



# SYNOPSIS OF CONSULTATION COMMENTS

Second Draft of FSC-STD-20-007 V4-0 D2-0 Forest  
Management Evaluations Standard

1/02/2023



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**Title:** Synopsis of Consultation Comments

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## FOREWORD

The revision process of the FSC-STD-20-007 *Forest Management Evaluations Standard* and its addenda officially started in March 2020. The FSC-STD-20-007 Technical Working Group (TWG) was established at the end of January 2021 with the mandate to revise the fundamental approach of FSC towards forest management evaluations, including evaluation methods, intensity, frequency, duration, data gathering, reporting, current structure of evaluation standards, etc.

In a parallel process, FSC revised the *FSC-PRO-60-010 Incorporating a risk-based approach in National Forest Stewardship Standards and its Guideline* which provides the process steps for incorporating a risk-based approach (RBA) in National Forest Stewardship Standards. The RBA-TWG has also been mandated with the development of requirements in the Forest Management Evaluations Standard for a risk-based assurance system. The mandate of the RBA-TWG has recently finalized and the FSC-STD-20-007 TWG worked together with the RBA team in the integration and finalization of the clauses in the FSC-STD-20-007. These requirements were presented in the second draft of the revised FSC-STD-20-007 with mark-ups indicating which TWG developed them.

In parallel to the FSC-STD-20-007 revision, FSC also developed the *FSC-PRO-30-011 Continuous Improvement Procedure*, which provides a stepwise approach to the certification of SLIMF and community forests. This new procedure has been recently approved by the FSC Board of Directors. FSC has also launched the Forest Management Digital Audit Reporting Template which will be implemented in phases across all FSC Forest Management evaluations. The digital audit template is based on existing requirements in *FSC-STD-20-007a Forest Management Evaluations Addendum-Forest Certification Reports*. Once the revision of FSC-STD-20-007 is concluded, the template will be updated accordingly to reflect any changes agreed through the revision process, if needed.

The authors of this report would like to thank FSC members and stakeholders for their participation in the public consultation on the second draft of the Forest Management Evaluations standard. Their suggestions and comments are of great importance to the development of the final draft of the standard.

This synopsis report has been prepared in accordance with Clause 5.12 of FSC-PRO-01-001 (V 3-0)1 and contains an analysis of the range of stakeholder groups who submitted comments, as well as a summary of the issues raised in relation to the questions posted during the public consultation period. A general response to the comments and an indication as to how the issues raised were addressed are provided in the compiled comments document.

For further information related to the policy development, please visit the webpage dedicated to this page here. For more information related the report, please contact FSC Forest management policy manager Diana Franco at [d.franco@fsc.org](mailto:d.franco@fsc.org)

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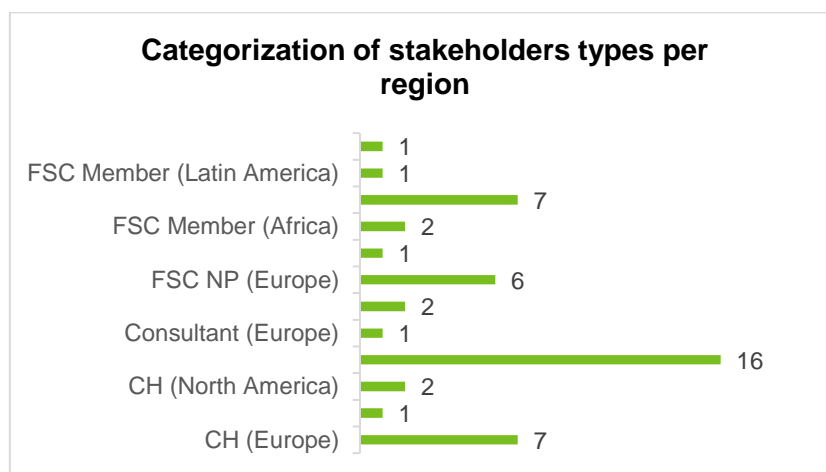
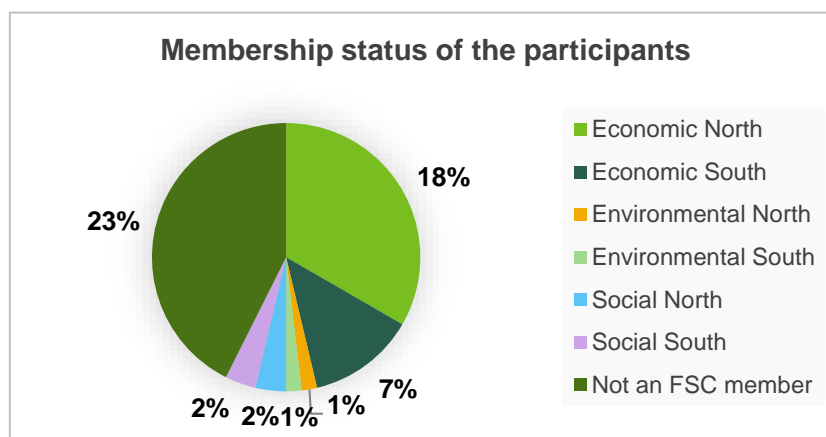
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## ABBREVIATIONS

<b>ASI</b>	Assurance Services International
<b>CB</b>	Certification Body
<b>CH</b>	Certificate Holder
<b>CoC</b>	Chain of Custody
<b>FM</b>	Forest Management
<b>FSC</b>	Forest Stewardship Council
<b>HCV</b>	High Conservation Values
<b>MU</b>	Management Unit
<b>NC</b>	Non-conformity
<b>NP</b>	Network Partner
<b>PSU</b>	Policy and Standards Unit
<b>SLIMF</b>	Small and Low Intensity Managed Forests
<b>TWG</b>	Technical Working Group

## PART I. PUBLIC CONSULTATION PARTICIPATION OVERVIEW

The second draft of FSC-STD-20-007 V4-0 was publicly consulted between 18 May and 16 July 2022. A total of 54 participants provided their comments on the proposed requirements. The graphics below provide an overview of the stakeholder groups that participated in this consultation:



The 54 participants that provided their inputs into the second public consultation represent 23 countries: Chile, Switzerland, Ukraine, Germany, Gabon, United States, Democratic Republic of the Congo, Finland, Brazil, Canada, India, Indonesia, Spain, Peru, Poland, United Kingdom, Sweden, Portugal, Cameroon, Sri Lanka, France, Philippines and Canada.

## PART II. ANALYSIS METHODOLOGY OF PUBLIC CONSULTATION RESULTS

To develop effective means of compiling consultation input through the FSC Public consultation platform, the TWG and the FSC Performance and Standards Unit (PSU) developed a two-step methodology for the consultation structure and analysis of the consultation feedback. The consultation structure and questions were developed to have a quantitative and qualitative element for most question items, that would allow PSU and the TWG to gather input that would showcase the level of agreement as well as any improvement suggestions from FSC membership and other stakeholders.

Between 9 August and 19 September, the TWG held a four day in-person working group meeting and five (5) online meetings to analyze and discuss the feedback received during the second public

consultation. The TWG focused on how to integrate membership and stakeholders' feedback, and aspirations into the final draft.



**1. Quantitative analysis:** Out of 31 questions posted during the public consultation, 16 items asked participants to answer multiple choice questions and choose from “strongly disagree” to “strongly agree”. The quantitative questions would provide the TWG with an understanding of the overall level of agreement with the topics presented in the consultation.

Quantitative analysis was conducted by converting all quantitative responses into percentile comparison tables for each of these 16 questions. The analysis was done for all question items and the responses to each of them with a categorization of all participants to the consultation, based on the following types: (1) member/non-member and chamber as well the distinction between the ‘northern’ and ‘southern’ sub-chambers, (2) certificate holder, (3) certification body/auditor, (4) consultant, (5) FSC staff and (6) FSC network partners.



**2. Qualitative analysis:** To complement the quantitative analysis, each quantitative question was coupled with a qualitative question, where the respondents were requested to provide their suggestions for further improvement of the topics included into the consultation. The qualitative analysis was conducted by identifying for each response, the respondents' membership affiliation, region of origin and stakeholder type. Each response was analyzed and summarized for the purpose of the prioritization exercise.

Following the completion of qualitative analysis, a prioritization exercise was conducted by PSU and TWG to allow for structured assessment and consideration of the full scope of the feedback gathered. The prioritization exercise focused on evaluating recurring themes in the consultation feedback, identification of improvement areas and overall compilation of guidance for the development of draft 2.0 that considers the consultation feedback.

## PART III. SUMMARY OF CONSULTATION RESULTS & PSU COMMENTS

Below is a summary of key topics stakeholders and members provided feedback on, together with PSU comments describing how these comments were addressed. Each key topic contains two/three sections: a) questions posted during public consultation; b) quantitative results (for multiple choices questions only), and c) qualitative results and PSU comment.

**Note:** The qualitative results below contain a summary of stakeholders/membership feedback only, not all comments received are presented in the report.

### Structure of the draft

#### a) Questions posted during public consultation

Q1.Are the requirements and their sequence in the standard written clearly and easy to find? (Please indicate your level of agreement from 0-100%)?

Q2.Do you have any comments or suggestions regarding the document structure, flow and clarity?

## b) Quantitative results

Participant type	Region / Sub-chamber	Question 1. Are the requirements and their sequence in the standard written clearly and easy to find? (please indicate your level of agreement from 0-100%)
Certificate holder	<b>CH overall (average)</b>	87,50
	CH (Africa)	75,00
	CH (Europe)	75,00
	CH (Latin America)	100,00
	CH (North America)	100,00
Certification body/auditor	<b>Certification body / auditor</b>	87,50
Consultant	<b>Consultant overall (average)</b>	93,75
FSC Network Partner staff	<b>FSC NP overall (average)</b>	81,25
	<b>Member (region) overall (average)</b>	90,00
	FSC Member (Africa)	75,00
	FSC Member (Europe)	85,00
	FSC Member (Latin America)	100,00
FSC Member per region	FSC Member (North America)	100,00
	<b>Member (chamber) overall (average)</b>	73,74
	Economic North	86,54
	Economic South	82,14
	Environmental North	50,00
FSC Member per sub-chamber	Environmental South	75,00
	Social North	75,00
	Social South	87,50
Non-member	<b>Not an FSC member</b>	93,75

## c) Qualitative results

**Question 2. Do you have any comments or suggestions regarding the document structure, flow and clarity?**

Details of qualitative results analysis:		
Stakeholder/Membership feedback	PSU comment	
→ Not user-friendly text for people unaware of certification → Contractors and sampling requirements are confusing → Guidance about NCs in draft 2.0 much narrower than in 20-001. Further	The feedback has been considered by the TWG and PSU who revised the terms and definitions section. Some comments from stakeholders did not relate to this section of the standard, however they were considered by the TWG in the revision of other parts of the standard such as the section on sampling and reduction of abbreviations.	



information or a reference to 20-001 needed.

→ Section 8 has taken a step backwards and needs to be improved as it is complicated and challenging (e.g., decision trees or examples)

→ Fewer abbreviations would be welcomed and added cross-references (e.g. general requirements with Part II)

→ Graphic 1 is problematic and includes unnecessary information and needs revision

→ Clarify group and multisite MU requirements

The comment about expanding guidance about non-conformities has been considered by the TWG, but it did not result in changes to the FSC-STD-20-007 since these requirements have been removed from the FSC-STD-20-007 as they are already covered in FSC-STD-20-001.

#### d) PSU comment

The TWG understands that the overall changes to structure of the draft standard are providing better clarity, efficiency, and flow to the standard. There are areas identified in the standard that have been further improved in the draft in response to stakeholders' feedback.

## Terms & definitions

#### a) Questions posted during public consultation

Q3. Is the new definition for 'remote auditing' clear?

Q4. Do you have any further recommendations for improving the definition of remote audit?

Q5. Are there any other terms in the standard that require a definition or an improved definition? Please specify

#### b) Quantitative results

Participant type	Region / Sub-chamber	Question 3. Is the new definition for 'remote auditing' clear?
Certificate holder	<b>CH overall (average)</b>	98,33
	CH (Africa)	-
	CH (Europe)	95,00
	CH (Latin America)	100,00
	CH (North America)	100,00
Certification body/auditor	<b>Certification body / auditor</b>	95,00
Consultant	<b>Consultant overall (average)</b>	93,75
FSC Network Partner staff	<b>FSC NP overall (average)</b>	97,92
FSC Member per region	<b>Member (region) overall (average)</b>	87,05
	FSC Member (Africa)	87,50
	FSC Member (Europe)	60,71

<b>FSC Member per sub-chamber</b>	FSC Member (Latin America)	100,00
	FSC Member (North America)	100,00
	<b>Member (chamber) overall (average)</b>	<b>77,38</b>
	Economic North	84,38
	Economic South	90,00
	Environmental North	75,00
	Environmental South	75,00
	Social North	62,50
	Social South	87,50
<b>Non-member</b>	<b>Not an FSC member</b>	<b>95,24</b>

### c) Qualitative results

**Q4. Do you have any further recommendations for improving the definition of remote audit?**

Details of qualitative results analysis:	
Stakeholder/Membership feedback	PSU comment
<ul style="list-style-type: none"> <li>→ Include notion about sending of georeferenced images</li> <li>→ Include notion that interviews can also be by telephone, and when not possible, a questionnaire can be submitted and sent via courier. Videos/video calls can be used to verify MUs.</li> <li>→ Desk audits normally refer to document review. Suggestion to delete this.</li> <li>→ Definition should already entail to which circumstances it can be applied.</li> <li>→ Are all desk audits now remote audits? There used to be a distinction.</li> </ul>	<p>The comments have been considered by the TWG and the definition further developed and clarified. The term desk audits was also removed from the definition.</p>

**Question 5. Are there any other terms in the standard that require a definition or an improved definition? Please specify.**

Details of qualitative results analysis:	
Stakeholder/Membership feedback	PSU comment
<ul style="list-style-type: none"> <li>→ Revise the active MU definition to include also the MUs that are in operation during the audit. Additionally consider non-chemical invasive species management to prompt active MU definition.</li> <li>→ What would be reasons as to why an organization would not define active and inactive MUs?</li> </ul>	<p>The recommendations have been considered by the TWG. However, not all of them have been incorporated into the draft standard since some items could be clarified through a guidance (e.g., Guidance on how to fill in the digital reporting template, or</p>

→ Include definitions for: (1) preliminary report, (2) minor accidents, (3) Serious accidents, (4) major failure, (5) critical aspects of management control, (6) critical points of risk of non-conformity, (7) root cause [C15.6], (8) investigate, (9) many [C16.2], (10) few [C16.2], (11) Contractor, (12) 'like' MUs, (13) partial or remote audit with on-site

→ Revise Box 1: Site disturbing activities should follow the definition for active MU

through examples) and not necessarily need a specific definition in the standard.

## Section 1. General Requirements

### a) Questions posted during public consultation

Q6. In the previous version of this Clause, primary or secondary processing facilities could be included within the scope of FM/CoC certificates under certain conditions. The TWG removed this option for transparency and certification integrity. Do you support this change?

Q7. Please provide suggestions for improvement, if any

### b) Quantitative results

Participant type	Region / Sub-chamber	Question 6. Do you support this change for primary and secondary processing facilities not being included into the scope of FM/CoC certificates?
Certificate holder	<b>CH overall (average)</b>	<b>55,56</b>
	CH (Africa)	-
	CH (Europe)	16,67
	CH (Latin America)	50,00
	CH (North America)	100,00
Certification body/auditor	<b>Certification body / auditor</b>	<b>82,69</b>
Consultant	<b>Consultant overall (average)</b>	<b>87,50</b>
FSC Network Partner staff	<b>FSC NP overall (average)</b>	<b>59,38</b>
FSC Member per region	<b>Member (region) overall (average)</b>	<b>88,13</b>
	FSC Member (Africa)	87,50
	FSC Member (Europe)	65,00
	FSC Member (Latin America)	100,00
	FSC Member (North America)	100,00
FSC Member per sub-chamber	<b>Member (chamber) overall (average)</b>	<b>78,42</b>
	Economic North	64,58
	Economic South	90,00
	Environmental North	100,00
	Environmental South	75,00
	Social North	62,50
	Social South	100,00
Non-member	<b>Not an FSC member</b>	<b>76,39</b>

### c) Qualitative results

**Question 7. Please provide suggestions for improvement, if any:**

Details of qualitative results analysis:	
Stakeholder/Membership feedback	PSU comment
<p>→ Primary and secondary processing facilities owned by the Organization should be included still to facilitate logistics and reduce transfer confusion. The option should be retained with certain conditions (community and small organizations mentioned).</p> <p>→ Clarify the possibility of including handling of product within the scope of FM/CoC certification</p> <p>→ Include to Note under C1.5 'latex transformation' and clarification onto 'low intensity activities'</p> <p>→ Portable charcoal kilns -&gt; small charcoal kilns</p> <p>→ The exception should be maintained for SLIMF and communities</p>	<p>The stakeholder feedback has been considered by the TWG that decided to retain the option of including primary processing facilities within the FM/CoC scope only for SLIMF and community forests. This option has been retained considering their reduced scale, intensity and risks, and with the condition that 100% of the inputs of these facilities come from SLIMF or community forest MUs in the scope of certification. For all other organizations and scenarios, a separate CoC certificate is required.</p> <p>The examples of Non Timber Forest Products (NTFPs) such as latex and small charcoal kilns were included in the requirements following the stakeholder feedback.</p>

## Section 3. The Organization Profile

### a) Questions posted during public consultation

Q8. Do you have any general comments or recommendations for the improvement of the Organization Profile or the selected name for this tool?

Q9. Do you agree the requirements regarding the application of NFSS Risk Assessments in FM Evaluations, where more focus is given to specified risk requirements, are clear?

Q10. Do you agree with the introduction of the possibility for the certification body to conduct their own risk assessment to refine - at organizational level - the risk designations of an NFSS Risk Assessment, once they are available?

Q11. The Organization Profile (Annex A) provides the aspects that certification bodies have to consider conducting their own risk assessment of The Organization and when needed, changing - at The Organization level - the risk designation to criteria and/or indicators of an NFSS Risk Assessment. Do you agree with the content of the Organization Profile?

Q12. For requirements designated as low risk in the NFSS Risk Assessment, the certification body is not required to actively seek evidence of conformity of The Organization against these requirements in all types of evaluations (main evaluation, surveillance evaluation and re-evaluation) unless there are substantiated concerns from stakeholders about the low-risk designation. With this approach, FSC

expects to streamline the evaluation requirements for low-risk requirements, enabling certification bodies to focus on the requirements with specified risk. Do you agree with this proposal?

Q13. Do you have any comments or recommendations for the improvement of the requirements related to the application of NFSS Risk Assessments in FM evaluations?

## b) Quantitative results

Participant type	Region / Sub-chamber	Question 9. Do you agree the requirements regarding the application of NFSS Risk Assessments in FM Evaluations, where more focus is given to specified risk requirements, are clear?
Certificate holder	<b>CH overall (average)</b>	83,33
	CH (Africa)	-
	CH (Europe)	100,00
	CH (Latin America)	50,00
	CH (North America)	100,00
Certification body/auditor	<b>Certification body / auditor</b>	82,69
Consultant	<b>Consultant overall (average)</b>	87,50
FSC Network Partner staff	<b>FSC NP overall (average)</b>	96,88
FSC Member per region	<b>Member (region) overall (average)</b>	76,88
	FSC Member (Africa)	62,50
	FSC Member (Europe)	70,00
	FSC Member (Latin America)	75,00
	FSC Member (North America)	100,00
FSC Member per sub-chamber	<b>Member (chamber) overall (average)</b>	71,67
	Economic North	83,33
	Economic South	75,00
	Environmental North	75,00
	Environmental South	50,00
	Social North	75,00
	Social South	100,00
Non-member	<b>Not an FSC member</b>	75,00

Participant type	Region / Sub-chamber	Question 10. Do you agree with the introduction of the possibility for the certification body to conduct their own risk assessment to refine - at organizational level - the risk designations of an NFSS Risk Assessment, once they are available?
Certificate holder	<b>CH overall (average)</b>	87,50
	CH (Africa)	-
	CH (Europe)	100,00

	CH (Latin America)	75,00
	CH (North America)	87,50
<b>Certification body/auditor</b>	<b>Certification body / auditor</b>	<b>53,85</b>
<b>Consultant</b>	<b>Consultant overall (average)</b>	<b>87,50</b>
<b>FSC Network Partner staff</b>	<b>FSC NP overall (average)</b>	<b>71,88</b>
	<b>Member (region) overall (average)</b>	<b>70,00</b>
<b>FSC Member per region</b>	FSC Member (Africa)	100,00
	FSC Member (Europe)	55,00
	FSC Member (Latin America)	25,00
	FSC Member (North America)	100,00
	<b>Member (chamber) overall (average)</b>	<b>66,54</b>
<b>FSC Member per sub-chamber</b>	Economic North	82,69
	Economic South	75,00
	Environmental North	0,00
	Environmental South	100,00
	Social North	75,00
	Social South	100,00
<b>Non-member</b>	<b>Not an FSC member</b>	<b>52,94</b>

<b>Participant type</b>	<b>Region / Sub-chamber</b>	<b>Question 11. Do you agree with the content of the Organization Profile?</b>
<b>Certificate holder</b>	<b>CH overall (average)</b>	<b>83,33</b>
	CH (Africa)	-
	CH (Europe)	87,50
	CH (Latin America)	75,00
	CH (North America)	87,50
<b>Certification body/auditor</b>	<b>Certification body / auditor</b>	<b>67,31</b>
<b>Consultant</b>	<b>Consultant overall (average)</b>	<b>75,00</b>
<b>FSC Network Partner staff</b>	<b>FSC NP overall (average)</b>	<b>53,13</b>
	<b>Member (region) overall (average)</b>	<b>85,63</b>
<b>FSC Member per region</b>	FSC Member (Africa)	87,50
	FSC Member (Europe)	55,00
	FSC Member (Latin America)	100,00
	FSC Member (North America)	100,00
	<b>Member (chamber) overall (average)</b>	<b>74,00</b>
<b>FSC Member per sub-chamber</b>	Economic North	75,00
	Economic South	95,00
	Environmental North	50,00
	Environmental South	75,00
	Social North	75,00
	Social South	75,00
<b>Non-member</b>	<b>Not an FSC member</b>	<b>64,71</b>

Participant type	Region / Sub-chamber	Question 12. Do you agree with the proposal for low risk indicators not being actively evaluated in any upcoming evaluation?
Certificate holder	<b>CH overall (average)</b>	100,00
	CH (Africa)	-
	CH (Europe)	100,00
	CH (Latin America)	100,00
	CH (North America)	100,00
Certification body/auditor	<b>Certification body / auditor</b>	67,31
Consultant	<b>Consultant overall (average)</b>	100,00
FSC Network Partner staff	<b>FSC NP overall (average)</b>	81,25
FSC Member per region	<b>Member (region) overall (average)</b>	78,13
	FSC Member (Africa)	87,50
	FSC Member (Europe)	75,00
	FSC Member (Latin America)	50,00
	FSC Member (North America)	100,00
FSC Member per sub-chamber	<b>Member (chamber) overall (average)</b>	85,08
	Economic North	90,38
	Economic South	85,00
	Environmental North	100,00
	Environmental South	75,00
	Social North	75,00
	Social South	100,00
Non-member	<b>Not an FSC member</b>	57,35

### c) Qualitative results

**Question 8. Do you have any general comments or recommendations for the improvement of the Organization Profile or the selected name for this tool?**

Details of qualitative results analysis:		
	Stakeholder/Membership feedback	PSU comment
	<p>→ Name of Annex 1 misleading - Proposal: "Audit eligibility assessment for remote auditing in non-SLIMF orgs"</p> <p>→ Why CB change triggers on-site auditing?</p> <p>→ Credibility at risk with remote auditing</p> <p>→ Number of NCs should be removed from the Annex 1</p>	<p>The stakeholder feedback and the concept of the Organization Profile has been discussed by the TWG that decided to remove it from the draft standard.</p>



- The process of CBs redesignating risks should be further tested
- Remote interviews cannot replace face-to-face interviews
- ASI study on remote auditing being used as a reference not to include full remote audit option
- Annex 1 revision to be more of an remote audit extent and plausibility analysis and as part of the public summary
- There are no clear requirements for the implementation of the OP by the CB

**Question 13. Do you have any comments or recommendations for the improvement of the requirements related to the application of NFSS Risk Assessments in FM evaluations?**

Details of qualitative results analysis:		
	Stakeholder/Membership feedback	PSU comment
	<ul style="list-style-type: none"> <li>→ Integrity risks with CBs being able to redesignate and lower risk designations</li> <li>→ Disparity potential: CBs more willing to downgrade risk might become more appealing to CHs</li> <li>→ Heightened need for ASI oversight with risk designations</li> <li>→ OP changes to risk designations should have the same rigour as the actual development of the NFSS-RA</li> <li>→ Integrity risk: If CB never actively seeks evidence of conformity against low-risk requirements</li> <li>→ ASI disagree with the approach, especially with ME. ME and RE without risk designation impact on scope of auditing.</li> <li>→ Clause 11.2: proposal to rephrase as Specified Risk definition from the public report of consultation.</li> <li>→ What is the actual benefit in time reduction? It might be a zero-sum game</li> </ul>	<p>Although the TWG agreed with the concerns from some stakeholders about the risks involved in allowing CBs to change risk designations of NFSS Risk Assessments, the TWG had the opinion that such requirement would be relevant to be implemented in some countries where many indicators would fall into the “specified risk” category of the NFSS Risk Assessment, and that not including this option in the final draft could hinder the development that has been done so far on this topic by the RBA and FSC-STD-20-007 TWGs. The TWG agreed that, as the NFSS Risk Assessment provide a more general risk designation, this might need to be revised at the level of individual Organizations based on their ability to manage and mitigate risks of non-conformities. The TWG therefore agreed with incorporating this requirement into the final draft standard with the following recommendation: “FSC should further monitor its implementation to understand the possible impacts and revise it in the future, if necessary”.</p>



- Clause 3.2 not clear - can the CB reduce the risk designation?
- Examples of the RBA procedure and what constitutes specified risk and low risk would be beneficial
- What happens when ASI disagrees with CB risk designation?
- All changes to NFSS-RA need to be included in the evaluation report and public summary
- Audit time determination should be included in the evaluation report and public summary
- Time saved from not actively seeking evidence of conformity with low-risk requirements should be reallocated to specified risk
- Additional preconditions related to no active seeking of evidence of conformity against low-risk requirements.
- Unspecified risk needs clarification with Sections 10 and 11. What is the requirement for their evaluation?
- CB risk assessment should not contradict with NFSS-RA - they should merely refine them and react to changes (low -> specified if needed)
- Annex 1 is merely about remote auditing eligibility and should be revised
- Low risk requirements should at least be evaluated during ME
- Only designated people with local expertise should be able to refine the NFSS-RA results / or changes to be approved by the NFSS-RA development entity
- Use of pesticides should be included into the OP
- Audit time determination should have some flexibility to allow for adjustments in time if needed to clarify any aspects of concern
- Clauses 10.1.2, 11.3, and 12.3 should be specifically about SH concerns about

the Organization or a specific region of MUs

→ Clause 3.3 forces the hand of the CB

→ Direct recommendations for revision of the Annex 1.

→ Why are the CB risk assessment decisions with increased risk not included in the public summary?

## Sections 4 and 5. Determination of audit time and determination of the audit method

### a) Questions posted during public consultation

Q14. Do you agree with the proposed requirements for the determination of the audit methods?

Q15. Do you agree that the eligibility criteria for remote auditing specified in the Organization Profile (Annex 1) sufficiently covers the pre-conditions that need to be taken into account when defining the application of remote auditing in FM evaluations?

Q16. Do you have any comments or recommendations for the improvement of the requirements on audit methods?

Q17. Do you have any suggestions for the improvement of the audit time requirements (Section 5)?

### b) Quantitative results

Participant type	Region / Sub-chamber	Question 14. Do you agree with the proposed requirements for the determination of the audit methods?
Certificate holder	<b>CH overall (average)</b>	90,00
	CH (Africa)	-
	CH (Europe)	70,00
	CH (Latin America)	100,00
	CH (North America)	100,00
Certification body/auditor	<b>Certification body / auditor</b>	73,21
Consultant	<b>Consultant overall (average)</b>	93,75
FSC Network Partner staff	<b>FSC NP overall (average)</b>	68,75
FSC Member per region	<b>Member (region) overall (average)</b>	81,25
	FSC Member (Africa)	87,50
	FSC Member (Europe)	37,50
	FSC Member (Latin America)	100,00
	FSC Member (North America)	100,00
FSC Member per sub-chamber	<b>Member (chamber) overall (average)</b>	63,00
	Economic North	65,00
	Economic South	100,00

	Environmental North	0,00
	Environmental South	75,00
	Social North	75,00
	Social South	75,00
<b>Non-member</b>	<b>Not an FSC member</b>	<b>79,41</b>

Participant type	Region / Sub-chamber	Question 15. Do you agree that the eligibility criteria for remote auditing specified in the Organization Profile (Annex 1) sufficiently covers the pre-conditions that need to be taken into account when defining the application of remote auditing?
	<b>CH overall (average)</b>	<b>91,67</b>
	CH (Africa)	-
	CH (Europe)	75,00
	CH (Latin America)	100,00
	CH (North America)	100,00
<b>Certificate holder</b>		
<b>Certification body/auditor</b>	<b>Certification body / auditor</b>	<b>85,71</b>
<b>Consultant</b>	<b>Consultant overall (average)</b>	<b>93,75</b>
<b>FSC Network Partner staff</b>	<b>FSC NP overall (average)</b>	<b>75,00</b>
	<b>Member (region) overall (average)</b>	<b>78,13</b>
<b>FSC Member per region</b>	FSC Member (Africa)	75,00
	FSC Member (Europe)	37,50
	FSC Member (Latin America)	100,00
	FSC Member (North America)	100,00
	<b>Member (chamber) overall (average)</b>	<b>60,17</b>
<b>FSC Member per sub-chamber</b>	Economic North	68,33
	Economic South	95,00
	Environmental North	0,00
	Environmental South	50,00
	Social North	87,50
	Social South	75,00
<b>Non-member</b>	<b>Not an FSC member</b>	<b>85,29</b>

### c) Qualitative results

**Question 16. Do you have any comments or recommendations for the improvement of the requirements on audit methods?**

#### Details of qualitative results analysis:

Stakeholder/Membership feedback	PSU comment
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- Suggestion to make Annex 1 more a plausibility analysis which parts of the audit could be conducted remotely
- Graphic 1 needs revision (full on-site audit may include some form of remote evaluation of documents and SH interviews)
- Improve the provisions for remote auditing of SLIMF and community forests
- For all non-SLIMF, at least a technical expert on the ground should be a requirement
- Unspecified variable costs of contract are illegal in some countries
- Large MUs need annual field visits - to lighten the audit load, a shorter list of mandatory criteria could be established
- Size classification of clause 11.5 should be included into OP - remote auditing only applicable to small MUs and ones without HCV
- Partial remote auditing would be acceptable - full remote audit only for SLIMF
- Review (and revision) of C5.3, C5.6, C5.7 and C5.9 need revision
- Three remote audits per certification cycle rather than two for low-risk organizations
- Clarity to what partial remote auditing means. Clarity to plausibility analysis.

In both first and second public consultations, there was a mix of concern and support for remote audits being an option for forest management audits. Some stakeholders argued that these audits should never be conducted remotely and that remote audits pose a risk to the credibility of the system. Others argued that it was appropriate since this was only an option for 2 of 5 surveillance audits and only when specific eligibility criteria were met. And finally, some argued that certificate holders should have the right to request only on-site audits (i.e., to not have remote audits) as on-sites audits are considered a valuable learning experience. Based on that, the TWG decided to revise the remote auditing related requirements and propose in the final draft a different approach in relation to what has been consulted in the first and second public consultations. While in previous drafts, full remote audits were an option for all type of organizations meeting certain criteria, in the final draft, the option of conducting full remote auditing has been retained for organizations that manage SLIMF MUs and/or community forests. For all other organizations, the default audit method is on-site audit. This means that for these organizations, there should be at least one qualified auditor carrying out on-site audits. Audit teams may include also some auditors auditing the organization remotely provided that some eligibility criteria specified in the Annex A of the standard are met. The TWG considered that with this approach, the risks expressed by the several parties would be addressed, while the potential benefits of remote auditing such as the reduction of costs and carbon footprint of audits and the promotion of the use of technology to support FM audits would be maintained.

**Question 17. Do you have any suggestions for the improvement of the audit time requirements (Section 5)?**

**Details of qualitative results analysis:**

**Stakeholder/Membership feedback**

- Reintroduce ADV-note on FM audit time with similar thresholds
- Requesting documents prior to the audit is essential

**PSU comment**

The withdrawn advice note on FM audit time has been withdrawn some years ago due to the negative stakeholder feedback. Therefore, the suggestion to reintroduce the advice note has not been accepted.

- Good performance and low risk profile could mean lower audit time - but still on-site audits should be done
- Audit time determination to be report both in evaluation report and public summary
- Reduced audit time from low-risk requirements should be reallocated to specified risk requirements
- Audit time determination does not include prep., update and review of the OP
- Should have a requirement to justify audit time for in person audit

The suggestions to include the justification for the audit time in the audit report and public summaries and the option of requesting documents prior to an audit have been incorporated into the draft.

The proposal of allocating time to higher risk requirements are now possible due to the risk-based approaches incorporated into the draft standard.

## Section 8. Selecting management units and sites for evaluation

### a) Questions posted during public consultation

Q18. Do you agree with the proposed section 8 on selecting management units and sites for evaluations?

Q19. Do you have any recommendations for improvement of section 8?

Q20. Do you agree with the proposed new requirements on the sampling of contractors by certification bodies?

Q21. Do you have any comments or recommendations for the improvement of the requirements on the sampling of contractors by certification bodies?

### b) Quantitative result

Participant type	Region / Sub-chamber	Question 18. Do you agree with the proposed section 8 on selecting management units and sites for evaluations?
Certificate holder	<b>CH overall (average)</b>	93,06
	CH (Africa)	-
	CH (Europe)	91,67
	CH (Latin America)	100,00
	CH (North America)	87,50
Certification body/auditor	<b>Certification body / auditor</b>	91,67
Consultant	<b>Consultant overall (average)</b>	87,50
FSC Network Partner staff	<b>FSC NP overall (average)</b>	68,75
FSC Member per region	<b>Member (region) overall (average)</b>	82,50
	FSC Member (Africa)	75,00

FSC Member per sub-chamber	FSC Member (Europe)	55,00
	FSC Member (Latin America)	100,00
	FSC Member (North America)	100,00
	<b>Member (chamber) overall (average)</b>	<b>64,83</b>
	Economic North	79,17
	Economic South	95,00
	Environmental North	0,00
	Environmental South	75,00
Non-member	Social North	75,00
	Social South	100,00
<b>Non-member</b>	<b>Not an FSC member</b>	<b>87,50</b>

Participant type	Region / Sub-chamber	Question 20. Do you agree with the proposed new requirements on the sampling of contractors by certification bodies?
Certificate holder	<b>CH overall (average)</b>	<b>68,75</b>
	CH (Africa)	-
	CH (Europe)	68,75
	CH (Latin America)	50,00
	CH (North America)	87,50
Certification body/auditor	<b>Certification body / auditor</b>	<b>87,50</b>
Consultant	<b>Consultant overall (average)</b>	<b>87,50</b>
FSC Network Partner staff	<b>FSC NP overall (average)</b>	<b>62,50</b>
FSC Member per region	<b>Member (region) overall (average)</b>	<b>81,25</b>
	FSC Member (Africa)	50,00
	FSC Member (Europe)	75,00
	FSC Member (Latin America)	100,00
	FSC Member (North America)	100,00
FSC Member per sub-chamber	<b>Member (chamber) overall (average)</b>	<b>79,38</b>
	Economic North	76,92
	Economic South	70,00
	Environmental North	75,00
	Environmental South	75,00
	Social North	100,00
	Social South	100,00
<b>Non-member</b>	<b>Not an FSC member</b>	<b>76,56</b>

### c) Qualitative results

**Question 19. Do you have any recommendations for improvement of section 8?**

## Details of qualitative results analysis:

Stakeholder/Membership feedback	PSU comment
<ul style="list-style-type: none"> <li>→ Improvement recommendations to sub-clauses 8.1.1, 8.8.1 and 8.8.2</li> <li>→ Confusion related to possibilities related to SLIMF remote auditing</li> <li>→ Clauses 8.2, 8.8, sub-clauses 8.2.2, 8.2.3, 8.2.4, 8.3.4, 8.4 and 8.5.3 required for clarification, sub-clauses 8.3.1, 8.4.3, 8.4.4, 8.5.5 and 8.7.4</li> <li>→ Sub-clause 8.5.5 leading to credibility issues (Sampling with RMUs)</li> <li>→ Multiple MU sampling formula said to be result in too low sample rates</li> <li>→ Include new sampling criteria: "time as group member" (&lt;1y, 2-5y, &gt;5y)</li> <li>→ Concerns raised about section 8 being very much unchanged from draft 1.0</li> <li>→ Active MU sampling should be increased (or evidence that points that this is not needed)</li> <li>→ Sampling table 1 and 2 are left unchanged - going against the objective of the revision</li> <li>→ Very low minimum MU sample for groups (further decreased in the absence of HCVs and tenure disputes). Needs analysis and justification</li> <li>→ How much would sub-clauses 8.3.3 and 8.5.6 impact the sample size determination? If not much, the default minimum needs to be increased</li> <li>→ Section 8 structure has weakened since the draft 1.0. Unclear which requirements apply to groups, which to multiple MUs</li> <li>→ Inconsistencies in rounding - tables apply a note about rounding, formulas in text do not</li> <li>→ Examples about sampling would be welcomed</li> </ul>	<p>Many of the suggestions have been incorporated into the draft standard. Section 8 has been significantly revised to improve understanding and remove redundancies in the requirements. However, the basic concepts have been maintained. The TWG discussed possibilities to redesign the sampling requirements but decided to maintain the current approach and work on the aspects that are relevant to improve clarity and consistency in the application of the requirements by CBs.</p>



→ Unclear about terminology (evaluation - what does it entail in the body of the text?)

**Question 21. Do you have any comments or recommendations for the improvement of the requirements on the sampling of contractors by certification bodies?**

**Details of qualitative results analysis:**

Stakeholder/Membership feedback	PSU comment
<p>→ Provide a definition for contractors</p> <p>→ Sub-clause 8.7.4 should be better structured as it could lead to an empty requirement</p> <p>→ Why should the inclusion of contractors into the scope of FM groups increase the sampling size by CBs?</p> <p>→ Why is each contractor audited at least once per certification cycle?</p> <p>→ 8.7 needs clarification that it only applies to FM groups and contractors that have been included into the scope of certificates</p>	<p>The stakeholder feedback on this topic has been considered by the TWG that decided to maintain the sampling requirements for contractors and improve the requirements for an easier understanding (e.g., explanation that the requirements only apply to the contractors included in the scope of group certification).</p>

## ANNEX 4. Forest evaluation reports and public reports

### a) Questions posted during public consultation

Q22. Do you agree with the proposed timelines for the submission of reports and public summaries?

Q23. Do you agree with the proposed reporting requirements in Annex 4 of the standard?

Q24. Do you have any suggestions for the improvement of the reporting requirements?

### b) Quantitative results

Participant type	Region / Sub-chamber	Question 22. Do you agree with the proposed timelines for the submission of reports and public summaries?
Certificate holder	CH overall (average)	91,67
	CH (Africa)	-
	CH (Europe)	75,00
	CH (Latin America)	100,00



	CH (North America)	100,00
<b>Certification body/auditor</b>	<b>Certification body / auditor</b>	<b>86,54</b>
<b>Consultant</b>	<b>Consultant overall (average)</b>	<b>75,00</b>
<b>FSC Network Partner staff</b>	<b>FSC NP overall (average)</b>	<b>87,50</b>
<b>FSC Member per region</b>	<b>Member (region) overall (average)</b>	<b>90,00</b>
	FSC Member (Africa)	100,00
	FSC Member (Europe)	60,00
	FSC Member (Latin America)	100,00
	FSC Member (North America)	100,00
<b>FSC Member per sub-chamber</b>	<b>Member (chamber) overall (average)</b>	<b>79,42</b>
	Economic North	77,08
	Economic South	95,00
	Environmental North	50,00
	Environmental South	100,00
	Social North	75,00
	Social South	75,00
<b>Non-member</b>	<b>Not an FSC member</b>	<b>75,00</b>

<b>Participant type</b>	<b>Region / Sub-chamber</b>	<b>Question 23. Do you agree with the proposed reporting requirements in Annex 4 of the standard?</b>
<b>Certificate holder</b>	<b>CH overall (average)</b>	<b>100,00</b>
	CH (Africa)	-
	CH (Europe)	100,00
	CH (Latin America)	100,00
	CH (North America)	100,00
<b>Certification body/auditor</b>	<b>Certification body / auditor</b>	<b>84,09</b>
<b>Consultant</b>	<b>Consultant overall (average)</b>	<b>75,00</b>
<b>FSC Network Partner staff</b>	<b>FSC NP overall (average)</b>	<b>81,25</b>
<b>FSC Member per region</b>	<b>Member (region) overall (average)</b>	<b>90,63</b>
	FSC Member (Africa)	87,50
	FSC Member (Europe)	75,00
	FSC Member (Latin America)	100,00
	FSC Member (North America)	100,00
<b>FSC Member per sub-chamber</b>	<b>Member (chamber) overall (average)</b>	<b>77,18</b>
	Economic North	90,91
	Economic South	95,00
	Environmental North	25,00
	Environmental South	75,00
	Social North	100,00
	Social South	100,00
<b>Non-member</b>	<b>Not an FSC member</b>	<b>79,69</b>

### c) Qualitative results

## Question 24. Do you have any suggestions for the improvement of the reporting requirements?

Details of qualitative results analysis:	
Stakeholder/Membership feedback	PSU comment
<ul style="list-style-type: none"><li>→ INT-STD-20-007b_03 application requested</li><li>→ 12-month submission deadline for final report too long</li><li>→ Clause 17.2 -&gt; the report is needed at least in English</li><li>→ Clause 18.2 -&gt; the public summary needed in the official language of the country in any case</li><li>→ 90 days is too long for standard audit report</li><li>→ Changes in data (e.g., number of contractors) could prove problematic for reporting</li><li>→ Several requests for improvement with regards to the evaluation reports and contents of the public summary from one particular stakeholder:<ul style="list-style-type: none"><li>- Reduction of timelines for publication of public summaries</li><li>- Include a summary of FM plan into public summaries</li><li>- Add following information: person days, sampling details, rationale for the selection of Mus for evaluation, complaints details, number of group members, sampling of group members by the organization, changes to risk designations, issues that were hard to access, situations where stakeholders alleged a non-conformity but the CB came up with a positive assessment of the organization.</li></ul></li></ul>	<p>The stakeholder feedback regarding timelines and language of reports have been considered by the TWG and FSC. In addition, the requirements have been revised. One specific stakeholder provided significant comments and suggestions for improving reporting requirements, these have been considered by the TWG, and partially implemented in the reporting requirements.</p>

## SLIMF and Community Forests

### a) Questions posted during public consultation

Q25. Do you agree with the current SLIMF requirements in FSC-STD-20-007 V4-0 D2-0?

Q26. Do you have any suggestions for the improvement of the SLIMF requirements in FSC-STD-20-007 V4-0 D2-0?

Q27. In your opinion, which of the alternatives below is more appropriate for the evaluation of community forests in FSC-STD-20-007?

Q 28. Do you agree that the streamlined CIP evaluation requirements continue to apply to SLIMF and community forests even after the first certification cycle (i.e., from the 6th year of certification onwards)?

Q29. Please clarify, what should be improved and why?

## b) Quantitative results

Participant type	Region / Sub-chamber	Question 25. Do you agree with the current SLIMF requirements in FSC-STD-20-007 V4-0 D2-0?
Certificate holder	<b>CH overall (average)</b>	85,42
	CH (Africa)	-
	CH (Europe)	68,75
	CH (Latin America)	100,00
	CH (North America)	87,50
Certification body/auditor	<b>Certification body / auditor</b>	89,58
Consultant	<b>Consultant overall (average)</b>	56,25
FSC Network Partner staff	<b>FSC NP overall (average)</b>	66,67
FSC Member per region	<b>Member (region) overall (average)</b>	90,63
	FSC Member (Africa)	87,50
	FSC Member (Europe)	75,00
	FSC Member (Latin America)	100,00
	FSC Member (North America)	100,00
FSC Member per sub-chamber	<b>Member (chamber) overall (average)</b>	85,96
	Economic North	78,85
	Economic South	90,00
	Environmental North	-
	Environmental South	100,00
	Social North	75,00
	Social South	75,00
Non-member	<b>Not an FSC member</b>	81,67

Participant type	Region / Sub-chamber	Question 27. In your opinion, which of the alternatives below is more appropriate for the evaluation of community forests in FSC-STD-20-007?		
		Option 1	Option 2	Option 3
Certificate holder	<b>CH overall (average)</b>	38%	50%	0%
	CH (Africa)	0,00	0,00	0,00
	CH (Europe)	2,00	2,00	0,00
	CH (Latin America)	0,00	1,00	0,00
	CH (North America)	1,00	1,00	0,00
Certification body/auditor	<b>Certification body / auditor</b>	8%	75%	17%
Consultant	<b>Consultant overall (average)</b>	33%	67%	0%
FSC Network Partner staff	<b>FSC NP overall (average)</b>	0%	50%	50%
FSC Member per region	<b>Member (region) overall (average)</b>	14%	86%	0%
	FSC Member (Africa)	1,00	1,00	0,00

FSC Member per sub-chamber	FSC Member (Europe)	0,00	3,00	0,00
	FSC Member (Latin America)	0,00	1,00	0,00
	FSC Member (North America)	0,00	1,00	0,00
	<b>Member (chamber) overall (average)</b>	<b>18%</b>	<b>77%</b>	<b>5%</b>
	Economic North	0,33	0,67	0,00
	Economic South	0,40	0,40	0,20
	Environmental North	-	-	-
	Environmental South	-	-	-
	Social North	0,00	1,00	0,00
	Social South	0,00	1,00	0,00
<b>Non-member</b>	<b>Not an FSC member</b>	<b>7%</b>	<b>64%</b>	<b>29%</b>

Participant type	Region / Sub-chamber	Question 28. Do you agree that the streamlined CIP evaluation requirements continue to apply to SLIMF and community forests even after the first certification cycle (i.e., from the 6th year of certification onwards)?
Certificate holder	<b>CH overall (average)</b>	<b>66,67</b>
	CH (Africa)	-
	CH (Europe)	75,00
	CH (Latin America)	75,00
	CH (North America)	50,00
Certification body/auditor	<b>Certification body / auditor</b>	<b>38,64</b>
Consultant	<b>Consultant overall (average)</b>	<b>75,00</b>
FSC Network Partner staff	<b>FSC NP overall (average)</b>	<b>75,00</b>
FSC Member per region	<b>Member (region) overall (average)</b>	<b>79,17</b>
	FSC Member (Africa)	50,00
	FSC Member (Europe)	91,67
	FSC Member (Latin America)	75,00
	FSC Member (North America)	100,00
FSC Member per sub-chamber	<b>Member (chamber) overall (average)</b>	<b>73,19</b>
	Economic North	64,58
	Economic South	80,00
	Environmental North	-
	Environmental South	-
	Social North	75,00
	Social South	75,00
<b>Non-member</b>	<b>Not an FSC member</b>	<b>42,31</b>

### c) Qualitative results

**Question 26. Do you have any suggestions for the improvement of the SLIMF requirements in FSC-STD-20-007 V4-0 D2-0?**

Details of qualitative results analysis:	
Stakeholder/Membership feedback	PSU comment
<ul style="list-style-type: none"> <li>→ FM Groups: Surveillance only for active MUs</li> <li>→ RMU sampling: too low</li> <li>→ One on-site audit per 5 years for SLIMF is risky</li> <li>→ Communities to be evaluated as 'normal' MUs</li> <li>→ Rules for FM evaluations should be same for all MUs</li> <li>→ Primary and secondary production facilities should be reinstated for SLIMF</li> </ul>	<p>The stakeholder feedback about SLIMF has been discussed by the TWG and concluded that the current SLIMF requirements should be maintained, and that the sampling intensity should not be increased. The TWG also recommended the extension of the SLIMF requirements to community forests. The topic of primary and secondary processing facilities has already been addressed in question 7 above.</p>

**Question 29. Please clarify, what should be improved and why?**

Details of qualitative results analysis:	
Stakeholder/Membership feedback	PSU comment
<ul style="list-style-type: none"> <li>→ Suggestion to merge some important Principles for FM audits, such as 1, 2, 4, 6, 7 and 8 for next cycle audits</li> <li>→ CIP accreditation requirements should have a time span of 1 or 2 certification cycles</li> <li>→ Community forests should not be equal to SLIMF - there is a great range in intensity and scale of operations</li> <li>→ After initial 5 y period, Comm. and SLIMF should meet relevant requirements</li> </ul>	<p>The TWG discussed the stakeholder's feedback on this topic and concluded that the approach taken in the CIP should be extended to FSC-STD-20-007 to align the two normative documents and ensure a smooth transition for community forests certified according to the CIP to evaluations against FSC-STD-20-007 after the initial five (5) years of certification. The concerns of having large and well-structured community forests cannot be resolved in FSC-STD-20-007, but this is being addressed in the definition of community forests which is the subject of the ongoing revision of the FSC-STD-01-003 SLIMF Eligibility Criteria. Once the new definition is approved, the FSC-PRO-30-011 Continuous Improvement Procedure and</p>

→ Streamlined CIP evaluation requirements are redundant

FSC-STD-20-007 Forest management evaluations will adopt it.

## General Feedback

### a) Questions posted during public consultation

Q30. How much do you agree with this draft overall?

Q31. Do you have any other feedback about the revised Draft 2-0? Please specify the section and (if applicable) the clause you are referring to.

### b) Quantitative results

Participant type	Region / Sub-chamber	Q30 - How much do you agree with this draft overall?
Certificate holder	<b>CH overall (average)</b>	77,08
	CH (Africa)	-
	CH (Europe)	68,75
	CH (Latin America)	75,00
	CH (North America)	87,50
Certification body/auditor	<b>Certification body / auditor</b>	65,91
Consultant	<b>Consultant overall (average)</b>	62,50
FSC Network Partner staff	<b>FSC NP overall (average)</b>	71,88
FSC Member per region	<b>Member (region) overall (average)</b>	83,13
	FSC Member (Africa)	87,50
	FSC Member (Europe)	70,00
	FSC Member (Latin America)	75,00
	FSC Member (North America)	100,00
FSC Member per sub-chamber	<b>Member (chamber) overall (average)</b>	80,87
	Economic North	73,08
	Economic South	81,25
	Environmental North	50,00
	Environmental South	100,00
	Social North	100,00
	Social South	75,00
Non-member	<b>Not an FSC member</b>	65,63

### c) Qualitative results

Question 31. Do you have any other feedback about the revised Draft 2-0? Please specify the section and (if applicable) the clause you are referring to.

## Details of qualitative results analysis:

Stakeholder/Membership feedback	PSU comment
<p>Section 2:</p> <p>→ 2.1. needs clarification</p> <p>→ 2.2. "Preparation for the evaluation" should be replaced by "prior to the evaluation"</p> <p>Section 3:</p> <p>→ 3.2 There should be a requirement that forces CBs to change the low risk designation if they come across evidence that indicates a risk</p> <p>→ 3.5 The change in risk designation should be justified in the public summary</p> <p>Section 4:</p> <p>→ Clause 4.2: The standard shall include criteria for the justification of audit time in person</p> <p>Section 6:</p> <p>→ Pre-evaluation requirements for MU doesn't address how this applies to group multiple MU certs</p> <p>→ Clause 6.2/6.3: In the previous version, this sentence was very valuable: "A targeted evaluation of Principle 9 shall be accompanied with a targeted stakeholder consultation." Why do you remove this possibility?</p> <p>Section 7:</p> <p>→ Clause 7.2a: correct the reference</p> <p>Section 8:</p> <p>→ Sub-section 8.3 -&gt; include a clause for active MU sampling or revise the sub-section name</p>	<p>Section 2: The comments have been incorporated into the draft.</p> <p>Section 3: CBs are required to consider evidence of risk and adapt the risk designations accordingly. The changes in risk designations from specified-risk to undesignated risk or, from undesignated risk to low-risk shall be registered in the public summary.</p> <p>Section 4: The justification for the determination of the audit time shall be included in the public summaries.</p> <p>Section 6: The rules around pre-evaluations allow already enough flexibility for the CBs to design an effective pre-evaluation.</p> <p>Section 7: The reference has been corrected.</p> <p>Section 8: The section has been revised accordingly.</p> <p>Section 9: The draft has been revised to clarify that pre-evaluations cannot be done remotely.</p> <p>Section 10: The sampling requirements have been revised.</p> <p>The term "point of sale" has been added to the draft.</p> <p>A clause has been added to specify how "undesignated risk" shall be evaluated.</p> <p>Section 11: The clause 11.5 already provides a possibility for the CB to react to national "hot" issues in the absence of an NFSS Risk Assessments. Additionally, C11.6 addresses those international concerns and risks that need to be evaluated on an annual basis.</p> <p>Section 12: A new clause has been added to the draft to explain the procedures for certification renewal after termination or withdrawal.</p>



#### Section 9:

→ It is not clear whether or not pre-evaluations can be conducted remotely

→ Clause 9.4: add "main" before "evaluation report"

#### Section 10:

→ Sub-clause 10.1.2: (and 11.3 and 12.3) also includes a notion of having evidence of non-conformity that needs to be evaluated by the CB against low-risk requirements

→ Sub-clause 10.1.4: it is clear SLIMF can be evaluated as a group of like MUs, but it doesn't say anywhere in the standard that non-SLIMF MUs have to be audited against all requirements (it is implied here)

→ Sub-clause 10.2.4: Consider changing the term from forest gate to point of sale

→ Improve the way unspecified risk auditing (frequency and overall approach) is done - also applies to other sections

#### Section 11:

→ Clause 11.5: To be aligned with European policy about imported deforestation

→ Clause 11.5: similar to comment at section 6, it is unclear how this applies to groups or multiple MU--would these mandatory criteria only need to be audited for some MU or for the whole certificate?

→ Clause 11.6: Currently not as intended by RBA-TWG

→ Clause 11.7: vocabulary issue as clause 11.5 doesn't mention the notion of "specified risk". Additionally, the impact of this clause on the alignment of FSC certification with the European policy on imported deforestation should be analyzed (maybe C6.9 and C6.10 should be audited regardless of the 11.5 thresholds).

→ Clauses 11.7 and 11.4 are duplicative

#### Section 12:

→ Clause 12.1: It should be clarified, if a certificate is terminated or withdrawn, how long until a new ME is required

→ Clause 12.2 d. the word "same" seems to be missing

#### Section 13:

→ Section 13: Conflicts between laws and regulations is significantly expanded, although they are rare. This creates additional workload

→ Clause 13.3 There should be a timetable for the implementation: How long between identification of conflict and reporting to FSC? How long before the conflict is judged not solvable and NCs have to be issued?

Section 13: The section about conflicts between laws, regulations and FSC requirements has been expanded for improved clarity and is not intended to increase the workload of CBs. This is a section that will be sporadically applied and is relevant for the system credibility. For this reason, is being maintained.

Section 15: Section 15 provides requirements that are linked to FSC-STD-20-001 and that are relevant for the system's credibility. For this reason, this section has not undergone changes in the requirements regarding the non-conformities and corrective action requests.

Others/General Feedback: The feedback regarding full and hybrid remote auditing have not been implemented since the TWG decided to limit the use of full remote audits to SLIMF and community forests and because the revised draft does not allow the hybrid audits with the use of local facilitators in FM evaluations.



#### Section 15:

- Clause 15.3: Revision request: repeated minor conformities on the same indicator/criteria over a 5 to 10y period surely indicate a higher risk of NC, and this should be treated through RBA when possible (designation as specified risk) or otherwise (escalating to major NC?)
- Clause 15.6: 'root cause' approach needs improvement or complete revision
- Clause 15.7: align with 20-001 - include a reference

#### Others / General feedback:

- Need to have a clear requirement for CB audit teams to identify all NCs that the audit team come across
- Extended remote audit should only apply to SLIMF
- Limiting factors to remote auditing proposed
- There might be a problem finding qualified local experts to support hybrid audits
- Please take into consideration that CBs don't inform about the exact date of audits, and it is create misunderstanding and lack of confidence from SHs
- Fundamental failure concept needs revision



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