

SUMMARY OF STAKEHOLDER FEEDBACK FROM 2ND CONSULTATION ON FSC’S RISK ASSESSMENT FRAMEWORK

This document presents some highlights only.
The full Consultation Report will be published in July 2024.

FSC RISK ASSESSMENT FRAMEWORK

The Risk Assessment Framework is a procedure prescribing the requirements for assessing the risk of sourcing material from supply areas, including the designation of risk, as well as determining the mitigation measures. FSC is aligning with the EUDR which entered into force 29 June 2023.

Relevant links:



Visit the Process page



Watch a recording of the webinar



Download webinar slides

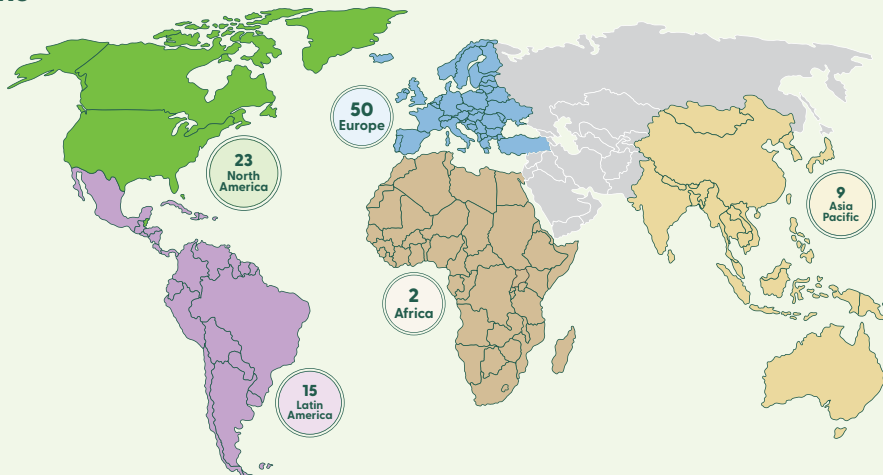


Risk Assessment Framework

CONSULTATION SUMMARY

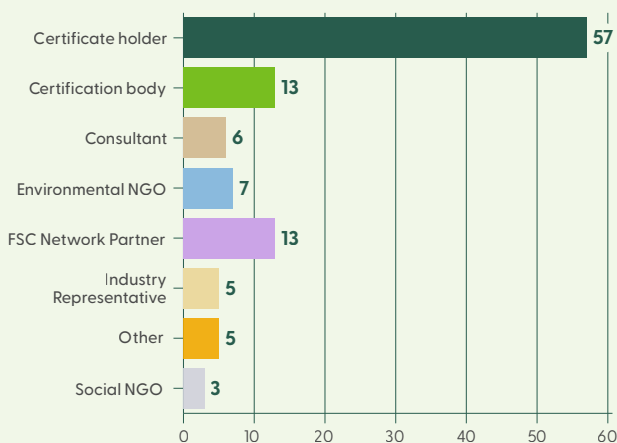
The second consultation was available for all stakeholders between 01 February and 01 March 2024. Four public webinars were held to review the draft content and answer questions from stakeholders.

Regions

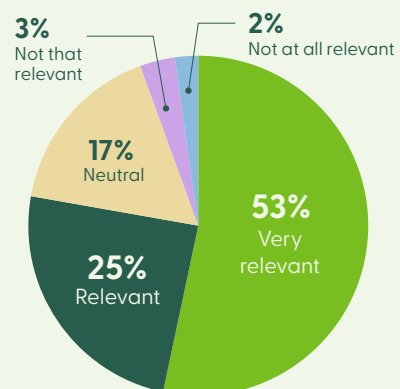


*In total there were 99 respondents to the consultation, of which 56 were FSC Members.

Stakeholder group



How relevant is the EU Deforestation Regulation (EUDR) for you or your organization?



SUMMARY OF FEEDBACK ON KEY TOPICS.

APPLICABILITY OF RISK ASSESSMENTS

Feedback: Misunderstanding regarding applicability. The risk assessments will only apply to Forest Management Certification and Chain of Custody Certification Certificate Holders aiming to conform with the FSC Regulatory Framework. The framework continues to apply for Controlled Wood Chain of Custody users.

Response: Clarified in the 'Objective' and 'Scope' sections of FSC-PRO-60-006b.

CONVERSION

Note: The second draft of FSC-PRO-60-006b V2-0 is aligned with the Policy **FSC-POL-01-007 Policy to Address Conversion** and EUDR.

Feedback: Incomplete coverage of conversion types.

Response: An additional indicator (56) has been added in the final draft to assess conversion from natural forests to land uses other than agriculture, which includes a numerical risk threshold of 0.02% gross annual loss of natural forest area.

PROCESS REQUIREMENTS

Feedback: Lack of clarity on roles and responsibilities.

Response: Added tables and visuals in the final draft of FSC-PRO-60-006b Risk Assessment Framework.

INDICATORS IN THE RISK ASSESSMENT FRAMEWORK

Feedback: Too many indicators.

Response: Reduced indicators from 76 to 64 by only covering requirements applicable to FSC not the full **Risk Information Alliance**; merged repetitive indicators.

DEGRADATION

One key component introduced in the second draft of FSC-PRO-60-006b V2-0 is to assess the risk of forest degradation since 31 December 2020.

Feedback: Unclear definition and thresholds.

Response: Only one definition is added in the Glossary of Terms, including a note providing clarification on the assessment of conversion and degradation. The term 'natural forest' was introduced in the indicator, and non-negligible risk thresholds have been revised.

ESTABLISHING MITIGATION MEASURES

Note: The revised FSC-PRO-60-006b V2-0 requires the establishment of mitigation measures where 'non-negligible' risks are identified. This is a key change from the existing FSC requirements.

Feedback: Support for consistent measures; desire for flexibility.

Response: a. In centralized type of processes, only recommended mitigation measures can be established.

b. Mandatory mitigation measures are only possible to be established by a chamber balanced Working Group.

MORE ON DEGRADATION

Where does the .02% threshold number come from?

The numerical risk threshold of 0.02% is based on the current threshold used for the assessment of indicator 4.1 on conversion as per **FSC-PRO-60-002a National Risk Assessment Framework**.

This threshold was decided based on discussion among the experts involved in the development of the Controlled Wood Risk Assessment Framework.

EUDR does not establish a numerical threshold to assess degradation at a country level.

Taking into consideration the complexity to find scientific evidence to come up with a numerical threshold to assess degradation at country level FSC is using 0.02% for the numerical threshold to assess degradation.