



# SYNOPSIS OF 2ND CONSULTATION COMMENTS

The second draft of FSC-STD-30-010, Controlled Forest  
Management

20/07/2023



## FOREWORD

FSC-STD-30-010 Controlled Forest Management specifies the requirements applicable at the management unit (MU) level for persons or entities (hereafter referred to as 'The Organization') wishing to demonstrate to a third-party certification body or a business partner that the products supplied from that MU is controlled to avoid the supply of products that are illegally harvested, harvested in violation of traditional and human rights, harvested in MUs in which High Conservation Values are threatened by management activities, harvested in areas in which forests are being converted to plantations or non-forest use or harvested from forests in which genetically modified trees are planted.

The revision of this standard was triggered by the 'Strategy for FSC Mix products and Controlled Wood' published in 2019. This strategy aims to reduce reliance of the FSC system on all forms of Controlled Wood and enable FSC-STD-30-010 V3-0 Controlled Forest Management standard as a step towards full forest management certification.

The first draft of the standard was developed in collaboration with and input from a chamber balanced working group and underwent public consultation from mid-October 2022 to mid-December 2022. After detailed analysis of the feedbacks received during the first consultation, the second draft was prepared and shared with the stakeholders for their feedback from 24<sup>th</sup> of April till 24<sup>th</sup> of June 2023. This synopsis report serves two purposes. First, to share the analysis of feedback received during the second consultation and compare it with the first one, and second, to show how the feedback influenced the final draft of the standard.

The FSC team and the working group would like to thank all participants of the 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 Chain of custody programme, at [chainofcustody@fsc.org](mailto:chainofcustody@fsc.org).

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## OUTREACH ACTIVITIES FOR THE 2<sup>ND</sup> CONSULTATION

Throughout the consultation period, comprehensive range of outreach activities were undertaken to actively engage stakeholders and encourage their participation. These activities included:

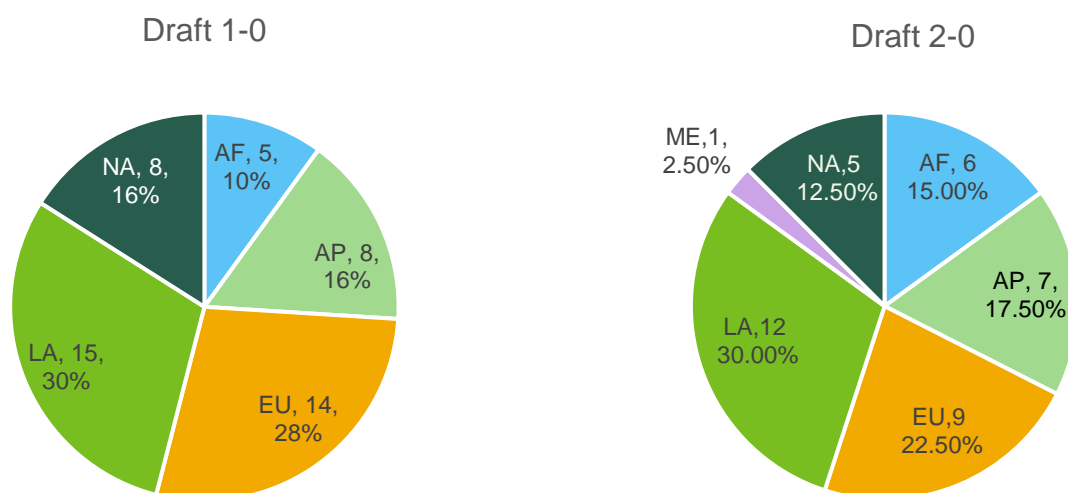
- **Public webinars:** two public webinars were held in English and with simultaneous interpretation Spanish. in which a total of 50 people registered and 40 attended. To accommodate stakeholders from various regions, the webinars were scheduled with a three-week interval and held at different times to suit participants from both the western and eastern hemispheres
- **Communications:** News items about the consultation were shared across multiple platforms, targeting various stakeholder groups. These various platforms were CB Forum, Members' Portal, Newsletters, FSC website (Intranet and public) and MS Team's channels (OneFSC Global).
- **Reaching out to CW-FM certificate holders:** Specialized outreach was made to invite all CW-FM certificate holders to a tailor-made webinar, designed to provide comprehensive insights into the changes present in the new version and its potential impacts on them. However, due to limited participation, interested certificate holders were offered the opportunity to join the second public generic webinar.

In summary, 40 stakeholders responded through the Consultation Platform, which are described as follows:

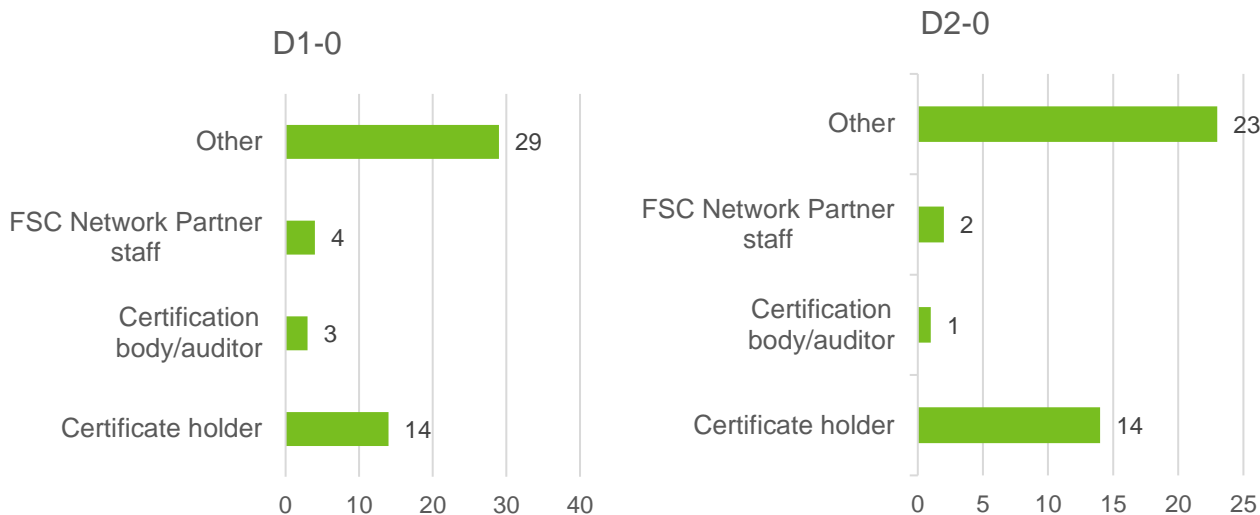
## BREAKDOWN OF PARTICIPANTS FROM FIRST AND SECOND CONSULTATION

During the second consultation, a total of 40 people provided their feedback in writing, which is slightly less than first consultation, when 51 people responded. This section gives a thorough description of the participants in both consultations.

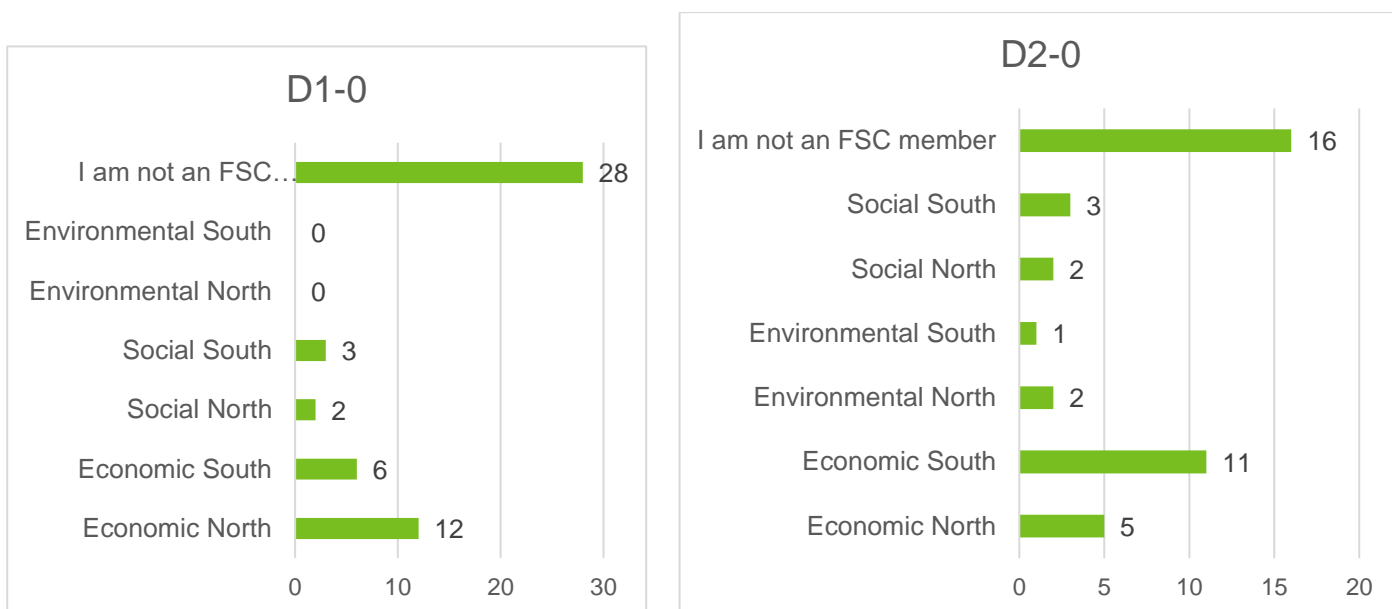
In the second consultation, 35% of the total participants represented global north while 65% represented global south. Noteworthy that in the first consultation, a more balanced participation was observed. 56% from global south and 44% from global north out of 51 participants.



Similar to first consultation, majority (23) of respondents continued to be classified under the “Other” category encompassing FSC members, consultants, ASI staff and FSC international staff. Subsequently, the second-largest group of respondents belonged to certificate holders’ category (14) which remained consistent in both consultations. The rest of respondents were from FSC network partners and certification bodies.



During the second consultation, a notable increased involvement from the FSC members was observed when compared to the first consultation, with 60% of this category whereas in previous consultation the ratio was 52%. Furthermore, unlike previous consultation, participation from both environmental sub-chambers was gained (Environmental south and Environmental north). Additionally, there was an increased number of participants from social chamber among respondents.



## METHODOLOGY

In the second public consultation, five key topics from the standard were surveyed. The topics were presented in a closed question followed by an open question. Respondents were asked to indicate their 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”). Following the closed question, an open question was posed, asking the respondent to provide their rationale (i.e., “please briefly explain your rationale”) to elaborate their viewpoint.

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 standardise the findings. Findings were also grouped into “positive reception” (Likert scales: strongly agree, agree, and neutral) and “negative reception” (Likert scales: disagree and strongly disagree). Special attention was given into studying the answers with a low “positive reception” through the qualitative analysis.

In the qualitative analysis, key messages were identified across all answers. However, they were more prominent for the ‘negative reception’ group since it was less likely that respondents provide feedback on topics that they had ‘positive reception’ towards. Therefore, while reviewing the qualitative analysis it should be noted that they don’t represent the viewpoint of all respondents.

These results were carefully considered and analysed by FSC Performance and Standards Unit (PSU) and the chamber balanced working group while preparing the final draft of the standard.

## OVERVIEW OF THE STAKEHOLDERS' RECEPTION TO PROPOSED CHANGES

The figures in this section indicate an overall trend of agreement and in the second consultation and provide a comparison between the first consultation and the second one. It is noteworthy 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	Negative reception = Disagree + strongly disagree	Level of agreement from D1-0
<b>Q1</b> with the requirements in Quality Management System?	<b><u>81%</u></b>	19%	n.a
<b>Q3</b> with the Criteria and Indicators included under Controlled Wood category 1 "Illegally harvested wood"?	<b><u>94%</u></b>	6%	85%
<b>Q5</b> with the Criteria and Indicators included under Controlled Wood category 2 "Wood harvested in violation of traditional and civil rights"?	<b><u>90%</u></b>	10%	61%
<b>Q7</b> with the Criteria and Indicators included under Controlled Wood Category 3 "Wood harvested in forests in which High Conservation Values are threatened by management activities"?	<b><u>75%</u></b>	25%	73%
<b>Q9</b> with the Criteria and Indicators included under Controlled Wood Category 4 "Wood harvested in forests being converted to plantations or non-forest use"?	<b><u>69%</u></b>	31%	74%

## SUMMARY OF COMMENTS AND FSC FEEDBACK

This section is structured to provide an overview of the level of agreement on the topics that were questions in the second consultation and also a comparison from the first consultation. Each topic presents:

- a) **Questions asked in the public consultation.**
- b) **Quantitative analysis:** indicating the level of agreement and if applicable, followed by a comparison from results of previous consultation.
- c) **Qualitative analysis:** including summaries of the key topics from the qualitative feedbacks and FSC's comments to address them. It should be noted that FSC's response to the qualitative feedback reflects the consensus of working group and FSC secretariat.

### Topic 1 QMS requirements

#### a) Questions in the second public consultation

Question 1: To what extent do you agree with the requirements in Quality Management System?

Question 2: Please briefly explain your rationale.

#### b) Quantitative analysis

Questions --> Responses	Q1	
	Count	%
Strongly Agree	13	35%
Agree	13	35%
Neutral	4	11%
Disagree	5	14%
Strongly disagree	2	5%
<b>Total</b>	<b>37</b>	<b>100%</b>

The positive reception of question 1 was 81%. Since this topic was not questioned in the initial consultation, any direct comparison is not feasible.

#### c) Qualitative analysis

The response to the qualitative feedback is provided below. Please consider that "FSC's comments" reflects the consensus of working group and FSC secretariat.

Nr	Key Stakeholder Feedback	FSC's comment
1	The requirements are adequate, and we agree with them	No major changes will be made to the final version of the standard
2	The requirements set high threshold for CW-FM. Hence no incentive for CW-FM	The level of requirements reflect the aims of the controlled wood strategy (2019)
3	Some changes that can be made:	The requirements are a subset of FSC-STD-60-004 International Generic



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In 3.3. meetings to be conducted in common language, translator be provided

Indicators (IGI) hence no changes can be made to them.

In 3.4. minutes of the meeting kept and made available in local language

“3.6. Where negatives impacts of people, water and soil are indicated on consultations, the organization must take actions to eliminate those” to be added

In 4. “Normally” should be defined

In 4.2. add "except when there is a justified need or force majeure in the management of planted forests".

“5.2. establishment of management activities should be required” to be added

8 & 8.3. engagement should be at the level of monitoring

In 8.2.3. “vulnerable” to be added

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## Topic 2 Controlled Wood Category 1

### a) Questions in the second public consultation

Question 3: To what extent do you agree with the Criteria and Indicators included under Controlled Wood category 1 “Illegally harvested wood”?

Question 4: Please briefly explain your rationale.

### b) Quantitative analysis

Questions -->	Q3	
Responses	Count	%
Strongly Agree	12	37%
Agree	15	45%
Neutral	4	12%
Disagree	1	3%
Strongly disagree	1	3%
<b>Total</b>	<b>33</b>	<b>100%</b>

The question 3 received a notable 94% positive reception (highest agreement among all topics), indicating an improvement in agreement compared to the previous consultation which received 85% agreement.

### c) Qualitative analysis

The response to the qualitative feedback is provided below. Please consider that “FSC’s comments” reflects the consensus of working group and FSC secretariat.

Nr	Key Stakeholder Feedback	FSC’s comment
1	The requirements are adequate, and we agree with them	No major changes will be made to the final version of the standard
2	The word "substantial" is vague and a clear threshold is needed in the standard	The requirements are a subset of FSC-STD-60-004 International Generic Indicators (IGI) hence no changes can be made to the wordings.
3	<p>These requirements should be improved: 18.3.2. Involve stakeholders for dispute resolution.</p> <p>In 21.2.2 add Negative use of vulnerability, intimidation and threats, debt bondage, abusive working and living conditions etc.</p>	<p>The CW WG disagreed to make this addition to 18.3.2, because indicator 18.3 already covers this request.</p> <p>The CW WG disagreed to make this addition to 21.2.2 because the list is not limited to the examples and the addition would go beyond the current IGIs. Also, changing the IGI is outside the mandate of the WG</p>

### Topic 3 Controlled Wood Category 2

#### a) Questions in the second public consultation

Question 5: To what extent do you agree with the Criteria and Indicators included under Controlled Wood category 2 ‘Wood harvested in violation of traditional and civil rights.

Question 6: Please briefly explain your rationale.

#### b) Quantitative analysis

Questions -->	Q5	
Responses	Count	%
Strongly Agree	6	21%
Agree	16	55%
Neutral	4	14%
Disagree	1	3%
Strongly disagree	2	7%
<b>Total</b>	<b>29</b>	<b>100%</b>

The positive reception of question 5 was 90% which is a drastic positive change compared to previous consultation with 69% agreement. A substantial level of agreement has been garnered from LA region and economic chambers (from both north and south regions).

### c) Qualitative analysis

The response to the qualitative feedback is provided below. Please consider that “FSC’s comments” reflects the consensus of working group and FSC secretariat.

Nr	Key Stakeholder Feedback	FSC’s comment
1	The word "substantial" is vague and a clear threshold is needed in the requirements	The requirements are a subset of FSC-STD-60-004 International Generic Indicators (IGI) hence no changes can be made to the wordings.
2	Labour requirements should be improved (e.g., include migrant workers, include “when requested” in 21.4.3., include worst forms of child labour)	
3	Please consider including a gender approach, not only promotion of the female gender	Although agreeing with having a holistic gender approach, however the most vulnerable workers in the forestry section are still women. Furthermore, indicator 22.1 already covers this.
4	Requirements are adequate and no change needed.	No change will be made.
5	The requirements pose a high threshold for CW-FM and does not make it an attractive option and suggest dropping it (e.g., FPIC requirements, indicator 28.4).	WG considers that conformity with indicator 46.4 is important in the early stages of the FPIC process and builds the ground for full FM certification with FPIC agreements. Hence, CW WG disagreed dropping this fundamental indicator.

## Topic 4 Controlled Wood Category 3

### a) Questions in the second public consultation

Question 7: To what extent do you agree with the Criteria and Indicators included under Controlled Wood category 3 'Wood harvested in forests in which high conservation values are threatened by management activities?'

Question 8: Please briefly explain your rationale.

## b) Quantitative analysis

Questions -->	Q7	
Responses	Count	%
Strongly Agree	3	11%
Agree	15	53%
Neutral	3	11%
Disagree	5	18%
Strongly disagree	2	7%
<b>Total</b>	<b>29</b>	<b>100%</b>

The positive reception of question 7 was 75% which closely aligns with the results obtained in the previous consultation.

## c) Qualitative analysis

The response to the qualitative feedback is provided below. Please consider that “FSC’s comments” reflects the consensus of working group and FSC secretariat.

Nr	Key Stakeholder Feedback	FSC’s comment
1	The requirements set high threshold for CW-FM, hence no incentive for CW-FM	The WG agreed to drop indicator 50.3 (IGI 10.8.3), because it is sufficiently covered by 50.1. Proposal to delete indicator 42.3 (IGI 6.7.3) was accepted by the WG, because it considered that restoration of past activities is not relevant for CW. Proposal to drop indicator 46.4 (IGI 9.4.4) was accepted by the WG, because this is partly covered elsewhere in 30-010 and this will be implemented in full FM/CoC certification.
2	Full Principle 9 has been included hence making the threshold quite high for CW-FM. Some streamlining suggestions: Clause 47: remove HCV reporting requirements. Clause 43.3, 45.4: Hunting, fishing Clause 44: The Organization shall identify and protect representative sample areas of native ecosystems and/or restore them to more natural conditions.	The requirements are a subset of FSC-STD-60-004 International Generic Indicators (IGI) hence no changes can be made to the wordings.
3	Some changes could be made on specific requirements for improvement	

## Topic 5 Controlled Wood Category 4

### a) Questions in the second public consultation

Question 9: To what extent do you agree with the Criteria and Indicators included under Controlled Wood category 4 'Wood harvested in forests converted to plantations or non-forest use'?

Question 10: Please briefly explain your rationale.

### b) Quantitative analysis

Questions -->	Q9	
Responses	Count	%
Strongly Agree	3	10%
Agree	13	45%
Neutral	4	14%
Disagree	1	3%
Strongly disagree	8	28%
<b>Total</b>	<b>29</b>	<b>100%</b>

Question 9 was met with a positive reception of 69%. Notably, this topic obtained the lowest level of agreement during the second consultation.

### c) Qualitative analysis

The response to the qualitative feedback is provided below. Please consider that "FSC's comments" reflects the consensus of working group and FSC secretariat.

Nr	Key Stakeholder Feedback	FSC's comment
1	Agree with the proposed requirements	No major changes will be made to the final version of the standard
2	The requirements set high threshold for CW-FM, hence no incentive for CW-FM	
3	Conversion requirements are too high for CW-FM	The conversion requirements are derived from the latest version of Principles and Criteria, which have been approved by the FSC's General Assembly in consensus between all chambers.
4	5% ratio for converted areas is very low.	Indicators 54.2.1, 54.2.2 & 54.2.3 have been updated based on the latest version of FSC-STD-60-004 V2-1

Note: since no changes have been made in Controlled Wood category 5 since D1-0, this topic was not asked in the second consultation.

## CHANGES TO THE TITLE OF FSC-STD-30-010 AND THE TITLES OF THE FIVE CATEGORIES

D2-0		Final draft	Rationale
<b>Title of FSC-STD-30-010</b>	Controlled Wood Standard for Forest Management	Controlled Forest Management	<p>The scope of the five categories has broadened, as they are now based on International Generic Indicators and they cover NTFPs as well.</p> <p>The five category names do not refer to 'wood' anymore and have been changed to a more generic title.</p> <p>Additionally, the title of the entire standard has been changed accordingly.</p> <p>Lastly, the Working Group also has changed the category names from negative to positive to incentivize the uptake of the standard among forest managers and help to communicate the positive nature of Controlled Forest Management</p>
<b>Category 1</b>	Illegally harvested wood	Forest management and trade that respects and upholds legality	
<b>Category 2</b>	Wood harvested in violation of traditional and human rights	Forest management that respects and upholds customary and human rights, including The ILO Declaration on Fundamental Principles and Rights at Work	
<b>Category 3</b>	Wood harvested in forests in which high conservation values are threatened by management activities	Forest management that maintains or enhances social, cultural, environmental, and high conservation values (HCV)	
<b>Category 4</b>	Wood harvested in forests being converted to plantations or non-forest use	Forest management that prevents deforestation and degradation	
<b>Category 5</b>	Wood from forests in which genetically modified trees are planted	Forest management that is free of Genetically Modified Organisms (GMO)	



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