



SYNOPSIS OF 2ND CONSULTATION COMMENTS

The second draft of FSC-PRO-01-001 The Development
and Revision of FSC® Requirements

14/02/2023



FOREWORD

FSC-PRO-01-001 *The Development and Revision of FSC® Requirements* (hereafter written as “the procedure”) provides the process steps for how to develop, review, revise, and withdraw international FSC requirements. At FSC, it is therefore often known as the “mother procedure”.

The Performance and Standards Unit (PSU) identified the need for the revision of the procedure based on a number of issues to be addressed since the last full revision process in 2013 (in 2016, smaller changes were introduced). Additionally, the FSC Global Strategy includes streamlining the normative framework, which is a key objective of the revision of the procedure.

The first draft of the procedure was developed in collaboration with a technical working group and went through public consultation from late October 2021 to early January 2022. Subsequently, the feedback from the first consultation was incorporated and the second draft was consulted between May and June 2022. This synopsis report is based on the feedback received during the second round of public consultation and has been prepared in accordance with the current version of the procedure, FSC-PRO-01-001 V3-1.

The FSC team and the technical working group would like to thank all participants of the second public consultation.

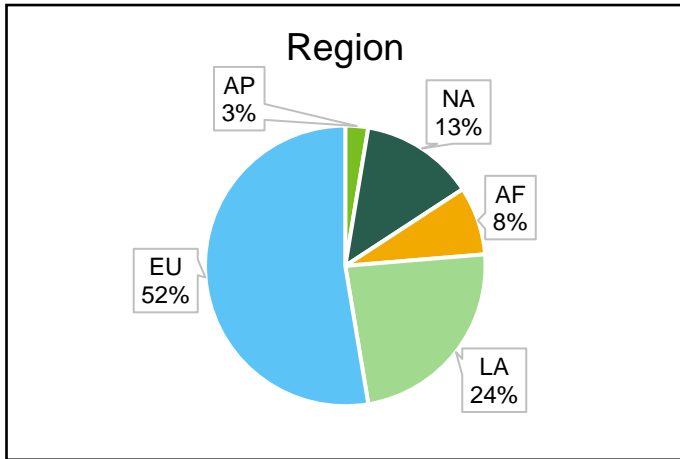
For further information related to the revision process, please visit the dedicated webpage [here](#). For comments or questions related to the revision process, please contact Juan Sabio, project lead, at systemdevelopment@fsc.org.

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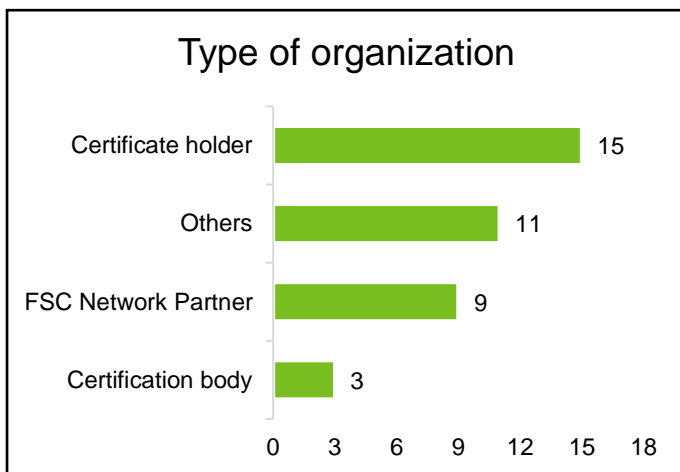
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PARTICIPATION IN THE SECOND PUBLIC CONSULTATION

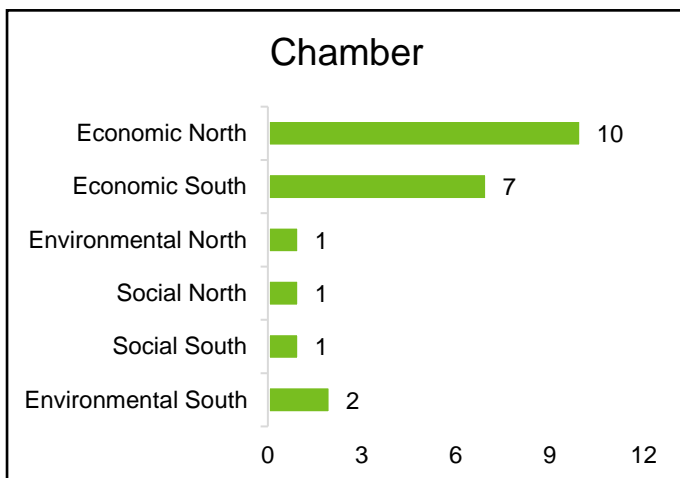
38 stakeholders¹ provided feedback in the first public consultation.



Most of the participants come from Europe (EU), ~52%. Followed by Latin America (LA), ~24%



Most respondents belonged to "Certificate holder" (15).



More than half of the respondents were FSC members (22).

Most of them belonged to the economic chamber (17).

¹ A total of forty-one stakeholders participated in the second consultation. Out of these, three responses were incomplete hence this analysis is based on thirty-eight responses.

METHODOLOGY

The second public consultation followed the same methodology as the first consultation. In the second public consultation, four key topics from the procedure were identified. While continuity was maintained on the topics from the first consultation, a few new topics were included to reflect changes in the 2nd draft of the procedure. The topics were presented in a closed question followed by an open question. The closed question asked respondents to select the level of agreement with the proposed topic (i.e., “to what extent do you agree with...”). The respondent could choose their answer from a Likert scale (i.e., “strongly agree, agree, neutral, disagree, strongly disagree”). The open question then asked the respondent to provide their rationale (i.e., “please briefly explain your rationale”).

The FSC team conducted a quantitative analysis to study the closed answers, and a qualitative analysis to study open answers.

In the quantitative analysis, answers were counted per category, and proportions were used to standardize the findings. Findings were also grouped into “positive reception” (Likert scales: strongly agree, agree, and neutral) and “not positive reception” (Likert scales: disagree and strongly disagree). Special attention was given to studying the answers with a low “positive reception” through the qualitative analysis.

In the qualitative analysis, key messages were identified across all answers. Key messages were more prominent for the ‘not positive reception’ group as respondents with a positive response did not elaborate under the open question. Therefore, while reviewing the qualitative analysis we need to bear in mind that these represent a minority view and are not attributable to all the respondents.

SUMMARY OF COMMENTS AND FSC FEEDBACK

This section is organized according to the topics presented in the second public consultation. Each topic presents: a) the questions asked in the second public consultation, b) the quantitative analysis, and c) the qualitative analysis.

The second draft was well received by stakeholders as reflected in the table below where a comparison is presented between the first and second consultation. The figures should be considered to indicate an overall trend of agreement, keeping in mind that given the number of participants the responses cannot be seen as fully representative of FSC stakeholders and the membership.

Questions (to what extent do you agree...)	Positive reception = Strongly agree + agree + neutral	Disagree + strongly disagree	Comparison from D 1-0
Q1 with the working group compositions per process type?	<u>70%</u>	30%	NA*
Q3 with the allocation of proposed decision-making responsibilities?	<u>61%</u>	39%	Improvement by 4% in positive

Q5	with the allocation of FSC requirements to another process type?	<u>95%</u>	5%	Improvement by 19% in positive
Q7	with the proposed use of public and focused consultations?	<u>84%</u>	16%	Improvement by 10% in positive
Q9	with the proposed requirements for testing?	<u>89%</u>	11%	Decrease by 11% in positive
Q11	with the requirements to avoid stagnation of processes?	<u>89%</u>	11%	NA*

*Questions not asked in first consultation

Topic 1 Working group composition and decision-making responsibilities per process type (major, regular, accelerated)

a) Questions in the second public consultation

Question 1: To what extent do you agree with the **working group compositions** per process type?

Question 2: Please briefly explain your rationale.

Question 3: To what extent do you agree with the **allocation of proposed decision-making responsibilities**?

Question 4: Please briefly explain your rationale.

Question 5: To what extent do you agree with the **allocation of FSC requirements to another process type**?

Question 6: Please briefly explain your rationale.

b) Quantitative analysis

Questions --> Responses	Q1		Q3		Q5	
	Count	%	Count	%	Count	%
Strongly Agree	8	22%	6	17%	9	24%
Agree	15	41%	13	36%	22	59%
Neutral	3	8%	3	8%	4	11%
Disagree	8	22%	7	19%	0	0%
Strongly disagree	3	8%	7	19%	2	5%
Total	37	100%	36	100%	37	100%

The positive reception of question 1 was 70%. For question 3 it was 61%. For question 5 it was 95%.

Although question 3 had the lowest “positive reception” in the second public consultation, this result shows a 4% improvement in reception over the first public consultation.

The response to the qualitative feedback is provided below. Please consider that the qualitative analysis almost exclusively shows comments made by stakeholders disagreeing with the proposals as explained in the methodology section.

c) Qualitative analysis

Nr	Key Stakeholder Feedback	FSC’s comment
1	Accelerated process should include external experts.	This requires no changes as the existing draft has a provision to include external experts for accelerated process. However, it is not mandatory.
2	Key Advice Notes should have all steps as per the regular process and not be categorized under accelerated process type.	The normative framework schedule has a provision to allow for re-allocation of process types. The current version of the procedure already makes a distinction between technical and chamber-balanced processes and allows for a process to be followed that is similar to the accelerated process. Therefore, these proposals are not in line with the mandate from the Global Strategy to streamline the procedure, which includes making the process more effective and efficient. The revised procedure includes several new requirements to improve the effectiveness of requirements, e.g., by introducing a conceptual phase, by giving stronger emphasis on testing and monitoring of requirements and by allowing the normative framework (NF) to move towards outcome orientation for sets of key international normative requirements. Efficiency gains also need to be maintained and if possible increased for some aspects of the procedure to make the process more robust. Changes to the decision-making parts of the procedure will therefore be important to fulfil the mandate of the Global Strategy and Board of Directors (BoD).
3	Regular process should be chamber balanced & have regional representation	The procedure also has a provision to allow for re-allocation of process types by the BoD and to change the final decision-making body, therefore some flexibility is retained to change the process type.
4	Important procedures e.g. FSC-PRO-01-001 should be decided by the BoD.	

5 Final decision on the Normative Framework schedule should be by PSC or BoD.

The procedure includes a standardized process asking FSC's BoD to give guidance on the allocation of processes.

6 The final decision-making body for accelerated process should be PSC/BoD.

Topic 2 Consultations

a) Questions in the second public consultation

Question 7: To what extent do you agree with the proposed use of **public and focused consultations**?

Question 8: Please briefly explain your rationale.

Quantitative analysis

Questions --> Responses	Q7	
	Count	%
Strongly Agree	10	26%
Agree	19	50%
Neutral	3	8%
Disagree	4	11%
Strongly disagree	2	5%
TOTAL	38	100%

The positive reception of question 7 was 84%. There was an improvement in 'positive reception' on this topic by 16% in comparison to the previous draft.

b) Qualitative analysis

Nr	Key Stakeholder Feedback	FSC's comment
1	Regular process should have public consultations. It should be possible to join focused consultation while the process is in progress.	The focused consultation will be open to all interested stakeholders with the possibility to join anytime while the process is ongoing.
2	Balancing comments from different stakeholder groups while evaluating consultation results by chamber and stakeholder category.	The working groups consider the positions of different stakeholder groups in the analysis. The procedure allows differentiation of feedback by stakeholder group in the Consultation Report.
3	All individual consultation results should be made public.	FSC is complying with data protection regulations.

Topic 3 Testing

a) Questions on the testing requirements

Question 9: To what extent do you agree with the proposed requirements for **testing**?

Question 10: Please briefly explain your rationale and/or include suggestions for improvement.

b) Quantitative analysis

Questions -->	Q7	
Responses	Count	%
Strongly Agree	17	47%
Agree	11	31%
Neutral	4	11%
Disagree	3	8%
Strongly disagree	1	3%
TOTAL	36	100%

The positive reception of question 9 was 89%. While there is a fall in level of agreement by 11%, this change is attributable to the fact that the requirements on testing have been expanded in the second consultation. Overall, the positive reception is high.

c) Qualitative analysis

Nr	Key Stakeholder Feedback	FSC's comment
1	Testing should be mandatory for some processes.	This will have to be decided in the conceptual phase of each process.
2	Further clarity needed on how and when testing will be applied.	This is an operational topic which will be addressed outside the procedure.

Topic 4 Ways to avoid stagnation

a) Questions in the second public consultation

Question 11: To what extent do you agree with the requirements to **avoid stagnation** of processes?

Question 12: Please briefly explain your rationale.

b) Quantitative analysis

Questions -->	Q9	
Responses	Count	%
Strongly Agree	22	61%
Agree	6	17%
Neutral	4	11%
Disagree	2	6%
Strongly disagree	2	6%
TOTAL	36	100%

The positive reception of question 11 was 89%. The final decision on this requirement will be taken along with the decision on the procedure by the BoD.

c) Qualitative analysis

Nr	Key Stakeholder Feedback
1	Ideal to make Director General the final decision maker to overcome stagnation. (9 responses)
2	Final decision-making power should be with the BoD to overcome stagnation. (4 responses)



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