



# SYNOPSIS OF 2ND CONSULTATION COMMENTS

Second draft of FSC-PRO-60-006b Risk Assessment  
Framework

15/05/2024



## FOREWORD

The Risk Assessment Framework (FSC-PRO-60-006b, previously known as FSC-PRO-60-002a) is a procedure prescribing the requirements for assessing the risk of sourcing material from supply areas, including the designation and specification of risk (i.e., 'negligible risk', 'non-negligible risk'), as well as determining the mitigation measures.

Since November 2021, FSC is leading, with the support of a chamber-balanced working group, the revision of this set of requirements. With the European Union Regulation on Deforestation-free Products (EUDR) having entered into force on 29 June 2023, FSC decided to align main gaps of risk assessment related requirements with those of EUDR and incorporate them into the second draft of FSC-PRO-60-006b V2-0, in addition to the aspects that are already part of the revision scope.

Among the requirements introduced with this new regulation, operators placing relevant products on the European market or exporters shall carry out risk assessments to establish whether there is a risk that the relevant products are not in conformance with the regulation. Therefore, the <FSC-PRO-60-006b Risk Assessment Framework> is essential for organizations looking to use FSC to support their EUDR compliance.

The key changes made to this draft procedure are described in the crosswalk document shared in consultation together with the procedure, available at: [https://connect.fsc.org/sites/default/files/2024-01/FSC-PRO-60-006b%20V2-0%20D2-0\\_crosswalk.pdf](https://connect.fsc.org/sites/default/files/2024-01/FSC-PRO-60-006b%20V2-0%20D2-0_crosswalk.pdf).

This document presents the quantitative and qualitative analysis of the feedback received from stakeholders on key topics of the second draft of <FSC-PRO-60-006b Risk Assessment Framework>. The 30 days public consultation was conducted between 01 February and 01 March 2024.

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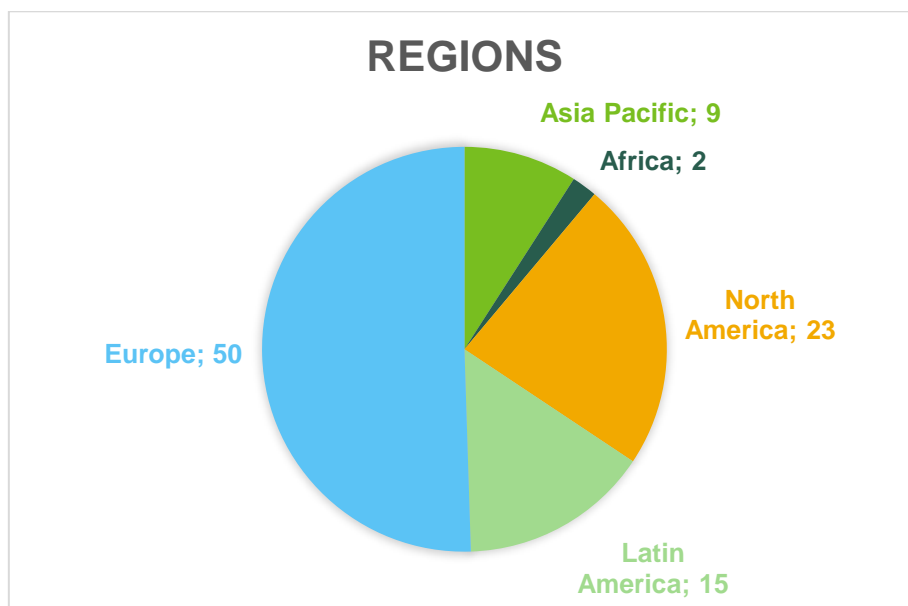
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## ABBREVIATIONS

|             |  |
|-------------|--|
| <b>EUDR</b> | European Union Regulation on Deforestation-free Products |
| <b>FSS</b>  | FSC Forest Stewardship Standard                          |
| <b>HCV</b>  | High Conservation Value                                  |
| <b>IFL</b>  | Intact Forest Landscape                                  |
| <b>RA</b>   | Risk Assessment  |
| <b>RIA</b>  | Risk Information Alliance                                |
| <b>WG</b>   | Working Group  |

## PART 1: PARTICIPATION IN THE CONSULTATION

A total of 99 participants took part in the consultation and 99 of them responded to the questions. Below mentioned are the breakdown of the respondents according to the region, membership and type.

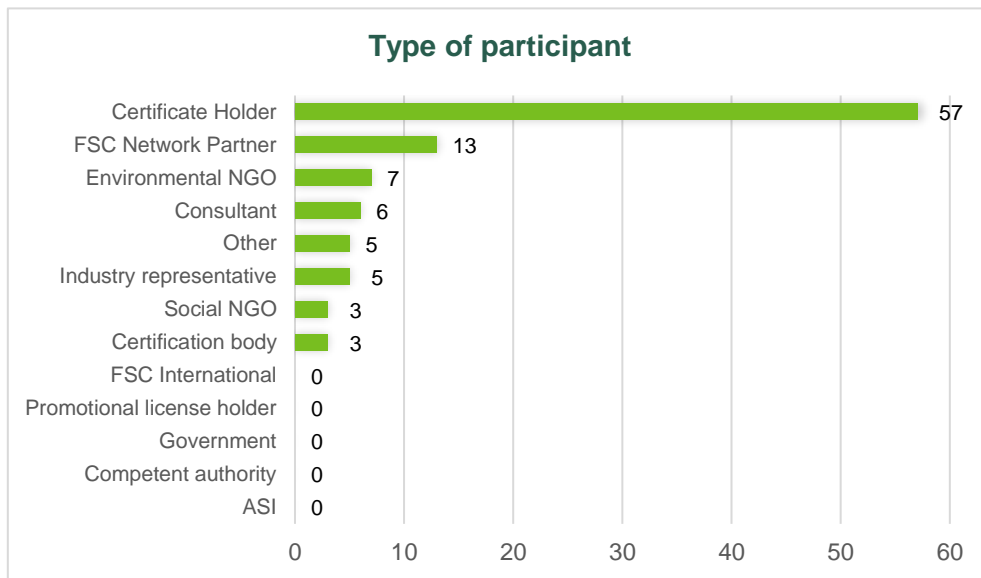


*Figure 1. Participants by region.*

Majority of the respondents were from Europe (50), followed by North America (23), Latin America (15), and Asia Pacific (9). The lowest number of respondents were recorded from Africa (2).

| Countries with the highest number of respondents |                       | Number of respondents by region |                       |
|--|-----------------------|---------------------------------|-----------------------|
| Country  | Number of respondents | Region                          | Number of respondents |
| United States                                    | 20                    | Europe                          | 50                    |
| Brazil   | 12                    | North America                   | 23                    |
| Finland  | 10                    | Latin America                   | 15                    |
| Portugal   | 7                     | Asia Pacific                    | 9                     |
| Germany  | 6                     | Africa                          | 2                     |

## Participants by groups of stakeholders

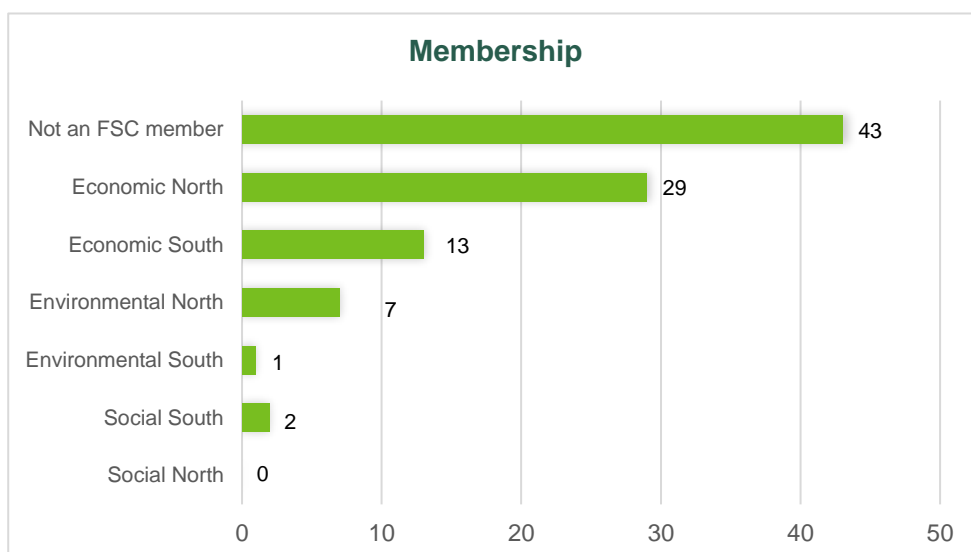


**Figure 2.** Participants by groups of stakeholders.

Respondents were identified by their role based on their responses. Participants were grouped into 13 different stakeholder groups. Among all stakeholder groups, certificate holders showed the most interest with the highest number of responses. Certificate holders represent nearly 63% of the total number of respondents. Assurance Services International (ASI), Competent Authorities (CAs), Governments, Promotional License Holders (PLHs) were among the groups with no participants.

## Participants by chamber

Among 99 participants who responded to the question, more than half of them ( $\approx 57\%$ ) were FSC members and the remaining ( $\approx 43\%$ ) were non-FSC members. The economic chamber showed the highest level of interest, with 42 out of 52 members participating in the consultation, representing  $\approx 80\%$  of the total number of members. Environmental and social chambers accounted for only  $\approx 20\%$  of the total number of members. Below is an overview of the number of participants by chamber.



**Figure 3.** Participants by chamber.

## PART 2: METHODOLOGY

The consultation topics were presented for feedback with both open-ended and closed-ended questions. The closed-ended question asked the respondents to select the level of agreement with the proposed topic (i.e., “do you agree with...”). The respondent could choose their answer from a Likert scale (i.e., “fully agree, agree, neutral, disagree, fully disagree”). Following this, then respondents were asked open-ended question to provide their rationale (i.e., “please provide more detail to your response”).

The FSC team conducted a quantitative analysis on the closed-ended questions, and a qualitative analysis on the open-ended questions.

### A. How to read quantitative results?

The percentage of responses was calculated per total of respondents and per stakeholder type to understand the agreement or disagreement of each stakeholder group with the topic of the consultation. For example, when assessing the stakeholder type, 100 in the quantitative analysis table means that all participants from the stakeholder group are in full agreement with (or support) the proposal. Whereas numbers such as 78 or 40 means the percentage of the participants from the stakeholder group that agree with (or support) the proposal. Similarly, 0 means that no participants from the stakeholder group agree with (or support) the proposal.

| Colour code | Range      |
|-------------|------------|
|             | 0-25%      |
|             | 25%-50%    |
|             | 50% - 75%  |
|             | 75% - 100% |

### B. How to read qualitative results?

In the qualitative analysis, key messages were identified across all answers. The qualitative results present the summary of all key messages and FSC accumulative feedback to those messages.

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

## PART 3: SUMMARY OF COMMENTS AND FSC FEEDBACK

This section is organized according to the key topics presented in the public consultation. Each topic presents: a) brief topic recap (as included in the consultation material), b) the quantitative analysis, and c) the qualitative analysis.

*Table 1. List of consultation topics.*

| Topic from consultation |  |
|-------------------------|--|
| <b>General</b>          | EUDR connection<br>Adoption of the Risk Assessment Framework |
| <b>Topic 1</b>          | Applicability of Risk Assessments                            |
| <b>Topic 2</b>          | Cross-scheme Risk Assessments                                |
| <b>Topic 3</b>          | Annual review of Risk Assessments                            |
| <b>Topic 4</b>          | Establishment of Mitigation Measures                         |
| <b>Topic 5</b>          | Assessment of High Conservation Values                       |
| <b>Topic 6</b>          | Assessment of Conversion                                     |
| <b>Topic 7</b>          | Assessment of Forest Degradation                             |

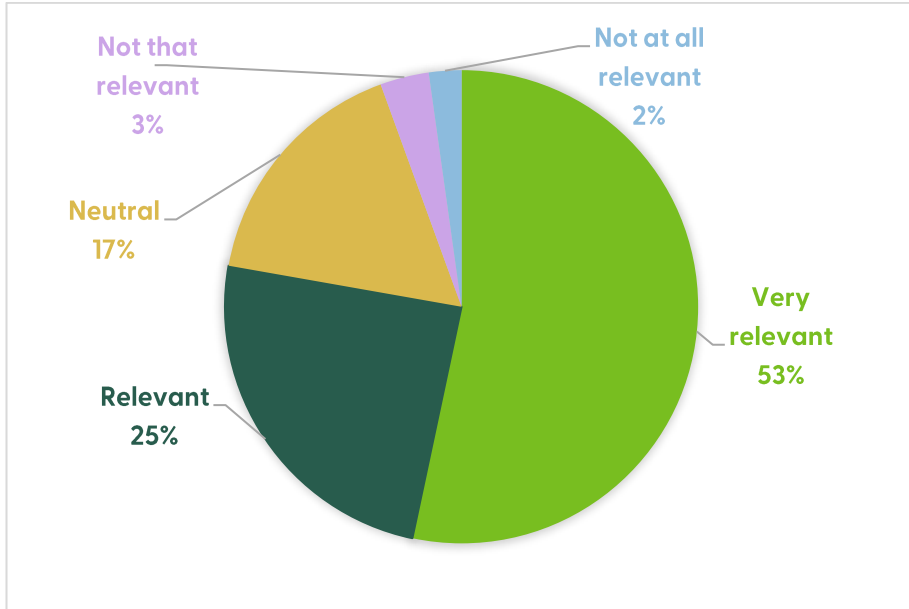


## General aspects

### Quantitative results

#### Q2. How relevant is the EU Deforestation Regulation (EUDR) for you or your organization? 5 (very relevant) to 1 (not at all relevant)

For 78% of the stakeholders that participated in the consultation the EUDR is relevant, while 17% of the participants were neutral, and only for 5% it was not relevant.

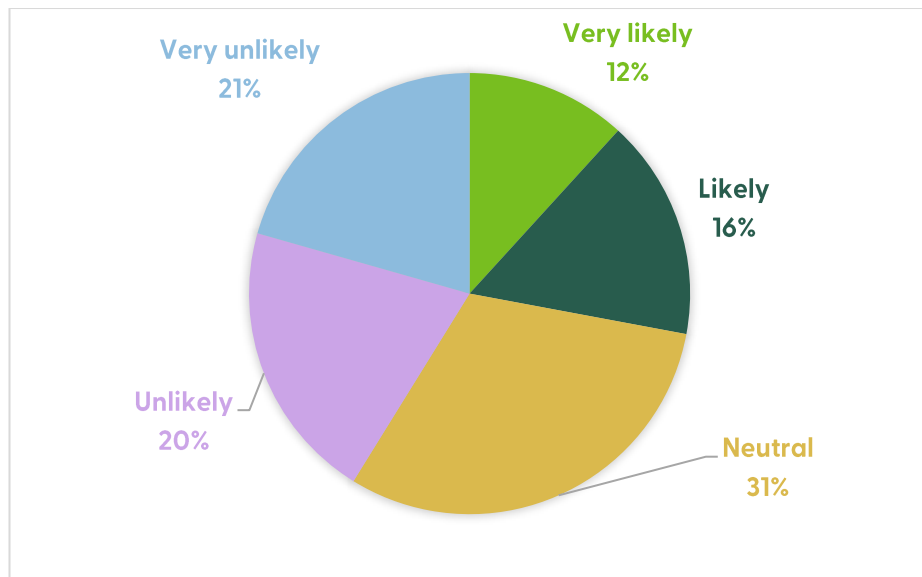


| Question | ASI | Industry representative | Certification Body | Certificate holder | Competent authority | Consultant | Environmental NGO | Social NGO | Government | Promotional license holder | FSC Network | FSC International staff member | Other |
|----------|-----|-------------------------|--------------------|--------------------|---------------------|------------|-------------------|------------|------------|----------------------------|-------------|--------------------------------|-------|
| Q2       |     | 100                     | 75                 | 79                 |                     | 67         | 96                | 63         |            |                            | 88          |                                | 75    |

[Click here](#) to understand how to read the quantitative results.

**Q33. How likely are you to adopt the revised Risk Assessment Framework? 5 (very likely) to 1 (very unlikely)**

Approximately 60% of stakeholders indicated that they might adopt the RA Framework, while 40% consider this unlikely.



| Question | ASI | Industry representative | Certification Body | Certificate holder | Competent authority | Consultant | Environmental NGO | Social NGO | Government | Promotional license holder | FSC Network | FSC International staff member | Other |
|----------|-----|-------------------------|--------------------|--------------------|---------------------|------------|-------------------|------------|------------|----------------------------|-------------|--------------------------------|-------|
| Q33      |     | 38                      | 58                 | 40                 |                     | 25         | 75                | 63         |            |                            | 66          |                                | 25    |

[Click here](#) to understand how to read the quantitative results.

## Qualitative results

### Q33. How likely are you to adopt the revised Risk Assessment Framework? 5 (very likely) to 1 (very unlikely)

| Nr. | Key Stakeholder Feedback   | FSC response  |
|-----|--|---|
| 1   | Concern on expanding the applicability of risk assessments.  | Please see the FSC response Nr. 1 provided below under the qualitative analysis of the Topic 1 Applicability of risk assessments.   |
| 2   | Another concern is the longer list of indicators, which in some cases, are going beyond FSC requirements and EUDR.   | Please see the FSC responses Nr. 1 and 2 provided below under the qualitative analysis of the Topic 2 Cross-scheme risk assessments (Q9 and Q10).   |
| 3   | The revised framework is more complex and will require additional investment of time, costs and burden during the development of risk assessments and their implementation by CHs. | <p>FSC has increased their resources for the upcoming revision of FSC risk assessments. Furthermore, FSC is working together with the partner organizations of the Risk Information Alliance (RIA) on fundraising to continue revising risk assessments and developing risk assessments for new countries.</p> <p>FSC is working together with CHs for testing the Risk Assessment templates, which contains the indicators and risk thresholds. The expected outcome of this testing is to obtain feedback on the functionality of the templates, as well as to understand the complexity and type of support the CHs will require when developing Extended Company Risk Assessments or implementing FSC Risk Assessments.</p> |

## Topic 1: Applicability of Risk Assessments

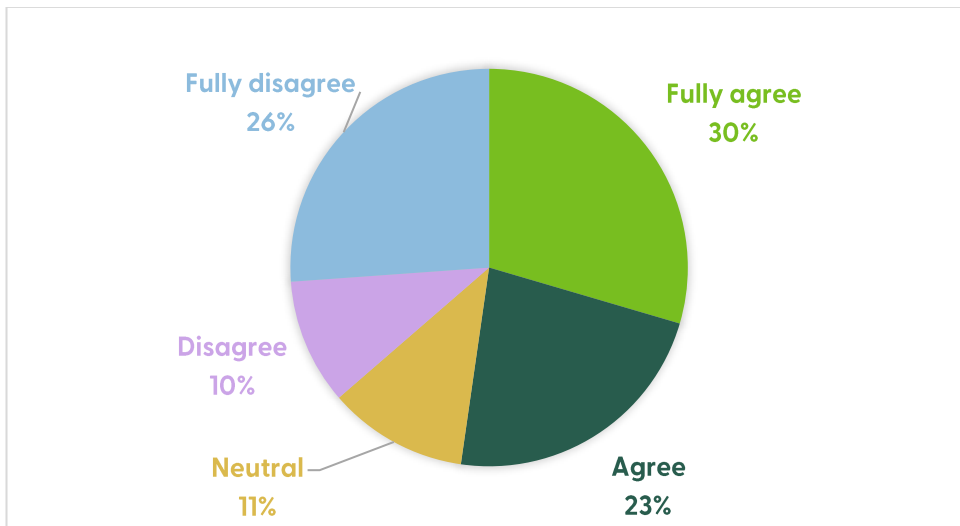
The current <FSC-PRO-60-002a FSC National Risk Assessment Framework> is only applicable to Controlled Wood (CW) and is divided by the 5 CW categories of unacceptable sources.

The EUDR requires companies to conduct a risk assessment on EUDR to ensure compliance of the products when operating in or providing products for EU markets, independent of the type of certification. Taking into consideration this context, FSC is proposing one type of risk assessment, aligned with EUDR requirements to now be applicable to Forest Management and Chain of Custody (including Controlled Wood), only for those certificate holders aiming to conform with <FSC-STD-01-004 FSC Regulatory Module>.

### Topic 1 Quantitative results

#### Q4. Do you agree with the proposal for expanding the applicability of risk assessments in alignment with EUDR?

In total, 88 out of 99 stakeholders answered this question. 64% of the participants agree or are neutral in their position regarding the expansion of the applicability. Whereas 36 % of the stakeholders do not agree.



| Question | ASI | Industry representative | Certification Body | Certificate holder | Competent authority | Consultant | Environmental NGO | Social NGO | Government | Promotional license holder | FSC Network | FSC International staff member | Other |
|----------|-----|-------------------------|--------------------|--------------------|---------------------|------------|-------------------|------------|------------|----------------------------|-------------|--------------------------------|-------|
| Q4       |     | 67                      | 50                 | 41                 |                     | 50         | 88                | 88         |            |                            | 79          |                                | 94    |

[Click here](#) to understand how to read the quantitative results.

## Topic1 Qualitative results

### Q5. Please provide more details to your response:

| Nr. | Key Stakeholder Feedback   | FSC response   |
|-----|--|--|
| 1   | <p>Support FSC's proposal to provide a voluntary solution (Regulatory Module) for those certificate holders (CHs) that want to use FSC to demonstrate compliance with EUDR, but do not support expanding the applicability of risk assessments as a systemic change making it mandatory for all CHs in the FSC system.</p> | <p>There is a misunderstanding among several stakeholders regarding the applicability of the risk assessments. The risk assessments will only apply to FM and CoC CHs aiming to conform with the FSC Regulatory Module. For non-users of the &lt;<a href="#">FSC-STD-01-004 FSC Regulatory Module</a>&gt;, risk assessments do not apply, except for CW-CoC users.</p> <p>Further clarification on the applicability of the Risk Assessment Framework have been included in the 'Objective' and 'Scope' sections of &lt;<a href="#">FSC-PRO-60-006b Risk Assessment Framework</a>&gt;.</p> <p>In addition, the communication items to be released together with the publication of the approved Risk Assessment Framework will include clarifications regarding the applicability of risk assessments.</p> |
| 2   | <p>There should be some benefits from being FSC certified and conforming with the FM requirements where many of the potential risks covered by the risk assessment indicators are mitigated.</p>   | <p>The &lt;<a href="#">FSC-STD-01-004 FSC Regulatory Module</a>&gt; establishes requirements on how FM certification covers risk assessment indicators, and how to address identified gaps for alignment with EUDR. Vast majority of the indicators in &lt;<a href="#">FSC-PRO-60-006b Risk Assessment Framework</a>&gt; are covered through FM certification and the same are reflected in the simplified risk assessment template for FM users of &lt;<a href="#">FSC-STD-01-004 FSC Regulatory Module</a>&gt;.</p>  |

## Topic 2: Cross-scheme risk assessments

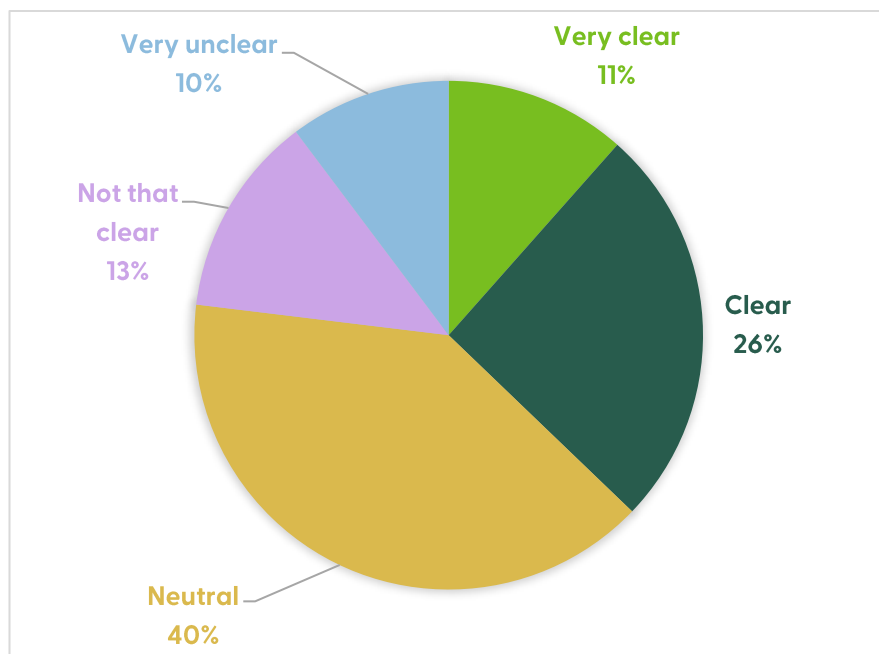
FSC is partnering with other sustainability schemes to develop cross-scheme risk assessments (through the Risk Information Alliance - RIA (further details are provided under the following link: <https://www.riskinformationalliance.org/>). This alliance aims to: a) streamline and strengthen requirements development and decision making, b) strengthen FSC's leadership in multi-stakeholder discussions through collaboration on global best practices, c) establish leadership in the field of risk assessment and mitigation beyond just FSC, and d) address time constraints and capacity challenges by having risk assessment processes not dependent solely on FSC.

In this context, there are two main proposed changes in the draft that was released in consultation:

- 1) The process requirements have been streamlined considering the need for ensuring that the requirements can be followed by other organizations participating in the Risk Information Alliance. Nevertheless, the requirements maintain the connection to FSC process structure and terminology.
- 2) The Risk Assessment Framework contains 76 indicators in comparison to the 32 indicators covered under the <FSC-PRO-60-002a FSC National Risk Assessment Framework>. Although there is an increase in the number of indicators, the topics covered are mostly the same (e.g. legality assessment, human and labour rights, HCVs, conversion, GMO, etc.). The requirements have structurally changed through how the proposed indicators are written. The indicators have been revised and reworded to include specific requirements. In <FSC-PRO-60-002a FSC National Risk Assessment Framework>, the requirements and indicators were segregated hence requiring users to go to different sections in the procedure to find applicable requirements.

### Topic 2 Quantitative results

**Q6. How would you rate the clarity of the proposed process requirements? 5 (very clear) to 1 (very unclear)**

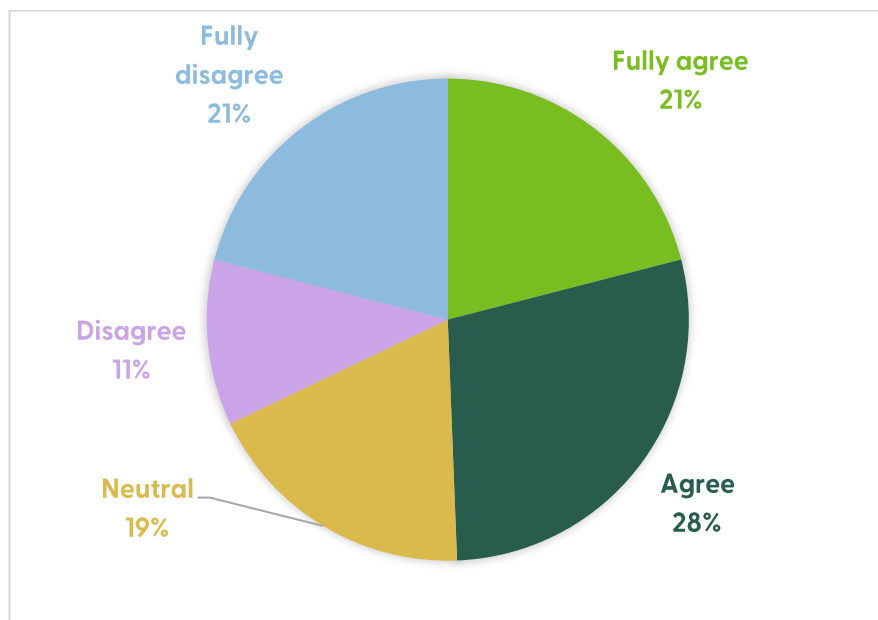


More than 70% of stakeholders consider the process requirements to be clear or are neutral in their position, while 23% consider that they are not clear.

**Q7. Which specific sections of the process requirements do you believe would benefit from additional clarification?**

| Sections                           | Total number of responses per section |
|------------------------------------|---------------------------------------|
| General aspects                    | 13                                    |
| Involved parties                   | 38                                    |
| Process registration               | 24                                    |
| Drafting                           | 25                                    |
| Consultation                       | 31                                    |
| Decision making                    | 13                                    |
| Publication and implementation     | 29                                    |
| Monitoring and review              | 26                                    |
| No additional clarification needed | 11                                    |

**Q9. Do you agree that including more and revised indicators strengthens the Risk Assessment Framework? 5 (fully agree) to 1 (fully disagree)**



68% of stakeholders agree or are neutral on the fact that the revised indicators strengthen the Risk Assessment Framework. Whereas, 42% do not agree.

| Question | ASI | Industry representative | Certification Body | Certificate holder | Competent authority | Consultant | Environmental NGO | Social NGO | Government | Promotional license holder | FSC Network | FSC International staff member | Other |
|----------|-----|-------------------------|--------------------|--------------------|---------------------|------------|-------------------|------------|------------|----------------------------|-------------|--------------------------------|-------|
| Q6       |     | 38                      | 50                 | 52                 |                     | 44         | 56                | 25         |            |                            | 65          |                                | 81    |
| Q9       |     | 75                      | 50                 | 47                 |                     | 25         | 88                | 75         |            |                            | 66          |                                | 75    |

[Click here](#) to understand how to read the quantitative results.

## Topic 2 Qualitative results

**Q6. How would you rate the clarity of the proposed process requirements? 5 (very clear) to 1 (very unclear)**

**Q7. Which specific sections of the process requirements do you believe would benefit from additional clarification?**

| Nr. | Key Stakeholder Feedback  | FSC response  |
|-----|---|---|
| 1   | There should be requirements to secure the role of the FSC Network Partner, the SDG or similar body from the specific country in the consultation and approval process.                     | Clause 5.4 has been added in the final draft to indicate that the process lead shall engage FSC Network Partners, where they exist, during the consultation of draft risk assessments. In countries where FSC Network Partners do not exist, FSC Standard Development Groups (SDGs) and/or Working Groups (WGs) should be consulted. They are also listed in 'Annex 1 Stakeholder groups to be consulted in the risk assessment process'. |
| 2   | The terms 'senior reviewer' and 'the responsible organization' are mentioned in different parts of the procedure but it is not clear who they are.  | Table 1 has been added in the final draft to clarify the role of involved parties in a risk assessment process.<br>The table provides a comparison of involved parties between centralized and major type of processes.   |
| 3   | It is not clear if the process requirements for developing and revising risk assessments can be used by any sustainability scheme, and if such risk assessments would be recognized by FSC. | The 'Introduction' section has been modified to clarify that risk assessments can be developed and revised through centralized or major type of processes. In addition, the 'Scope' section was modified to clarify which sections of the <u>&lt;FSC-PRO-60-006b Risk Assessment Framework&gt;</u> apply to major and centralized type of processes.  |



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A centralized process can be conducted by FSC or an organization participating in the Risk Information Alliance - RIA<sup>1</sup> (hereinafter referred to as 'responsible organization') by following the process requirements outlined in the <FSC-PRO-60-006b Risk Assessment Framework>.

Major processes are conducted through a chamber balanced Working Group and follow the process requirements specified in <FSC-PRO-60-006 The Development and Revision of FSC Country Requirements>.

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**4** It is not clear in which step of the risk assessment process the involved parties should be involved. For example, when is consultation with experts required.

Table 2 has been added to the final draft of the procedure to clarify in which step of the process involved parties participate, when developing or revising a risk assessment through a centralized type of process.

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<sup>1</sup> For further information on the Risk Information Alliance, please access the following link:  
<https://www.riskinformationalliance.org/>

**Q9. Do you agree that including more and revised indicators strengthens the Risk Assessment Framework? 5 (fully agree) to 1 (fully disagree)**

**Question 10. Please provide more detail to your response. In addition, in case you have identified any concern(s) or have inputs to specific indicator(s), please specify the indicator(s) you are referring to:**

| Nr. | Key Stakeholder Feedback  | FSC response  |
|-----|---|---|
| 1   | Increasing the number of indicators requires more investment of time and resources and adds complexity to the risk assessments.   | All indicators for which stakeholders provided feedback or raised their concerns have been revised by the WG supporting this revision process. Those indicators in the second draft are: 5, 6, 10, 16, 17, 19, 20, 22, 25, 27, 29, 31, 32, 34, 36, 40, 42, 44, 49, 51, 53, 60, 61, 63, 68, and 69.  |
| 2   | Some indicators are not applicable to FSC and should be dropped, mainly those focused on sustainability issues beyond those covered by legal requirements, such as: introduction of invasive species, FPIC, land tenure, waste management, etc. | As a result of discussion and agreements reached by the WG, the number of indicators was reduced from 76 in the second draft to 64 in the final draft of the procedure. The set of indicators included in the draft which was presented for second consultation was also covering requirements relevant for the RIA, now this has been altered in the final draft where indicators focus on the ones applicable to FSC. For example, indicator 22 <i>Introducing invasive species is avoided, and already present invasive species are controlled</i> is not considered applicable to FSC, therefore has been dropped from the procedure. |
| 3   | Some indicators are repetitive and should be dropped. For example, those regarding legal requirements for management and operational activities.  | Suggestions from stakeholders were also taken into consideration to improve the wording of some indicators. It is important to highlight that in the case of indicators 40, 42, 44, 49, 51, 53, and 60 which focus on labour rights and third parties' rights as specified in ILO provisions and United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), all those requirements are already covered in the current indicators under CW category 2 of <FSC-PRO-60-002a FSC National Risk Assessment Framework> and therefore were not dropped.  |
|     |   | Regarding indicators that are repetitive, the suggestions from stakeholders were taken into consideration. For example, indicators 8, 9, and 18 focused on legal requirements for management and operational activities have been merged into one indicator.  |
|     |   | Finally, non-negligible risk thresholds for all indicators have been revised, reduced in some cases to ensure consistency and clarity.  |

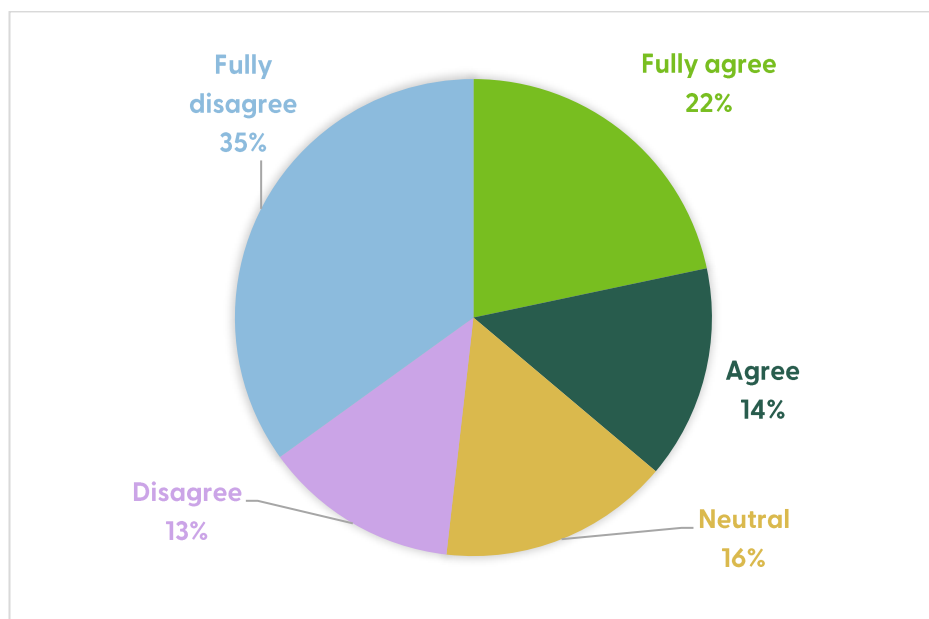
### Topic 3: Annual Review of Risk Assessments

As per current requirements in <FSC-PRO-60-002a FSC National Risk Assessment Framework> the CW risk assessments have to be updated at least every 5 years. EUDR requires operators to review their risk assessments at least on an annual basis. Taking this into consideration, the revised procedure <FSC-PRO-60-006b Risk Assessment Framework> includes a requirement for an annual review of risk assessments, in addition to a complete review and eventual revision every 5 years.

This annual review and update shall ensure that the applicable legislation, risk designations and mitigation measures are up to date.

#### Topic 3 Quantitative results

**Q11. Do you agree with the proposal for annual review of risk assessments in alignment with EUDR? 5 (fully agree) to 1 (fully disagree)**



Opinions are divided on this topic as 52% of stakeholders agree or are neutral with the proposal, while 48% do not agree.

| Question | ASI | Industry representative | Certification Body | Certificate holder | Competent authority | Consultant | Environmental NGO | Social NGO | Government | Promotional license holder | FSC Network | FSC International staff member | Other |
|----------|-----|-------------------------|--------------------|--------------------|---------------------|------------|-------------------|------------|------------|----------------------------|-------------|--------------------------------|-------|
| Q11      |     | 67                      | 58                 | 30                 |                     | 25         | 83                | 100        |            |                            | 54          |                                | 81    |

[Click here](#) to understand how to read the quantitative results.

### Topic3 Qualitative results

#### Q 11. Do you agree with the proposal for annual review of risk assessments in alignment with EUDR? 5 (fully agree) to 1 (fully disagree)

| Nr. | Key Stakeholder Feedback   | FSC response   |
|-----|--|--|
| 1   | Concerns on how practical it is to implement the added requirements as well as the resources needed for an annual review.  | The requirements for annual review have been modified to clarify the following: <ul style="list-style-type: none"><li>a. The annual review is done by the responsible organization and will only focus on reviewing the comments received from stakeholders on published risk assessments to ensure that the applicable legislation, risk designations and mitigation measures are up to date.</li></ul> |
| 2   | It is not clear whether the annual review will cover all requirements of the risk assessment, including all indicators. It will be a burden to review and revise 76 indicators annually. | <ul style="list-style-type: none"><li>b. If there are changes in the area under assessment leading to a change in applicable legislation, risk level or risk mitigation, the responsible organization shall decide if a revision should be done immediately or if the information can be stored and included during the next scheduled revision.</li></ul>   |
| 3   | Recommendation for annual reviews to only be applicable for users of the <u>&lt;FSC-STD-01-004 FSC Regulatory Module&gt;</u> .   | <ul style="list-style-type: none"><li>c. In case the need for a revision following an annual review is confirmed, the responsible organization shall follow the requirements for accelerated process type as specified in <u>&lt;FSC-PRO-60-006 The Development and Revision of FSC Country Requirements&gt;</u>.</li></ul>  |

Although the requirements for annual review of comments have been included in the Risk Assessment Framework as part of the alignment with EUDR, we consider these requirements will have a positive impact on the overall quality and relevance of risk assessments. Therefore, the requirement for an annual review has been retained in the final draft.

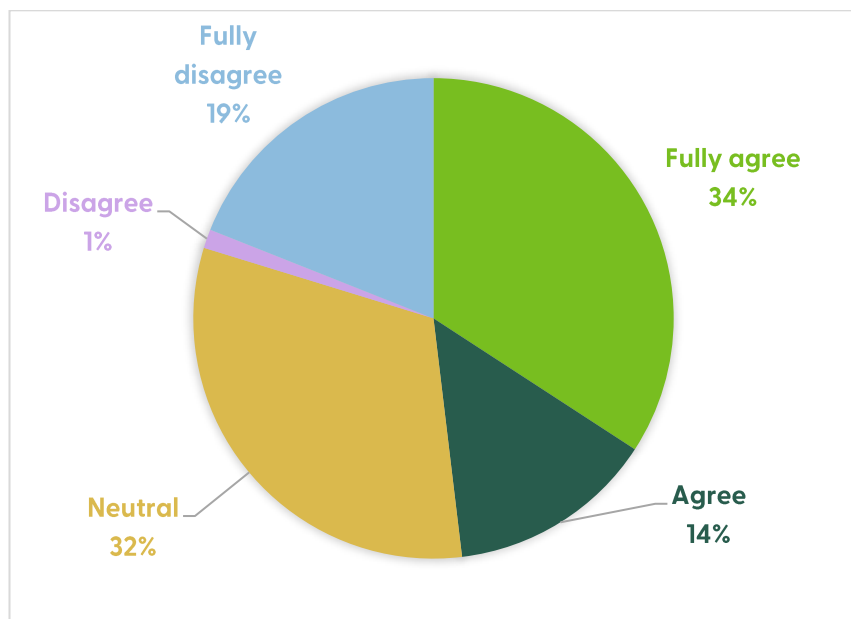
## Topic 4: Establishment of Mitigation Measures

The second consultation draft for <FSC-PRO-60-006b Risk Assessment Framework> requires the establishment of mitigation measures where 'non-negligible' risks are identified. This is a key change from the existing <FSC-PRO-60-002a FSC National Risk Assessment Framework> where it is voluntary for standard developer to establishing mitigation measures.

Requirement to specify mitigation measure in case of 'non-negligible' risk will bring consistency in the implementation of FSC requirements across different countries.

### Topic 4 Quantitative results

**Q13. Do you agree with the proposal to establish consistent mitigation measures? 5 (fully agree) to 1 (fully disagree)**



80% of the stakeholders agree or are neutral with having a consistent establishment of mitigation measures in the risk assessments, while 20% disagree to it.

| Question | ASI | Industry representative | Certification Body | Certificate holder | Competent authority | Consultant | Environmenta I NGO | Social NGO | Government | Promotional license holder | FSC Network | FSC International staff member | Other |
|----------|-----|-------------------------|--------------------|--------------------|---------------------|------------|--------------------|------------|------------|----------------------------|-------------|--------------------------------|-------|
| Q13      |     | 83                      | 67                 | 48                 |                     | 50         | 100                | 100        |            |                            | 75          |                                | 75    |

[Click here](#) to understand how to read the quantitative results.

## Topic 4 Qualitative results

**Q13. Do you agree with the proposal to establish consistent mitigation measures? 5 (fully agree) to 1 (fully disagree)**

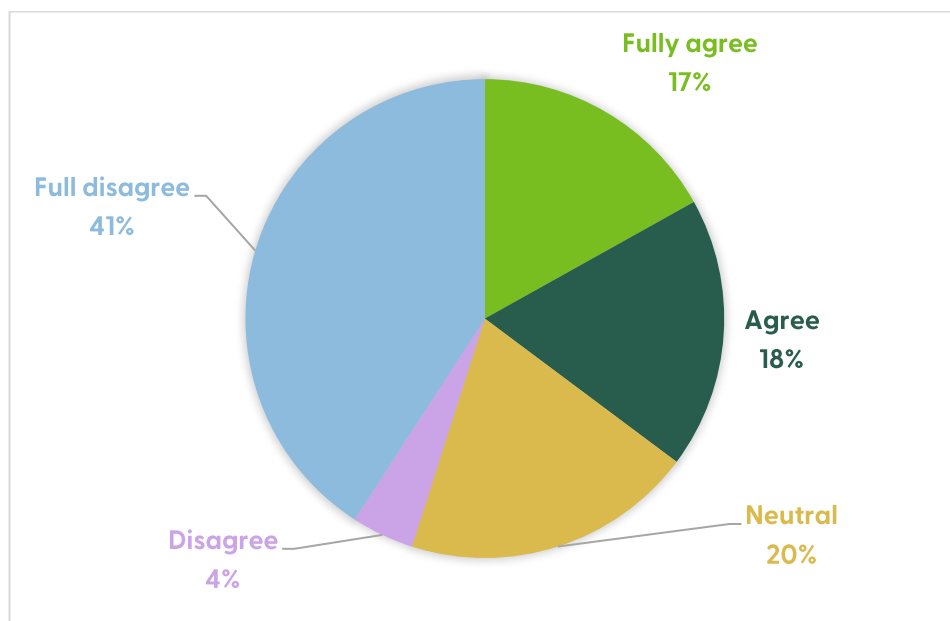
| Nr. | Key Stakeholder Feedback   | FSC response   |
|-----|--|--|
| 1   | There needs to be more flexibility for CHs to define their own mitigation measures suitable to their context . The adequacy of those mitigation measures should be determined by the certification body. | <p>The Working Group reviewed the requirements for the final draft of this procedure and agreed by consensus to modify the requirements as follows:</p> <ul style="list-style-type: none"><li>a. In centralized type of processes, only recommended mitigation measures can be established.</li><li>b. Mandatory mitigation measures are only possible to be established by a chamber balanced WG when developing or revising a risk assessment through a major type of process, as per requirements established under &lt;<u>FSC-PRO-60-006 The Development and Revision of FSC Country Requirements</u>&gt;.</li></ul> |

## Topic 5: Assessment of High Conservation Values (HCVs)

In the current <FSC-PRO-60-002a FSC National Risk Assessment Framework>, Intact Forest Landscapes (IFLs) identification is based on Global Forest Watch maps at <http://intactforest.org>. However, other sources of information could help identify natural and human disturbances that can impact IFL delineation. The second consultation draft of <FSC-PRO-60-006b Risk Assessment Framework> proposes to update IFL boundaries using other forms of best available information, such as historical harvesting documentation, existing Forest Stewardship Standard (FSS) frameworks, maps and external data provided by independent organizations, scientists and experts.

### Topic 5 Quantitative results

**Q21. Do you agree with the proposal for expanding the requirements for identification of IFLs? 5 (fully agree) to 1 (fully disagree)**



There are divided opinions on this topic as 45% of stakeholders do not agree with the proposal, while 55% agrees or are neutral in their position regarding the expansion of requirements for identification of IFLs.

| Question | ASI | Industry representative | Certification Body | Certificate holder | Competent authority | Consultant | Environmental NGO | Social NGO | Government | Promotional license holder | FSC Network | FSC International staff member | Other |
|----------|-----|-------------------------|--------------------|--------------------|---------------------|------------|-------------------|------------|------------|----------------------------|-------------|--------------------------------|-------|
| Q21      |     | 67                      | 38                 | 32                 |                     | 31         | 85                | 88         |            |                            | 68          |                                | 13    |

[Click here](#) to understand how to read the quantitative results.

## Topic 5 Qualitative results

**Q21. Do you agree with the proposal for expanding the requirements for identification of IFLs? 5 (fully agree) to 1 (fully disagree)**

| Nr. | Key Stakeholder Feedback   | FSC response   |
|-----|--|--|
| 1   | The limitations of the Global Forest Watch dataset have been repeatedly explored. The intentional inclusion of other more applicable data/information sources or sources more specific to the geographic scope of the risk assessment is a very positive change.                 | The requirement for identification of IFLs has been modified in Clause 15.10 of the final draft as follows: All Intact Forest Landscapes (IFL) as defined by the maps at <a href="http://intactforests.org">http://intactforests.org</a> shall be used as IFL unless other sources indicate that this data is not up to date or complete. In those cases, the process lead shall use other forms of best available |
| 2   | The identification of IFLs in one country should not contradict between risk assessments and Forest Stewardship Standards (FSS).   | information such as IFLs identified in existing HCV frameworks according to Clause 15.8, historical harvesting documentation, maps and external data provided by independent organizations, scientists, and experts.   |
| 3   | Recognizing the importance of tools beyond GFW data is essential. There are numerous examples where local information and data is useful to refine IFL boundaries.   | To accommodate the feedback from the consultation, the requirement states that the use of other available information shall be used when it is confirmed that Global Forest Watch maps are not up to date or are incomplete, not in all cases.   |
| 4   | The higher number of sources available the better, however, if the data from the additional sources consistently show the same results, this requirement should be removed as it would only add extra work.  |  |
| 5   | It should be a voluntary requirement.  |  |
| 6   | This is a misunderstanding because the requirement established under section '5.3 Gathering of information' in <u>&lt;FSC-PRO-60-002a FSC National Risk Assessment Framework&gt;</u> applies to the assessment of all HCVs, and does not focus only on Global Forest Watch maps. | The only requirement established under <u>&lt;FSC-PRO-60-002a FSC National Risk Assessment Framework&gt;</u> for the identification of IFLs is found under 'Context and considerations' for indicator 3.2 HCV2, which refers only to the Global Forest Watch maps.   |



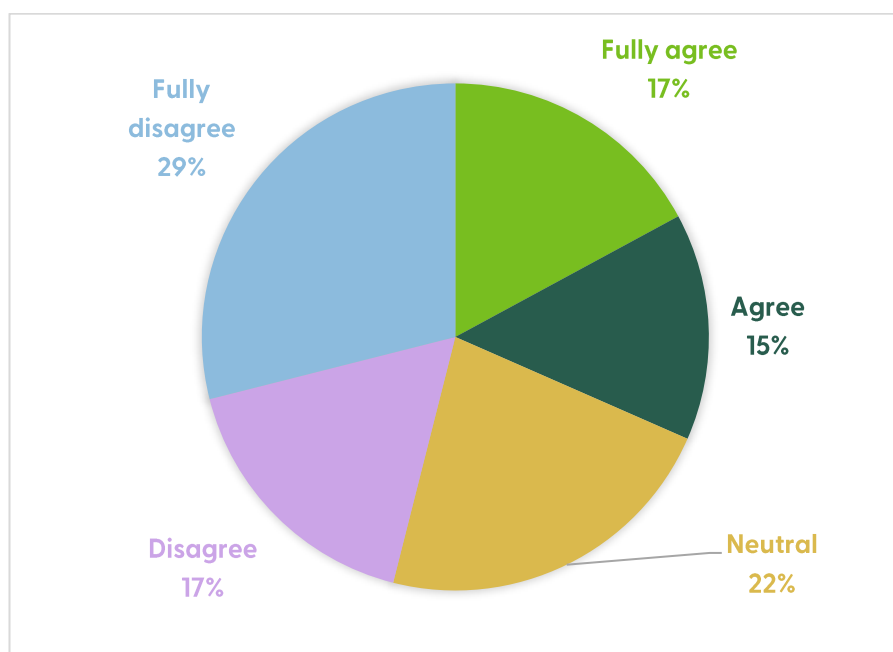
## Topic 6: Assessment of Conversion

The second consultation draft of <FSC-PRO-60-006b Risk Assessment Framework> is aligned with the Policy <FSC-POL-01-007 Policy to Address Conversion> and EUDR. The indicator 68 (*There is no conversion from forest to agriculture since 31 December 2020*) in <FSC-PRO-60-006b Risk Assessment Framework> adopts a precautionary approach to assess the risk of conversion. Therefore, a 'non-negligible' risk designation shall be applicable as a default. The risk assessments developed by a chamber-balanced working group may change the risk designation through data analysis demonstrating that conversion has not taken place in the area under assessment since 31 December 2020.

### Topic 6 Quantitative results

#### Q23. Do you agree that the FSC Risk Assessment Framework is aligned with the Policy to Address Conversion? 5 (fully agree) to 1 (fully disagree)

There are divided opinions on this topic as 54% of stakeholders agree or are neutral in their position, while 46% of the stakeholders do not agree.



| Question | ASI | Industry representative | Certification Body | Certificate holder | Competent authority | Consultant | Environmental NGO | Social NGO | Government | Promotional license holder | FSC Network | FSC International staff member | Other |
|----------|-----|-------------------------|--------------------|--------------------|---------------------|------------|-------------------|------------|------------|----------------------------|-------------|--------------------------------|-------|
| Q23      |     | 58                      | 38                 | 35                 |                     | 20         | 38                | 88         |            |                            | 65          |                                | 75    |

[Click here](#) to understand how to read the quantitative results.

## Topic 6 Qualitative results

### Q23. Do you agree that the FSC Risk Assessment Framework is aligned with the Policy to Address Conversion? 5 (fully agree) to 1 (fully disagree)

| Nr. | Key Stakeholder Feedback  | FSC response   |
|-----|---|--|
| 1   | Conversion other than that to agriculture are not covered by the proposed indicator 68 <i>There is no conversion from forest to agriculture since 31 December 2020.</i>   | The WG supporting the revision of this procedure has reviewed the second consultation results and have agreed with consensus on the following: <ul style="list-style-type: none"><li>a. 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.</li><li>b. Indicator on conversion from natural forest to agriculture (55) is maintained, including default 'non-negligible' risk designation, to ensure alignment with EUDR. Nonetheless, the indicator and risk threshold have been modified to also include the assessment of transformation of plantations to agricultural use.</li></ul> |
| 2   | The <FSC-POL-01-007 Policy to Address Conversion> allows minimal conversion as per policy element 6, while RA indicator does not, and even for major type of processes, it will not be possible to demonstrate/measure 'zero conversion'. |  |
| 3   | The definition of conversion should be aligned with EUDR.   |  |
| 4   | Definitions for the same topic should be the same within all FSC normative documents.   | The definition included in the procedure is based on the <FSC-POL-01-007 Policy to Address Conversion>. A new note has been added in the final draft which clarifies that FSC Risk assessments will ensure alignment with EUDR through the indicators on conversion and HCVs.  |

## Topic 7: Assessment of Forest Degradation

One key component introduced in the second consultation draft of <FSC-PRO-60-006b Risk Assessment Framework> is to assess the risk of forest degradation since 31 December 2020. EUDR defines forest degradation as 'structural changes to forest cover, taking the form of the conversion of:

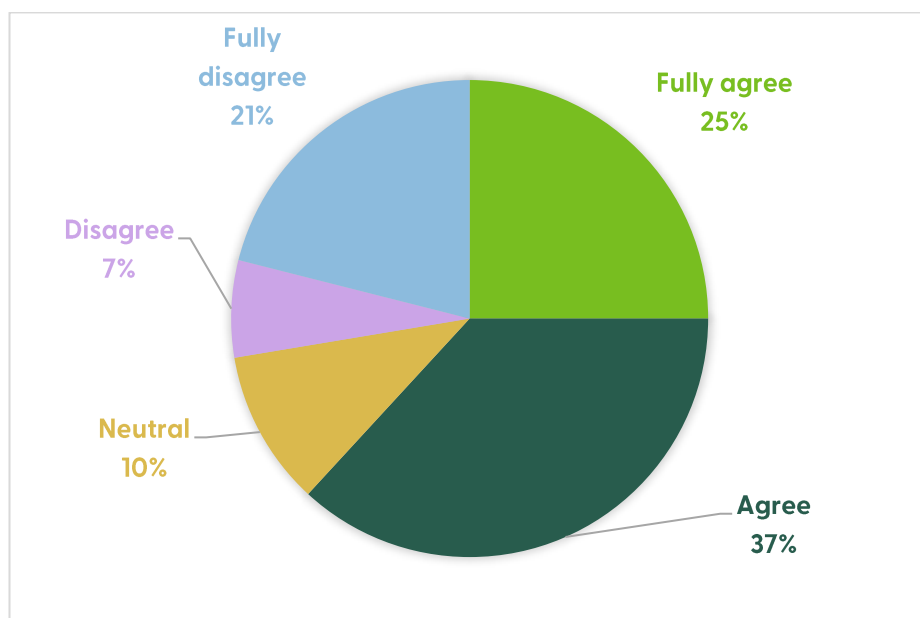
- (a) primary forests or naturally regenerating forests into plantation forests or into other wooded land; or
- (b) primary forests into planted forests.'

In this context, the indicator 69 (*There is no forest degradation since 31 December 2020*) in the second consultation draft of <FSC-PRO-60-006b Risk Assessment Framework> includes a numerical 'non-negligible' risk threshold to assess the indicator: The degradation of forests since 31 December 2020 is more than 0.02% on average per year.

### Topic 7 Quantitative results

#### Q25. Do you agree with the proposal for assessing forest degradation in alignment with EUDR requirements? 5 (fully agree) to 1 (fully disagree)

73% of the stakeholders agree or are neutral in their position regarding the topic. Around 30% do not agree with it .



| Question | ASI | Industry representative | Certification Body | Certificate holder | Competent authority | Consultant | Environmental NGO | Social NGO | Government | Promotional license holder | FSC Network | FSC International staff member | Other |
|----------|-----|-------------------------|--------------------|--------------------|---------------------|------------|-------------------|------------|------------|----------------------------|-------------|--------------------------------|-------|
| Q25      |     | 83                      | 75                 | 57                 |                     | 35         | 19                | 88         |            |                            | 75          |                                | 75    |

[Click here](#) to understand how to read the quantitative results.

## Topic 7 Qualitative results

**Q25. Do you agree with the proposal for assessing forest degradation in alignment with EUDR requirements? 5 (fully agree) to 1 (fully disagree)**

| Nr. | Key Stakeholder Feedback   | FSC response  |
|-----|--|---|
| 1   | There is concern on how developers of risk assessments will assess degradation using the numerical 'non-negligible' risk threshold (0.02% average per year).   | The WG reviewed the second consultation draft based on the feedback received from stakeholders and agreed with consensus on the following changes in the final draft:   |
| 2   | The section on degradation reads as if there would be 2 different definitions of degradation depending on the scope of application: EUDR definition and definition based on < <a href="#">FSC-POL-01-007 Policy to Address Conversion</a> >. | <ol style="list-style-type: none"><li>The term 'natural forest' was introduced in the indicator to assess degradation.</li><li>Non-negligible risk thresholds have been revised to ensure consistency and understanding by users.</li></ol>   |
| 3   | Do not agree with a numerical threshold. Degradation should be determined using an assessment of applicable legislation and strength of enforcement in the country of origin.  |   |
| 4   | The assessment of degradation should only be applicable to users of the < <a href="#">FSC-STD-01-004 FSC Regulatory Module</a> >.  |   |
| 5   | Based on which sources was the numerical risk threshold of 0.02% to assess degradation determined.   | <p>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 &lt;<a href="#">FSC-PRO-60-002a FSC National Risk Assessment Framework</a>&gt;. This threshold was decided based on discussion among the experts involved in the development of the CW RA framework.</p> <p>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, the WG supporting the revision of this procedure, based on discussions with FSC, agreed to use 0.02% for the numerical threshold to assess degradation.</p> |



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