



Report

SYNOPSIS REPORT

Results of the focused consultation on the draft IGIs for the
Criteria 6.9, 6.10 and 6.11



Title: Synopsis Report: Results of the focused consultation on the draft IGI for the Criteria 6.9, 6.10 and 6.11

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INTRODUCTION

Statutory Motion 37/2021: *Required changes to the FSC Principles and Criteria to implement the Policy to Address Conversion*, which was passed in the General Assembly 2022, required changes to the Principles and Criteria to make the Policy to Address Conversion implementable. Therefore Criteria 6.9 and 6.10 are now being updated, and a new Criterion 6.11 is being added to the Principles and Criteria.

These changes require also correspondingly revised and added International Generic Indicators (IGI) which PSU has drafted for that purpose in January 2023.

The update of the IGIs has been conducted according to <[FSC-PRO-01-001 The Development and Revision of FSC Requirements](#)>, Section 12, with a focused consultation. The draft IGIs were submitted for feedback to FSC's Director General, the Policy and Standards Committee, PSU's Forest Stewardship Standards (FSS) team, and the Forest Management Community from 31 January to 16 February 2023.

This report presents the feedback received and an indication of how the comments have been taken into account in the final draft of the IGIs to the Criteria 6.9, 6.10 and 6.11.

FEEDBACK IN NUMBERS

A total of 22 comments were received from the following four respondents:

Director General	1 comment
Policy and Standards Committee	4 comments
PSU's FSS Team	15 comments
Forest Management Community	2 comments

CONCLUSIONS

- The majority of the comments were suggestions to make the language clearer, and the document has been revised accordingly.
- The most relevant content related change addressed the “transformation” of plantations, which have been directly converted from natural forests (Criterion 6.9). The Instructions for Standard Developers and the IGI 6.9.1 were revised to clarify that the conditions a), b) and c) are also applicable for the “transformation” of those plantations.
- Addressing the concept of ‘Very limited portion’ remains difficult because there is no hectareage threshold yet. This hectare limit will be addressed through and advice note.

1. Comments and responses

Comments	Addressing the comment
The approach makes total sense, and the document looks good to me.	No action needed
6.9 Instructions for Standard Developers: Use the words "applicable for" in place of "targeted to".	Revised as requested
6.10 Instructions for Standard Developers: Clarify what "does not apply". In this case, it is conformance with the Remedy Framework.	Revised as requested
IGI 6.10.2 '....are not certified, ...':	This language cannot be changed because it is not in the scope of the alignment process.
IGI 6.11.2 point 1) 'Affects a very limited' Tense doesn't match above criteria.	Tense revised as requested
<p>Criterion 6.9: ...Are a), b) and c) also applicable for the "transformation" of plantations to non-forest land use (the plantations that are found on sites directly converted from natural forests)?</p> <p>The way it is now, I think I could understand, a), b) and c), only apply for the cases in the first part of the sentence of the criterion, where "conversion" is used to describe these: "<i>The Organization* shall* not convert <u>natural forest*</u> or HCV* areas to plantations* or to non-forest land use,...</i>" but I could think that a), b) and c) are not applicable when "transforming" the plantations to non-forest land use, as we do not call this a "conversion" but a "transformation".</p>	<p>Yes, points a), b) and c) are also applicable for the "transformation" of plantations to non-forest land use, when the plantations were directly converted from natural forests.</p> <p>We added some clarity to the Instructions and slightly modified the IGI 6.9.1</p>
Criterion 6.9: ...How we define transformation? Why we do not define it? Is transformation in this context the same as conversion?	<p>Conversion has a fixed definition, which does not cover plantations. That's why we are using 'transformation' instead of conversion for the plantations.</p> <p>In a situation when there is no definition for a certain term, Oxford dictionary applies.</p> <p>An FSC specific definition should be developed in the full revision of IGIs.</p>

Criterion 6.9: ...I see in the definition below of conversion it says "The definition of <i>conversion</i> * covers gradual forest <i>degradation</i> * as well as rapid forest transformation ", which brings a specific type of forest transformation but not plantation transformation.	Correct. As indicated above, we are using transformation as a generic term.
Criterion 6.9 Term "additional" appears in other parts of this file and it is implying "additional benefits in the Management Unit" when one reads the sentences where it appears. But is not explicitly mentioned in the terms and definitions below, instead one find "additionality" with two different cases.	Valid point. The challenge is that the term "additional" is used in 17 occasions in the original IGI document, having a generic meaning without a definition.
I find confusing whenever the specific term here marked with asterisks does not appear in the section and definitions in the same way it is here written. I would support keeping the same term in the section below on terms and definitions to avoid any confusion.	Now that the definition for additionality was delivered in PAC, we have added it into the updated Glossary of IGIs. To avoid confusions, we have now indicated in the Glossary that " <i>additional</i> *" refers to Additionality, when it is laid out with asterisk
Criterion 6.9 Is "long-term*" term not here below defined because we are not changing anything from the current definition? - Also for "conservation*" right?	True, 'Long-term' and 'Conservation' are already defined in the IGI document and definitions are not changed
Criterion 6.9, Instructions for Standard Developers: ...we use "converted" (see red font) to refer to what the criterion 6.9 calls "transform".	Correct. We have revised the language accordingly
Criterion 6.9, Instructions for Standard Developers: Is this last paragraph part of the instructions? I would propose that the format at the end is the same as per the section it belongs to (grey font if it is an instruction note). Does it apply to also in the context of the 6.9 criterion itself?	Yes, the last paragraph is part of the instructions and we have changed the font. Also, the paragraph applies to the entire context, and we have revised the reference accordingly
IGI 6.9.1 I can detect that this draft has a revised definition for the term <i>HCV areas</i> *, but the glossary marks where "hcv areas" or "high conservation value areas" is written is not consistent (see red font, as examples).	Actually, the definition for HCV Areas has not changed. We have deleted it out of this document, because it is already available in the IGI document.
This asterisk does not appear in the text of the criterion 6.9, we also do not have a single term and definition for "area". We need to be careful as we do have a definition of "HCV" alone besides the "HCV area" definition, and we do not have definition for "area".	The Note under the definition of HCV is coming

from PAC and that is why we added the entire definition in here.

It is correct that indicating *HCV* areas** with two asterisks may be confusing and we have edited the document accordingly

Criterion 6.10 b) Here "restitution" is used for social harms, and "remedy" for environmental harms, but

1) in the definition of "remedy" below, there is a subsection that refers to "remedy for social harms" and in the definition of "restitution" it is mentioned restoration of natural resources etc.

2) moreover, I do not see here any mention to "remedy of social harms" in the IGI nor criteria in this file. But I do see, "restitution of social harms and environmental harms" somewhere in this file.

Could it be that the Term is switched or something is wrong in the section of "Terms and definitions"?

We should leave clear and consistent when "remedy" is used and when "restitution" is used, at least for which type of "harm" each term applies.

If we never use "remedy" for social harms in the IGI or Criteria, then why defining it in the definition?

We should better focus on defining "restitution" for "social harms" and for "environmental harms", if there is any difference or if it makes sense.

These definitions are taken from the PAC and we cannot change them at this stage any more.

The remedy of social harms steps in with the Remedy Framework, which is frequently using a term 'social remedy', which may include restoration of HCV5 areas or other natural resources.

The expression of "restitution of social harms and environmental harms" In the 6.10 Instructions for Standard Developers is not good and we have replaced 'restitution' with 'remedy'

Criterion 6.10 Instructions for Standard Developers: I believe the format in which other normative documents will be referenced will be updated before publication? I remember they were mentioning in the Draft Salon that now we write the title of the normative document between <> and not in italics.

Correct, the same information is presented at page 23 of <FSC Editorial Style Guide> and we have revised the document accordingly

IGI 6.10.2 The word "smallholder" is here split, but in the terms and definitions below it is together.

Correct, we have revised the document accordingly

Criterion 6.11 Instructions for Standard Developers: Last sentence: ...of the MU? To complete the idea

The "sum" gives the idea of several MUs' very limited portions. I am not sure here if that is the intention, because I am not super informed on this, but please consider to complete this sentence to clarify which proportion this sentence is referring to.

We have added that "very limited portion*" refers to the MU

Definition of Additionality: The word we are working with in FSS team is "FSC Forest Stewardship Standards (FSS)" or if you also mean CoC standard?	This refers to FSS and Controlled Wood
Definition of Remedy: I bet you have discussed this so many times, but please consider to define what is "Original state" or refer to something that is in more connection to the second part of this definition, for example: "immediate previous state or condition" before the intervention that caused <i>social harm</i> * and <i>environmental harm</i> * to an area.	The Remedy Framework addresses the concept "Original state" through comprehensive Baseline Assessments
Definition of Restitution: Maybe I am overlooking something but I cannot find the definition for "equivalent" in the FSC-STD-01-002 (https://connect.fsc.org/document-centre/documents/resource/207) nor here. Could we put this definition somewhere here or add the reference where this definition is found?	We have added the definition of "equivalent". It is available in PAC.
Regarding to the definition of small-scale smallholder, I would like to confirm if we have a threshold for the word "most" and "mostly", more than 50% or 80%? It would be easy to identify whether the smallholder could be exempt from remedy framework. It is very important for the whole conversion policy's implementation in Asia. As most of the smallholders own less than 50 ha land, they comply with the threshold of area. But for the other two restrictions, the first one is "most of their livelihood" can I regard more than 50% as most of their livelihood? There is another scenario, if a person that is depending on the land for only 10%, but they could not live without the amount of 10% income. Could this 10% also be considered as most of their livelihood? And the second one is "employs labor mostly from family or neighboring communities", the same as "most", can I regarding more than 50% labors from family or neighboring communities as small-scale smallholder?	<p>In this context, "<u>most</u> of their livelihoods" and "employs labor <u>mostly</u>" means more than 50%.</p> <p>The scenario, where a person is depending on the land for only 10%, but could not live without the amount of 10% income, falls outside the current definition of small-scale smallholder.</p> <p>At the current stage, we can not change the definition anymore.</p>
As we have the threshold of vast majority under Principle 9 as below: Vast majority: 80% of the total area of Intact Forest Landscapes* within the Management Unit* as of January 1, 2017. The vast majority* also meets or exceeds the minimum definition of Intact Forest Landscape*. So I hope we could also have the threshold under the definition of small-scale smallholder. I also making comments in the attached Word document.	
Under the criterion 6.11, the order number is wrong	We have revised the numbering



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