific needs to be given on national level.

Finally, there is the risk of letting local powerful group of interests establishing thresholds that would allow, in some regions, for large scale or high intensity operations to be considered as community forests. As mentioned above, it should be clearer on if community forests are included as part the flexibility allowed for SLIMF or not. If it is not, it should be much clearer on what would be the flexibility allowed in terms of normative requirements for community forests. Again, I would recommend no to let these thresholds to be set locally for the same reasons as mentioned above.

Now, the flexibility of community forest is understood as how it will be applied throughout the system (auditing and national standard indicators). The intention of this standard is not to define but rather set the frame for application in the respective FSC normative framework documents.

Question 8a: What else would you like to tell us?

Nr.	Stakeholder comment (aggregated)	FSC's feedback
1.	The definition of community forest should be simplified to tenure and type of management.	This is the case on international level. It may but does not have to be adapted on the national level.

2. You've tried to make a very simple document and a very simple consultation, but the impact of it is far more reaching than what we understand. So, you are asking us to take position on a small portion of the picture while the rest is hidden. I don't find it fair, and I'm concern it could even be dangerous (like shooting in the dark). I may be too worried but that's the way I feel right now.

It is not the intention of this standard to define applications, which need to be defined in the respective normative framework documents, but rather to set a framework as base for doing so.

3. The standard still lacks definition of demonstrated stakeholder support related to the national adaptation process of SLIMF and Community Forest eligibility criteria. For the sake of clarity and equal implementation of the standard in different parts of the globe, demonstrated stakeholder support has to be defined. We propose 2/3 majority among national FSC members.

Demonstrated stakeholder support needs to be defined in the 60s series for standard developers.

Current use: This concept is bound to the public consultation's feedback. The majority of respondents to this and the first draft consultation demonstrated wide support and acceptance of the proposal. This concept is used in the situation (perhaps also elsewhere), where a certification body is developing interim national standard and wants to adapt (change) the IGI. FSC-PRO-60-007 states the following:

3.3 Adaptation shall be justified when submitting the INS for approval. Justifications may be brief and may address multiple IGI simultaneously if the conditions and rationale for the decisions are identical. Justifications shall not conflict with FSC policies, standards, directives, or procedures. Adaptation requires demonstrated stakeholder support.

4. I agree with the proposed context of the standard.

5. We remain very enthusiastic about this standard; it is still short, simple, and clear even though you have introduced and explained an entirely new concept. Everyone involved should be proud of their work! We just have a few further suggestions to make.

We suggest that 'unproportional' in the introduction should be 'disproportionate'.

Changed according to the proposal.

We support the change to an 'AND/OR' in 1.1, but we do think this means that the 'either' should be deleted (as it doesn't work with 'AND'). Although the use of 'AND' and 'OR' in clauses 1.3.1 and 2.1.2.1 is commendably clear, strictly speaking it might be better to end (a) in each case with 'AND EITHER' rather than starting (b) with 'EITHER'.

Changed according to the proposal.

Finally, we believe that the note on 3.1 is sensible, and the text is probably as clear as it can be until other normative requirements have been revised; we would just suggest changing 'FSC analyses and decides upon as part of the development or revision process' to 'FSC will analyse and decide on it as part of the standard development or revision process'. Thank you!

Changed according to the proposal.

6. To define a community forest, the existence of 'collective action institutions' should be considered as the main indicator in all cases. Other indicators, such as form of tenure, or size of exploitation should be secondary.

On international or national level? However, there are no primary and secondary criteria intended.

7. It is very important for the FSC to keep an eye on small forestry producers, since they are many and are segmented all over the world. Management units should be better evaluated, as 100 hectares do not qualify as small in many countries, having a much larger area to consider. In addition to limiting the area, it also intends to limit the volume to be harvested, which goes against the idea of inclusion, as small producers must have more facilities and fewer barriers. In most cases small producers in Brazil have areas considerably larger than 100 hectares, but without having a full-time team working in the forest, without having employees dedicated to certification, nor to take care of the environment. Small forests should not only be measured by area and volume, but also on the capacity of their owners to manage their forests. MAI values should not be considered to qualify low impact harvesting as this should have difference from location to location. A planted forest has a small MAI that is added up at the end of each cycle, where the forest is all harvested. If we limit the harvests by MAI, we will have many SLIMF producers abandoning the certification because they do not fit and

The intensity rules can be adapted based on broad stakeholder support and good justification on national level.

This is exactly the intention of this new standard revision. The default approval process as a backbone of ensuring FSCs integrity and equity across the system.

cannot be a NON-SLIMF, leaving the certification and causing damage not only to the producer, but to the FSC as well.

We understand that each country can and should adapt to its reality, but we have concerns about the lack of flexibility that the PSU and PSC have in accepting the reality of each country, causing the SDG's not to have the freedom they should update the standards, thus losing the purpose that the possibility of adaptation brings.

8. Should we add the cultural services included in the approved Motion in the last GA?

Motion 53/2021 asks for incorporation of cultural services and practices to strengthen the interconnection of Indigenous Peoples and traditional peoples with their territories, including verification. It is not clear how to address this within the scope of 01-003.

ABBREVIATIONS

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



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