

REVISION OF FSC PRINCIPLES AND CRITERIA, INTERNATIONAL GENERIC INDICATORS, AND OTHER FOREST MANAGEMENT NORMATIVE DOCUMENTS

Background and questions for the conceptual phase public consultation



Title:	Revision of FSC Principles and Criteria, International Generic Indicators, and other Forest Management normative documents
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Responsible program:	Forest Management Program
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INTRODUCTION

The Forest Stewardship Council (FSC) is revising FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship (P&C), FSC-STD-60-004 V2-1 International Generic Indicators (IGI) and related forest management normative documents (referred as 'PCI revision') indicated in Table 1 below. The objective of a simultaneous revision of multiple normative documents is to accommodate a consistent and stepwise transitioning of requirements for certificate holders and standard developers.

The FSC Global Strategy (2021–2026) outlines FSC's overarching 2050 vision: "Resilient forests sustaining life on Earth", while the PCI serve as the operational framework to achieve it. The PCI provide the core elements for guiding responsible forest management, ensuring environmental, social, and economic benefits.

The requirements to be followed by FSC for the revision of these documents are regulated by FSC-PRO-01-001 The Development and Revision of FSC Requirements. This revision is designated as a major process.

At its 87th Board meeting in March 2021, the FSC Board of Directors decided to jointly review and, if necessary, revise the PCI documents in 2024.

The process in 2025 is currently in its conceptual phase. As part of this phase, the FSC Secretariat is conducting a public consultation to gather input and guidance from stakeholders. This consultation will define the direction, scope, and priorities that the revised PCI should follow during the drafting phase.

Code	Version	Title
FSC-STD-01-001	V5-3	<u><FSC Principles and Criteria for forest stewardship></u>
FSC-STD-60-004	V2-1	<u><International Generic Indicators></u>
FSC-POL-10-004	V1-0	<u><Scope of Application of the FSC Principles and Criteria for Forest Stewardship></u>
FSC-POL-20-003	V1-0	<u><FSC Policy on Excision of Areas from the Scope of Certification></u>
FSC-DIR-20-007	n/a	<u><FSC Directive on Forest Management Evaluations></u>

Table 1: Normative documents included in the PCI revision process

The PCI revision runs in parallel and closely aligns with the ongoing revision of Requirements for the Development and Maintenance of FSC Country Requirements (Forest Stewardship Standards and FSC Risk Assessments). FSC-PRO-60-006 The Development and Revision of FSC Country Requirements sets the process for developing and maintaining Country Requirements (covering both country Forest Stewardship Standards (FSS) and FSC Risk Assessments), while FSC-PRO-60-006a/-006b specify the content frameworks that standard developers will use when translating international requirements into country relevant indicators and risk determinations. This architecture ensures that the PCI that emerge from the international revision are "fit for purpose" for standard developers to adopt, adapt, drop and add to in country contexts (AADA), without losing system coherence.

Since the PCI and Country Requirements revisions are moving in parallel, the alignment happens as follows:

1. The revision pivots the PCI to an outcome-oriented design grounded in a Theory of Change: each Criterion will express a single intended outcome, and together the Criteria outcomes contribute to a single overarching intended outcome at Principal level, while the IGI specify the

activities that verifiably contribute to those results, keeping assurance practical and auditable. The standard developers could choose between 3-5 key intended outcome for their FSS and monitor and report the progress against them.

2. Structurally, FSC is streamlining and proposing to move towards a modular “Core + pre-configured context requirements (defined by vegetation type, products, services, and user type, proportionate to Scale, Intensity and Risk - SIR). This modular system (aligned with the SIR concept) should make the standards more user-oriented by reflecting the diverse realities of tropical natural forests, plantations, community forests, smallholders, among others, within one framework. It also explicitly integrates concepts like SIR that are already expected in country standards development, making the international standard more adaptable.
3. To reduce duplication and sharpen roles, the instructions for standard developers and several IGI annexes are proposed to be pared back or relocated to the PRO-60-006/-006a framework, improving coherence across the system.
4. Finally, the requirements in the FSC-POL-20-003 FSC Policy on Excision of Areas from the Scope of Certification (Policy on Excision) are intended to be updated by distributing its provisions across the PCI (requirements relevant for CHs), FSC-STD-20-007 V4-1 Specific Requirements for Certification Bodies - Forest Management (requirements applicable to certification bodies), and FSC-PRO-60-006a (requirements relevant for standard developers), allowing the possible withdrawal of the stand-alone policy once integration is complete.

These conceptual phase proposals are further explained in the sections below, each of which includes specific background, details and consultation questions for your feedback. FSC greatly values the expertise and perspectives of its stakeholders. By participating in this consultation, you are helping FSC Forest Stewardship Standards to remain effective and credible for the next decades of forest management challenges and opportunities.

ABBREVIATIONS

ASI	Assurance Services International
CB	Certification Body
CH	Certificate Holder
CoC	Chain of Custody
FAO	Food and Agriculture Organization of the United Nations
FM	Forest Management
FPIC	Free, Prior, and Informed Consent
FSC	Forest Stewardship Council
FSS	Forest Stewardship Standard
GMO	Genetically Modified Organism
HCV	High Conservation Value
HRDD	Human Rights Due Diligence
IFL	Intact Forest Landscape
IGI	International Generic Indicators
ILO	International Labour Organization
IPVI	Indigenous Peoples in Voluntary Isolation
ISEAL	International Social and Environmental Accreditation and Labelling Alliance
ISO	International Organization for Standardization
MU	Management Unit
NTFP	Non-timber Forest Product
P&C	Principles and Criteria (FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship)
PCI	Principles, Criteria and Indicators (<u>FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship</u> and <u>FSC-STD-60-004 International Generic Indicators</u>)
SIR	Scale, Intensity and Risk
SLIMF	Slow and Low Intensity Managed Forests
ToC	Theory of Change

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A. Welcome to this consultation

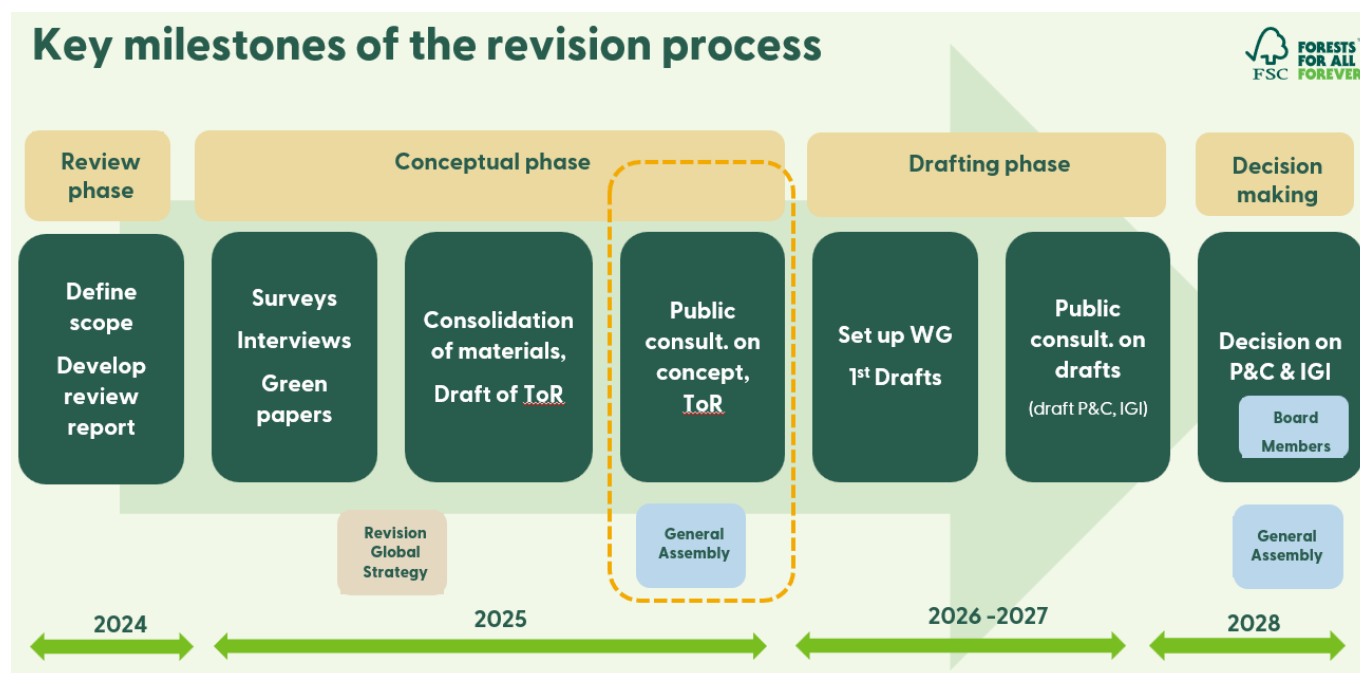
The objective of this revision is to ensure that forest management practices remain sustainable, equitable, and adaptable to both current and evolving environmental, social, and economic challenges.

The documents under revision include:

1. FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship
2. FSC-STD-60-004 V2-1 International Generic Indicators (IGI)
3. FSC-POL-10-004 V1-0 Scope of Application of the FSC Principles and Criteria for Forest Stewardship
4. FSC-POL-20-003 V1-0 FSC Policy on Excision of Areas from the Scope of Certification
5. FSC-DIR-20-007 FSC Directive on Forest Management Evaluations

During the conceptual phase, the Secretariat collaborated with FSC Membership and key stakeholders (such as FSC Members, certificate holders, certification bodies, standard developers, Indigenous Peoples, Local Communities, Network Partners and Forest Management Community) in this process, to gather feedback on specific topics.

To support this effort, the Secretariat is launching the first public consultation of the conceptual phase of the revision process (see below):



This consultation is the key opportunity to gather feedback on the proposed direction of changes and seek clarification on open issues and initially proposed solutions to guide the drafting of revised requirements.

All feedback will be consolidated and analyzed by the Secretariat. By April 2026, the consultation report will be published together with the final approved version of the Terms of Reference (ToR) for the working group revising the PCI. The results of the consultation will guide the formulation of the requirements in the documents under scope in this revision.

Consultation details

This public consultation consists of 42 questions, focusing on directing the conceptual phase of the PCI revision.

- Public consultation period: From 01 October 2025 until 30 November 2025.
- Your feedback is essential, and the time invested in sharing your views is greatly appreciated.
- The insights you provide will directly shape the PCI revision process.

Webinar

To facilitate participation in the public consultation, webinars will be held in English with simultaneous translation into Spanish and French. These webinars will provide an overview of the consultation process and address questions and comments from participants.

- Overview of Forest Management Consultations: Tuesday, 14 October 2025.
Morning: from 09:00 to 10:30 CEST, in English only. [Register here](#).
Afternoon: from 16:00 to 17:30 CEST, with simultaneous translation to French and Spanish. [Register here](#).
This webinar will introduce the conceptual phase consultation of the PCI revision and the drafting phase consultation of the FSC-PRO-60-006 Developing and Revising FSC Country Requirements
- PCI Consultation webinar: Thursday, 20 November
Morning: from 09:00 to 10:30 CEST, in English only. [Register here](#).
Afternoon: from 16:00 to 17:30 CEST, with simultaneous translation to French and Spanish. [Register here](#).
This webinar will introduce the PCI consultation, focusing on the conceptual phase and highlight the key areas under consultation.

Instructions and Participation

- While all questions are optional, it is greatly appreciated if you answer as many as possible.
- You can save your progress and edit your responses any time before submission or until the close of the consultation period.
- The estimated time to complete the survey is approximately 90 minutes.
- For any comments or questions, please contact the Forest Management Team at forestmanagement@fsc.org

Additional information, background documents and updates can be found on PCI Hub: pci.fsc.org. Thank you for your participation in this important process to strengthen FSC's role in defining sustainable forest management.

B. Initial Questions

Stakeholder Background

Please help us understand more about your background and interests by filling in the questions below:

1. Please select your region:

- Africa
- Asia Pacific
- Europe
- Latin America
- North America

2. Please select the option(s) that best identifies yourself:

- Academia/ research organization
- Assurance Services International (ASI)
- Certificate Holder
- Certification body
- Consultant
- FSC Network Partner
- FSC International Staff
- FSC Member
- Forest owner
- Governmental organization
- Indigenous Peoples Representative
- Industry representative
- ISEAL member
- Non-Governmental Organization (NGO)
- Promotional license holder

Other (please specify)

3. Please specify your organization or company name.

4. If you are an FSC Certificate Holder, please select the type(s) of your certificate:

- FM
- FM/CoC
- CFM (CW/FM)
- CoC
- CW/CoC
- Project certification

5. If you are an FSC international member, please specify your chamber:

- Economic South
- Economic North
- Environmental South
- Environmental North
- Social South
- Social North

6. Please indicate your gender (optional):

- Female
- Male
- Non-binary
- Prefer not to say

7. To better understand our audience, please select your age group:

- Under 24
- 25-34
- 35-44
- 45-54
- 55-64
- 65 and over
- Prefer not to say

8. Please add your email address if you give your consent to be contacted by the process lead and stay informed on the process.

Bear in mind information and comments received will be addressed in compliance with data protection requirements.

1. Outcome Orientation

The following questions propose options to make the PCI more outcome oriented and seek your input on this approach.

In FSC, outcome orientation is to be deployed through two main revision processes:

- FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship (P&C), FSC-STD-60-004 V2-1 International Generic Indicators (IGI)
- FSC-PRO-60-006 The Development and Revision of FSC Country Requirements, currently under public consultation.

In the context of outcome orientation, the PCI, which define the global framework for forest stewardship, provide the opportunity to define the intended outcomes of forest stewardship on a global scale. On the other hand, FSC-PRO-60-006 complements the PCI global framework by enabling the prioritization of a few key intended outcomes for each Forest Stewardship Standard (FSS) to focus the implementation and monitoring in each country. In short, these processes would together allow the definition of a global set of intended outcomes of forest stewardship and give birth to so-called outcome-oriented FSS that would maintain practice-based requirements while allowing a stronger focus and monitoring of the progress towards the most critical outcomes in each country. Stakeholders interested in this topic are therefore encouraged to participate in both public consultations.

The diagram below in figure 1 illustrates how these elements connect.

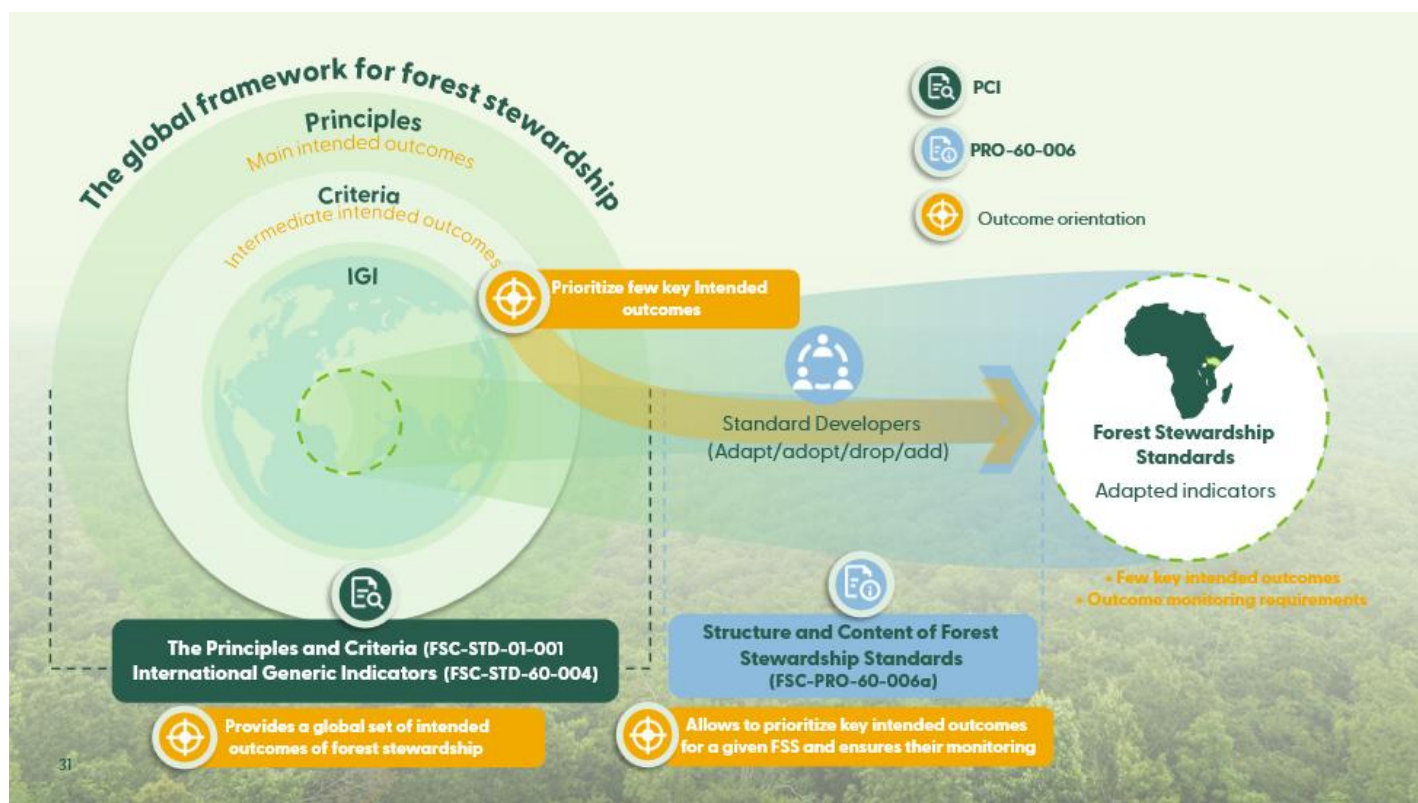


Figure 1 – Diagram explaining how the PCI and the PRO-60-006 revision processes connect to deploy outcome orientation in FSC.

As part of the PCI revision process, the Secretariat uses a theory of change (ToC) approach to define the intended outcomes of forest stewardship and their links with FSC's Vision. This ToC approach is a causal pathway or map linking the change an organization intends to make, and how to reach that change, to

identify the main intended outcomes of forest stewardship. It is suggested to use FSC's Vision ("Resilient forests sustain life on earth" as described in the FSC Global Strategy (2021–2026), because it is FSC's ultimate sustainability goal and serves as the starting point to visualize what forest stewardship should look like. This process helped the Secretariat clarify what positive impacts FSC aims to achieve on the ground - the main intended outcomes of forest stewardship and also connect this causal pathway with the overall ToC being developed as part of the FSC Global Strategy 2027-2031.

This causal pathway of the intended outcomes of forest stewardship together with the proposed design of outcome-oriented FSS resulting from FSC-PRO-60-006 helped identify how to make the PCI outcome oriented. This includes three main elements:

1. The definition of the intended outcome of forest stewardship,
2. Using intended outcomes to formulate and design the P&C,
3. Designing the IGI towards intended outcomes.

1.1 Intended outcomes of forest stewardship

This ToC starts from the FSC's Vision (the desired change), and goes backwards to identify the intended impacts, which are the lasting changes that must be in place to achieve the FSC's Vision and the subsequent pre-conditions necessary to reach the intended impacts, which are the main intended outcomes and intermediate intended outcomes (see Figure 2 below). Main intended outcomes are the outcomes used to define the principles, while intermediate intended outcomes are the outcomes used to define the criteria. Using a ToC pathway to structure the PCI around intended outcomes would bring an outcome-oriented structure to the P&C. In this logic structure the criteria (i.e. intermediate intended outcomes) would act as pre-conditions to achieve the intended outcomes of the principles (i.e. main intended outcomes).

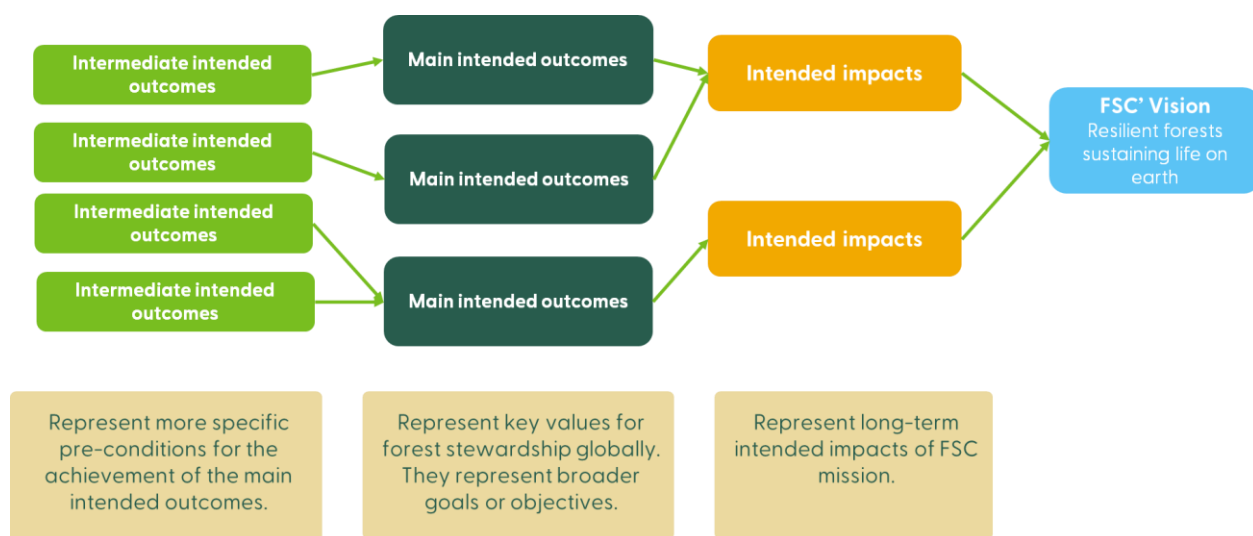


Figure 2. Description of the proposed theory of change structure to define the main intended outcomes and impacts of forest stewardship

The proposed main intended outcomes of forest stewardship are listed as follows:

1. Forestry operations are legally compliant.
2. The social and economic wellbeing of workers are safeguarded.
3. Indigenous Peoples's rights are upheld, their knowledge systems, identity, culture and wellbeing in relation to their forests is thriving.
4. The Social and economic wellbeing of local communities is safeguarded
5. Forestry operations are sustainable and economically viable.
6. Native ecosystem structure and composition resemble that of a reference native ecosystem.

7. Native ecosystem functional processes resemble that of a reference native ecosystem.
8. Management plans are effectively implemented, regularly updated based on monitoring results, and support adaptive forest management
9. Objective evidence about progress towards sustainability outcomes is compiled

Question:

9. *To what extent do you agree with the list of main intended outcomes of forest stewardship proposed above? (1 – Strongly disagree, 5 – Strongly agree)*

1.2 Making the PCI outcome-oriented: using intended outcomes to formulate and design the P&C

Two major aspects of the P&C can be improved by formulating and designing the P&C around intended outcomes.

First, the formulation of Principles and Criteria in P&C are complex and not focused on the intended outcomes they should contribute to. The language of the P&C can be simplified by using intended outcomes to formulate them. This can be done by making the sentences short and showing the desired result or intended outcome. The advantage of this change is that the P&C would have a clear and simple language, which in turn would be more accessible to different users.

Example

An example of Principle 2, and Criterion 2.2 is presented below:

Current wording:

- Principle 2. The Organization shall maintain or enhance the social and economic wellbeing of workers.
- Criterion 2.2. The Organization shall promote gender equality in employment practices, training opportunities, awarding of contracts, processes of engagement and management activities.

Proposed wording (using intended outcomes):

- Principle 2. The social and economic wellbeing of workers is safeguarded.
- Criterion 2.2. Workers, irrespective of their gender, have equitable working conditions and benefits.

In the current P&C, Principles and Criteria are not consistently defined around intended outcomes. Principles can be structured according to their intended outcomes, so that each principle refers to a precise intended outcome. Under this proposal principles would state outcome-level results (not activities), with few, non-overlapping topics covering environment, social, and economic outcomes.

Example

Principle 9 relates to High Conservation Values (HCV) for which the 6 categories relate to different sustainability outcomes (e.g. biodiversity, landscapes, ecosystem services, social and cultural values.). Principle 9 could be redesigned so that each HCV category would fall under another Principle that relate to the corresponding sustainability outcome. For instance, HCV 1 (Species diversity) could be moved to the principle for which the intended outcome relates to biodiversity conservation.

The logic behind the formulation of the criteria within a given principle is also not consistent in the current P&C. In some cases, several criteria under one principle work together to achieve a single outcome. In other cases, each criterion under a principle is linked to its own separated outcome. In some criteria under a given principle, multiple criteria are supposed to contribute to single outcome, while in some criteria under another given principle, each criterion is supposed to contribute to single outcome.

Example

In Principle 9, the criteria are designed to build on each other in a logical sequence. This sequence acts like a small results chain:

1. The first criteria focus on activities (e.g., identifying and assessing X).
2. Later criteria build on these and focus on outcomes (e.g., maintaining X).

Criteria can be formulated as a single intended outcome, and this would imply that criteria under each principle would need to clearly contribute to achieving the intended outcome of the principle (i.e. main intended outcome). In addition, to keep consistency and clarity, only one intended outcome would be assigned to a criterion. This will simplify, increase the clarity and focus on the scope of each criteria, which should in turn facilitate the subsequent implementation and evaluation of requirements. The formulation of criteria as intended outcomes could focus on the results to be achieved (e.g., The presence of rare and threatened species is maintained), instead of describing forest management activities (e.g., Measures to prevent hunting of rare and threatened species are implemented), which are more appropriately captured in the formulation of IGIs.

Question

10. *To what extent do you agree with formulate and design the principles and criteria around intended outcomes? (1 –Strongly disagree, 5 – Strongly agree)*

1.3 Making the PCI outcome-oriented: designing the IGI towards intended outcomes

Currently, the IGI are formulated as binary (yes/no), field usable verifiers, that serve the assurance as certification requirements. If criteria are structured around intended outcomes, as the FSC Secretariat suggests, a logical and coherent way to design IGI is to specify the activities clearly contributing to achieve the intermediate intended outcomes (i.e. at the Criteria level). This will make the IGI complement the P&C if they are formulated and designed around intended outcomes. Important note that this proposal does not move away from the current IGI formulation (binary), but it rather introduces a safeguard to ensure that IGIs are drafted in a way that clearly links forest management activities to the intended outcomes at the Criteria level. In other words, IGIs will continue to be clear, verifiable requirements, but with an added emphasis on their contribution to achieving intermediate intended outcomes.

The benefits of this suggestion include:

1. Keep the consistency with how the current IGI work in terms of assurance requirements.
2. Focus on IGI that are clearly contributing to outcomes.
3. Contribute to an optimum balance between the cost of implementation and the need to measure progress towards outcomes by introducing monitoring indicators. These monitoring indicators are addressed under the revision of Requirements for the Development and Maintenance of FSC Country Requirements and FSC-PRO-60-006a where 3-5 key intended outcomes are to be prioritized. This assumes that IGI specifying activities provide the most cost-effective way to define certification requirements and allow conformance evaluations.

Example 1

An example of Principle 2, and Criterion 2.3 is presented below

Current wording

Criterion 2.3. The Organization* shall implement health and safety practices to protect workers* from occupational safety and health hazards. These practices shall, proportionate to scale, intensity and risk*

of management activities, meet or exceed the recommendations of the International Labour Organization (ILO) Code of Practice on Safety and Health in Forestry Work. (C4.2 P&C V4)

Intended outcome

Workers have safe working conditions.

Example 2

An example of activity-IGI that does not contribute to the outcome is presented below:

- **2.3.4** Records are kept on health and safety practices including accident rates and lost time to accidents.
- Why does it not contribute to the outcome: Record-keeping supports assurance and learning, but even perfect records don't change exposure or behavior unless they trigger protective actions.

Example of activity-IGI that does contribute to the outcome:

- **2.3.3** Use of personal protective equipment is enforced.
- Why it contributes to the outcome: If enforcement is effective, exposure to hazards (e.g., chainsaw injuries, chemical splashes, noise) drops immediately—this action causally reduces probability and severity of harm.

Question

11. *To what extent do you agree that IGI should be clear, verifiable requirements (binary), while being drafted to specify forest management activities that contribute to the relevant intermediate intended outcome? (1 –Strongly disagree, 5 – Strongly agree)*

Open feedback

12. *Do you have any additional comments, suggestions, or feedback regarding on this section on outcome-oriented approach for structuring the PCI?*

Note: this topic relates to the section 6.2 on the Proposed new structure of the PCI.

2. Scope of Application

FSC currently applies a broad interpretation of scope of FSC certification under its P&C. This inclusive approach allows certification of areas primarily covered by trees, including natural forests, plantations, and certain non-forest vegetation types. Such flexibility aims to support FSC's mission of promoting responsible forest management across diverse ecological and socio-economic contexts.

The scope of application for the P&C is outlined in the latest version (V5-3). Table below summarizes the different scopes of application for the current P&C:

Scope of application	Description
Activities	The Organization's management activities related to Management Unit (MU) within and beyond MU, whether directly undertaken or contracted out.
Geography	Within and beyond the boundary of MU (except areas in MU which used as agricultural production systems).
Vegetation types	Natural forests, plantations, and other (i.e. non-forest) vegetation types*. *other vegetation types is limited to those land-uses involving growing of trees, but includes, in principles 'non-forest' land-uses as they contribute to the mission of FSC.
Products	Wood and non-timber forest products (NTFP).
Services	Conservation, protection, ecosystem services and other uses.
Users	Large companies, smallholders, communities, Indigenous People, traditional peoples, government, others.
Law	Complement and to be used in conjunction with international, national and local laws and regulations.

Table 2: Scope of application of the current P&C

The Green Paper on Scope, Applicability, and Usability identified two main challenges regarding the scope and applicability of the P&C: one concerning vegetation types and the other related to the eligibility of urban forest certification. In this consultation, the Secretariat seeks stakeholder feedback on the two conceptual proposals for change.

2.1 Vegetation Types

Currently, the eligibility of vegetation types for FSC certification is assessed on a case-by-case basis, considering the species involved, the production system, and their relation to the ecosystem functions and environmental values required by P&C. To support these assessments, the Glossary of Terms of the P&C provides working definitions of forest, natural forests, and plantations which serve as the foundation for these assessments.

Over time, FSC has broadened its scope by introducing Advice Notes to clarify the inclusion of non-traditional vegetation types. For example, ADVICE-20-007-001 Scope of forest certification confirmed that bamboo, rubber, orchards, agroforestry systems, and Christmas tree plantations are eligible for FSC certification. This scope has further included systems such as agroforestry, NTFP plantations (e.g., rubber, oil palm, orchards, silvo-pastoral systems), and very short rotation crops (e.g., Norway spruce, *Salix* spp., *Populus* spp.).

Despite the broadening of scope, the FSC Board reaffirmed a restrictive application of FSC-POL-01-004 V3-0 Policy for Association in 2018 (Board of Directors meeting 78), particularly for conversion cases involving oil palm and other plantation crops.

Feedback from Green Paper on Scope, Applicability, and Usability identified areas requiring clarification in the PCI revision. The key issues raised about the eligibility of certification, are as follows:

1. Short-rotation plantations are generally unlikely to meet several P&C requirements (specifically Criteria 6.2-6.4 and 10.1-10.5) and typically not certifiable on their own, though they may be eligible if integrated within a larger certified management unit.
2. Woody agricultural crops grown primarily for non-timber products: Ongoing uncertainty about their classification as forests or plantations under FSC.
3. Agroforestry models (e.g., *Taungya* systems): Crops cultivated during early plantation establishment, may be recognized as forests; however, uncertainty arises for plantations of woody plants primarily grown for non-timber products.

Addressing these ambiguities through clearer definitions and guidance in the PCI revision will help ensure consistency, maintain conformity with FSC's principles, criteria and indicators, and provide certificate holders with a more predictable framework for certification eligibility.

Question:

13. *To what extent do you agree that updating the current definitions of forests and non-forest vegetation is necessary to proactively inform users about the eligibility for the scope of certification? (1- Strongly disagree, 5- Strongly agree)*
14. *To what extent, do you agree with the current normative approach of maintaining flexibility in decision-making through case-by-case assessment? (1- Strongly disagree, 5- Strongly agree)*

2.2 Urban Forests

FSC has successfully certified several urban forests, with notable examples including Riga (Latvia) and European municipalities such as Paris, Lisbon, and Amsterdam. An internal FSC procedure also exists to assess the eligibility of non-forest vegetation types for Forest Management Certification. For reference, the FAO Guidelines on Urban and Peri-Urban Forestry (Forestry Paper No. 178) classify urban forests into five categories:

1. Peri-urban forests and woodlands
2. Large urban parks and forests (>0.5 ha)
3. Small urban parks (<0.5 ha) and gardens
4. Street trees and trees in public squares
5. Other treed sites such as cemeteries, sports fields, hospital grounds

Currently, under the PCI, the certifiable urban forest types include peri-urban forests and woodlands and large urban parks and forests (> 0.5 ha).

Meanwhile, the non-certifiable urban forest types include:

1. small urban parks (< 0.5 ha) and gardens;
2. Street trees, and trees in public squares, among others.
3. Other treed sites, such as cemeteries, sports fields, hospital grounds, among others

FSC is seeking stakeholder feedback on its future approach and scope. The Secretariat is interested in whether limiting certification to classes (1) and (2) as currently done is appropriate, and whether there may be opportunities to expand certification to other urban tree categories in the future.

Question

15. To what extent do you agree with the current normative approach of maintaining certification limited to (a) Peri-urban forests and (b) Large city parks? (1- Strongly disagree, 5- Strongly agree).

Open feedback

16. Do you have any additional comments, suggestions, or feedback regarding the section on Scope of Application of PCI?

3. Social Requirements

This revision process reinforces and reaffirms the core social values of FSC. It strengthens FSC's commitment to upholding the rights of Indigenous Peoples and Traditional Peoples by solidifying requirements related to Free, Prior and Informed Consent (FPIC). It will also strengthen FSC's commitment to local communities and traditional peoples, by improving definitions, such as that of *local communities*, to enhance clarity and inclusivity.

Regarding workers' rights, the revision aims to update existing requirements to reflect recent developments in international legislation, including relevant International Labour Organization (ILO) conventions.

It also marks a critical step forward in advancing FSC's commitment to gender equality. This PCI revision aims to explore how gender equality considerations can be integrated into FSC's Forest Management Certification, in alignment with the FSC Global Strategy (2021-2026) and the FSC Strategic Framework on Diversity and Gender.

3.1 Gender Equality

Three worldwide major trends in gender mainstreaming have been identified as outlined below:

Growing recognition of diversity and intersectionality:

There is increasing awareness of the need to integrate intersectionality, recognizing overlapping identities, such as gender, age, indigeneity, or disability, and others and how these intersections affect individuals' experiences, risks, and opportunities. This growing understanding is leading to the incorporation of broader aspects of diversity into sustainability frameworks. It includes the recognition of non-binary gender identities, the consideration of gender-specific health and safety needs, and greater inclusivity for persons with disabilities.

Increasing shift toward proactive measures:

There is a growing emphasis on implementing proactive strategies to promote gender equality beyond just "no discrimination". This includes ensuring equal access to training opportunities for both men and women, developing specific criteria and indicators that support the meaningful participation of Indigenous women and women in local communities in decision-making processes, and recognizing the importance of securing land tenure for women, along with ensuring the equal and fair distribution of benefits derived from both commercial and non-commercial activities in the forest.

Increasing adoption of transformative implementation frameworks:

There is increasing awareness on the need to incorporate systemic implementation frameworks, such as frameworks adopting a risk-based approach to identifying, preventing and remedying gender inequalities within operations and supply chains. Examples include the recently developed ISO 53800:2024 – Guidelines for the Promotion and Implementation of Gender Equality and Women's Empowerment – or Human Rights Due Diligence (HRDD) frameworks and the ILO Violence and Harassment Convention.

Currently, gender equality considerations are insufficiently integrated into key areas such as management planning (Criteria 7.1–7.6; Annexes E and F), as well as impact monitoring and adaptive management (Criteria 8.1–8.5; Annex G). Strengthening these elements is essential for embedding gender equality in a meaningful and measurable way across all stages of forest management.

These elements are not explicitly addressed in the current PCI, representing a gap to incorporate a gender equality approach into these documents.

The following options are proposed to integrate a gender equality approach into the PCI revision:

1. Include inclusive language in PCI requirements.

Example 1. The revised PCI could incorporate specific gender-related indicators related to Indigenous Peoples' Rights and local communities.

Example 2. The revised PCI could address the prevention of Gender-based Violence and Harassment (GBVH), for instance by expanding related requirements.

Example 3. The revised PCI could update the definitions of key terms such as gender equity and gender equality. For example, they could include definitions of "Intersectionality" and "Gender-based Violence and Harassment (GBVH)" in the PCI section on Glossary of Terms and [FSC-STD-01-002 Glossary of Terms](#).

2. Include a risk-based approach to gender in PCI requirements

Example: The revised PCI could require The Organization to incorporate a risk-based approach to identify, collect and monitor data, prevent, and remedy gender inequalities within its operations and supply chains.

3. Require active steps towards inclusion.

Example: The revised PCI could require The Organization to take active steps to promote inclusive employment, leadership and decision-making.

4. Gender-balanced benefit sharing

Example: The revised PCI could require The Organization to demonstrate that the benefits from the forests are distributed equitably.

5. Adopt a comprehensive approach by integrating all the above strategies into the PCI revision to have a combined system plus action approach which is consistent with the FSC Strategic Framework on Gender and Diversity.

Question

17. How should FSC strengthen the integration of gender equality in the revision of the PCI? (Select one or more options)

- a) Option 1. Include inclusive language in PCI requirements
- b) Option 2. Reflect systemic implementation framework (based on HRDD or ISO 53800:2024)
- c) Option 3. Require active steps towards inclusion measures.
- d) Option 4. Gender-balanced benefit sharing
- e) Option 5. Adopt a comprehensive approach by integrating all the above strategies into the PCI revision to have a combined system plus action approach which is consistent with the FSC Strategic Framework on Gender and Diversity.
- f) None of the above

3.2 Indigenous Peoples living in Voluntary Isolation

Protecting, respecting, and upholding the rights of Indigenous Peoples is an integral component of the FSC systems. To achieve this, FSC has embedded the right to Free, Prior and Informed Consent (FPIC) at the core of FSC's normative framework, thereby emphasizing the importance of engagement, involvement and consent of rights holders, including Indigenous Peoples.

However, this principle cannot be applied in the context of Indigenous Peoples living in Voluntary Isolation (IPVIs) due to their right and decision to remain uncontacted. This represents a gap in FSC's

existing normative framework, which FSC is actively working to bridge through the development of a draft advice note and the ongoing PCI revision. FSC is committed to taking decisive action to safeguard the territories of IPVIs, uphold the principle of no contact, and ensure that any engagement is preceded by appropriate consultation with the responsible stakeholders.

Question

18. To what extent, do you agree that FSC should incorporate requirements of the Indigenous Peoples living in voluntary isolation within the PCI? (1- Strongly disagree, 5- Strongly agree)

Open feedback

19. Do you have any additional comments, suggestions, or feedback regarding the section on Social Requirements in the PCI revision?

4. Climate Change and Biodiversity Conservation

Consultation Note: In August 2025 consultation on the draft Climate and Biodiversity Strategic Framework (CBSF) closed, and the process is ongoing. The PCI revision process will align with the requirements in the final CBSF.

Climate change and biodiversity loss are interconnected crises threatening life on Earth, with forests playing a central role. FSC's promotion of healthy, resilient forests already supports mitigation, adaptation, and conservation. However, the scale of today's challenges calls for a more systematic approach. Members have consistently called for stronger leadership on these issues, as reflected in General Assembly motions. FSC's Climate and Biodiversity Strategic Framework (CBSF) 2026–2032 (in development) will respond to that call, aiming to clarify, strengthen and systematize FSC's role in addressing the ongoing climate and biodiversity crises. The draft vision of CBSF in Draft 1 is "The world's forests are leveraged to mitigate and adapt to climate change, maintain and enhance biodiversity, while empowering forest-dependent people and communities to thrive". In line with this vision, PCI revision aims to strengthen FSC's role in climate change and biodiversity loss.

4.1 Climate Change

Forests are essential for climate action, storing carbon, providing renewable materials, and helping ecosystems adapt to impacts. Yet climate change threatens forest health and resilience through rising temperatures, extreme weather, and pests, while also intensifying risks for Indigenous Peoples, local communities, forest workers, and women. Securing rights, ensuring FPIC, and supporting Indigenous-led initiatives are key to achieving global climate and biodiversity goals.

The existing PCI already contain elements that indirectly support climate action (e.g., environmental values under Principle 6, hazard management under Principle 10, planning and monitoring under Principle 7 and Principle 8). FSC forest management standards could be strengthened to address climate risks (wildfires, pests, droughts), include standardized methods for measuring carbon benefits within certification and embedding intended climate outcomes directly into the standards, in line with the feedback received, and the CBSF (Draft 1-0) which stress the need for explicit climate outcomes and evidence of impact. Therefore, this PCI revision aims to:

1. Include provisions for climate adaptation and mitigation.
2. Facilitate restoration of degraded forests for climate benefits.
3. Integrate Indigenous Peoples' and local communities' knowledge that contribute to climate adaptation and mitigation, into forest management plans and practices.
4. Require collection and reporting of data on climate outcomes.

Example:

The revised PCI documents are therefore proposed to (with proportionate requirements through Scale, Intensity and Risk - SIR):

1. Integrate climate adaptation and mitigation into forest management planning and monitoring and extend these measures to key aspects of climate-smart management (e.g. related to fire, regeneration, high-carbon features, worker/community resilience).
2. Define clear intended outcomes for climate change adaptation (e.g. climate risks are defined and accounted for through adaptation measures) and mitigation (e.g. carbon storage is maintained and/or enhanced, carbon emissions are reduced), including data collection and reporting.

3. Define provisions for documentation and recognition of Indigenous Peoples and local communities' knowledge (through their consent), and integration into forest management plans and practices.

Question:

20. To what extent do you agree that the revised PCI should include explicit requirements for climate change adaptation and mitigation as exemplified above? (1 – Strongly disagree, 5 – Strongly agree).

4.2 Biodiversity Conservation

Although biodiversity conservation is already central to the current PCI, the draft 1-0 of CBSF, FSC member surveys on general aspects related to PCI revision, stakeholder feedback, and Green paper on Climate Change and Biodiversity, highlight redundancies, in addition to a lack of provisions for direct mechanisms to demonstrate its outcomes on biodiversity conservation. Such provisions would enable capturing, verifying, tracking and communicating the outcomes on biodiversity from responsible forest management. Therefore, this PCI revision aims to develop standardized and robust biodiversity indicators, to enhance its ability to monitor biodiversity outcomes and better align with global targets such as the Global Biodiversity Framework (GBF) Targets 1 (spatial planning), 2 (restoration), and 3 (protected area coverage) through:

1. Consolidating and streamlining biodiversity-related requirements to reduce redundancy and fragmentation, while keeping strong safeguards.
2. Developing standardized biodiversity indicators that allow monitoring, verification, and communication of outcomes from responsible forest management.
3. Strengthening links between biodiversity conservation and restoration of degraded ecosystems, emphasizing measurable biodiversity gains.
4. Incorporating the knowledge and practices of Indigenous Peoples and local communities into biodiversity management and monitoring approaches.

Question:

21. To what extent do you agree that the revised PCI should strengthen and streamline requirements to achieve measurable biodiversity outcomes, as exemplified in the points above? (1 – Strongly disagree, 5 – Strongly agree)

4.3 Forest Resilience

FSC's Global Strategy (2021-2026) outlines the 2050 vision of *Resilient Forests to Sustain Life on Earth*. To achieve this goal - and to support forests that generate environmental, social and economic value, FSC proposes integrating key concepts into the PCI documents to support practices that help forests adapt to and build resilience against the effects of climate change-related hazards (e.g. drought, wildfires, storms, pest/disease, among others). FSC's current PCI already embed many aspects of climate resilience through planning, conservation, hazard management, operations, worker safety, and community provisions. The Secretariat proposes to make the requirements more explicit regarding forest resilience against the negative effects of climate change. This approach, as highlighted in the Green paper on Climate Change and Biodiversity, is a direct response to the finding that the current standard lacks clarity and specific tools for climate resilience. The intention is to build upon and strengthen existing requirements rather than introducing entirely new concepts.

The examples provided in the options below, reflect widely applicable practices, while methods to achieve them will remain flexible and proportionate to SIR, verified through simple verifiers rather than prescriptive practices.

1. Structural heterogeneity and retention: e.g., variable density/age structure; legacy trees/habitat features maintained and restored (implicit in IGI 6.8.1 and 6.8.2).

2. Wildfire risk reduction e.g., explicit integration of an Integrated Fire Management approach
3. Climate-smart remedy/restoration: e.g., post-fire regeneration prioritizing natural regeneration, towards enhancing climate-resistant forest regeneration.
4. Water and soil resilience: e.g., low-impact operations in high-risk areas (susceptible to climate change effects) to avoid erosion and compaction (implicit in P&C C6.7 and C10.10).

Question

22. *To what extent do you agree that FSC should make its requirements more explicit in promoting forest resilience against the negative effects of climate change? (1 – Strongly disagree, 5 – Strongly agree).*

Open feedback

23. *Do you have any additional comments, suggestions, or feedback regarding the section on climate change, biodiversity conservation, and forest resilience in the PCI revision?*

5. Intact Forest Landscapes

Consultation Note: In March 2025 the FSC Board of Directors agreed embarking on a new strategic approach to IFL conservation. The PCI revision process will ensure alignment with this strategic approach. A discussion paper on the strategic approach will be released before FSC's General Assembly in 2025 to initiate the member dialogue.

FSC recognizes forests as vital for biodiversity, climate regulation, Indigenous livelihoods, economic resources, and more. Intact Forest Landscapes (IFLs), defined in the early 2000s as large, minimally disturbed forests, hold exceptional ecological value but are controversial. Critics argue the concept reflects a Western view that separates people from nature, overlooks Indigenous stewardship, and restricts economic use, especially timber harvesting.

In 2014, FSC members committed to protecting IFLs, but balancing conservation with the economic needs of certificate holders has proven difficult. This tension has led to temporary measures and ongoing debate. Environmental groups demand stronger protection, while certificate holders struggle with limits to sustainable use and/or legal constraints related to government concessions.

Until now, FSC's solution to certify forest management units overlapping with IFLs has been to establish a single global level of protection of the IFL area within the certified area. The current rule sets a default protection threshold of 80% within the Management Unit across all countries and regions. Two exceptions apply:

1. Standard development group are allowed to lower the protection threshold up to +50% when developing a Forest Stewardship Standard (FSS) based on IGI V2 and following FSC-GUI-60-004 V1-0 Guidance for SDG to Develop a National Threshold for the Core Area of Intact Forest Landscapes within the Management Unit.
2. Forest management operations in countries where there is no FSS based on IGI V2 may proceed on a need's basis to lower the threshold from 80% to +50%, if additional conditions in the ADVISE-20-007-18 V3-0 Protection of intact Forest Landscapes are met. Applies only to operations in Latin America or Central Africa who have held FM or FM/CoC certification since at least 14 October 2022.

In March 2025, the FSC Board of Directors requested to develop a new strategic approach to IFLs, incorporating member motions and preparing for dialogues ahead of the 2025 General Assembly.

As requested by the FSC Board of Directors, this new approach explores the overall role that FSC can play in the definition, management and protection of IFLs, extending beyond the instrument of certification. Any resulting changes from this process will be integrated into the PCI revision. In the current consultation on the PCI revision, the Secretariats seeks specific feedback on an immediate challenge of using protection threshold in the IFL concept, to guide the implementation of past motions, as well as motions submitted for the upcoming General Assembly.

Question

24. *To what extent, do you agree that FSC should maintain the protection threshold approach for IFLs within the PCI? (1- Strongly disagree, 5- Strongly agree)*

Open feedback

25. *Do you have any additional comments, suggestions, or feedback regarding the section on Intact Forest Landscape in the PCI revision?*

6. User Orientation

For over 30 years, FSC's P&C have provided a robust and reliable foundation for responsible forest management worldwide. This enduring framework has enabled FSC to drive meaningful impact across diverse landscapes and stakeholder groups. However, as global challenges evolve and stakeholder expectations grow more complex, it has become increasingly clear that the current structure of the PCI could benefit from refinement to better meet the demands of the fast-evolving trends.

Insights from the Joint Review Report, FSC member surveys on general aspects related to PCI revision, stakeholder feedback, green papers developed during the P&C revision process, relevant motions, and the FSC Global Strategy (2021–2026) have consistently highlighted opportunities to enhance user orientation, outcome focus, and overall usability. In response, FSC is exploring structural options that aim to streamline the P&C while strengthening its auditability, traceability, and relevance ensuring it remains a powerful tool for delivering positive outcomes in forest stewardship ensuring it remains a powerful tool for delivering positive outcomes in forest stewardship.

6.1 The Purpose of the IGI

At its March 2015 meeting, the FSC Board of Directors approved, by consensus, the IGI as the starting point for developing Forest Stewardship Standards. The IGI provide global consistency while aiming to minimize regional imbalances.

According to the current version of the IGI standard development groups shall consider the full set of IGI and the accompanying instructions with the option to adopt, adapt, drop or add indicators as appropriate and relevant at the country level. This flexibility enables adaptation to country-specific contexts, supporting FSC's commitment to ensuring its standards are both locally relevant and globally consistent.

While the IGI themselves do not constitute conformance with accreditation requirements, they support FSC's overall system, facilitating alignment with frameworks such as the accreditation body in Germany (DAkkS) and the International Social and Environmental Accreditation and Labelling Alliance (ISEAL) Code of Good Practice.

For example, the ISEAL Code of Good Practice requires that standards be relevant to the country contexts in which they are applied. This includes considering local economic, social, environmental, and regulatory conditions, and involving local stakeholders in adapting or interpreting the standards. By following the ISEAL Code, FSC ensures its systems are inclusive, science-based, and regularly reviewed.

Question

26. Do you agree with retaining the purpose of the IGI as the starting point for developing country adaptations? (Yes/No)

6.2 Proposed New Structure of PCI

To guide the development and evaluation of proposed options for PCI structures, a clear analytical framework is used considering three key factors. Each factor is defined below and described in the context of the PCI revision. In this consultation we seek your input on the factors below:

1. **Streamlining:** A streamlined structure is defined as a way to improve accessibility, enhance coherence and efficiency while reducing redundancy and complexity of FSC requirements. 'User-orientation' and 'outcome-orientation' are important conditions for streamlining.
2. **User-orientation:** This means that the requirements are easy to understand and apply consistently by its primary users (current certificate holders; prospective applicants of forest management certification) as well as secondary users such as certification bodies, Indigenous Peoples, local communities – both

during implementation and auditing. A user-oriented PCI aims to reduce the burden of implementation for forest managers and auditors by supporting the user's workflow (e.g., forest management activities, facilitating comprehension, and simplifying the verification process, without lowering the rigour.

3. **Outcome-orientation:** Outcome orientation means that the development and implementation of standards is guided by a few prioritized key intended outcomes, and that progress against these is demonstrated. Through outcome-orientation the standards are re-centred around results rather than the processes. This approach leverages a "theory of change" model, framing the principles as explicit, measurable set of intended outcomes that contribute directly to FSC's vision of resilient forests. For example, the principles are statements of intended outcomes, clearly separated from the processes required to achieve them, aligned with the revision process of Requirements for the Development and Maintenance of FSC Country Requirements and FSC-PRO-60-006a. Noting that outcome-orientation does not mean that certificate holders must necessarily achieve intended outcomes to obtain or maintain conformity with the standard, but rather that they demonstrate the practices and monitoring required to support progress towards them.

A hypothetical example of a proposed PCI structure - developed based the three factors above – is exemplified in Figure 3. The structure is streamlined, featuring a reduced number of principles and criteria resulting from the thematic consolidation and process flows; outcome-oriented with principles defined as intended outcomes; and user-oriented, incorporating a process-based, workflow-type relationship between relevant principles and criteria. FSC considers Indigenous Peoples, traditional communities and local communities as separate entities, and the proposed new structure will also conform with this approach.

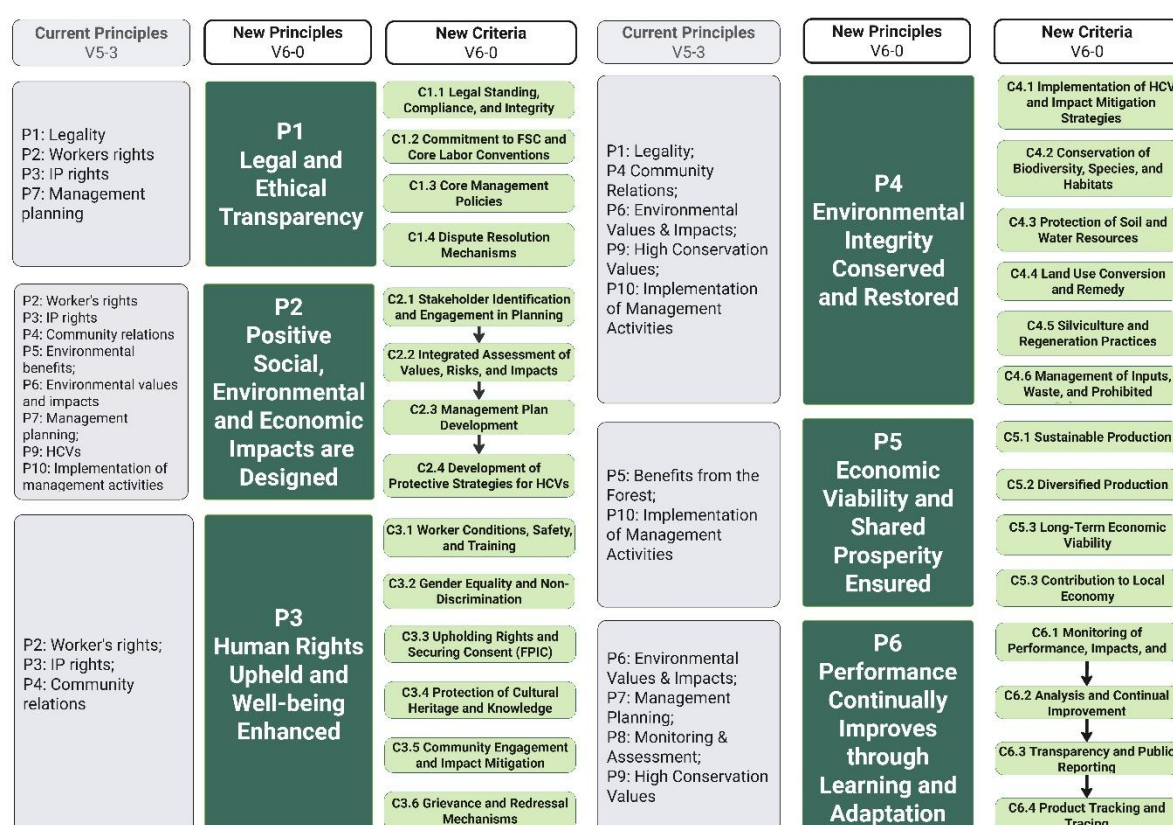


Figure 3. Hypothetical new PCI structure

The Secretariat is now seeking your feedback to guide the next phase of this critical work.

Questions

27. *Given the global challenges and opportunities identified for the PCI revision (e.g., improving user-orientation, outcome focus, and overall usability while maintaining rigor, auditability, and traceability), to what extent do you agree that the process should explore restructuring the PCI? (1- Strongly disagree and 5- Strongly agree)*
28. *The proposed revision of the PCI structure identifies three important factors (with their definitions). Please rate those factors below that you would consider important when developing the new PCI structure on a scale of 1 to 5 (1 being lowest importance and 5 being highest importance)*
- 28.1. *User-oriented (Scale 1 to 5)*
- 28.2. *Outcome-oriented (Scale 1 to 5)*
- 28.3. *Streamlined (Scale 1 to 5)*
- 28.4. *A balanced structure based on above 3 factors (as exemplified in figure) (Scale 1 to 5)*

Note: the factor “Outcome-oriented” relates to the proposals presented in the section 1 on Outcome orientation.

6.3 Modular Approach

Feedback from FSC members’ survey and the Green Paper on Scope, Applicability, and Usability, indicates that the current PCI structure is perceived as a one-size-fits-all approach, that often has limitations to reflect the diversity of global forest ecosystems and management practices. The main feedback highlights that current country adaptations can lead to some inconsistencies across countries, meaning that similar forests may be treated differently. This can sometimes create challenges for certificate holders operating in multiple regions. Additionally, certain standards may not fully reflect local conditions, which can make it less clear for small producers or regions without dedicated standard developers to understand conformity requirements.

This revision therefore aims to establish a consistent, modular structure that is easier for certificate holders and standard developers to use and adapt at country and regional levels. This PCI revision seeks to move away from a one-size-fits-all approach toward a modular structure organized around the following steps:

1. Identify core indicators that are universal requirements applicable in all contexts.
2. Identify distinct sets of requirements using specific contexts:
Requirements could include a core set of universal requirements, with additional ones depending on the specific context (Figure 4). Suggested context may include, but are not limited to:
 - User type: The Organizations, certificate holders (e.g., large companies; Small or Low-Intensity Managed Forests (SLIMF); community-managed forests; governments and Indigenous Peoples).
 - Vegetation types: e.g., natural forests, semi-natural forest, plantations, other vegetation types (e.g., short-crop rotation, agroforestry, urban forests etc.)
 - Products: Timber and non-timber forest products (NTFPs)
 - Services: Production, conservation, ecosystem services.
3. Support future integration with digital tools and systems. This might require a reorganization and reformulation of the current PCI structure. The adjustment may improve how the PCI is structured and written, making it more compatible with digital platforms and easier to use in digital audits, data collection, and automated systems.

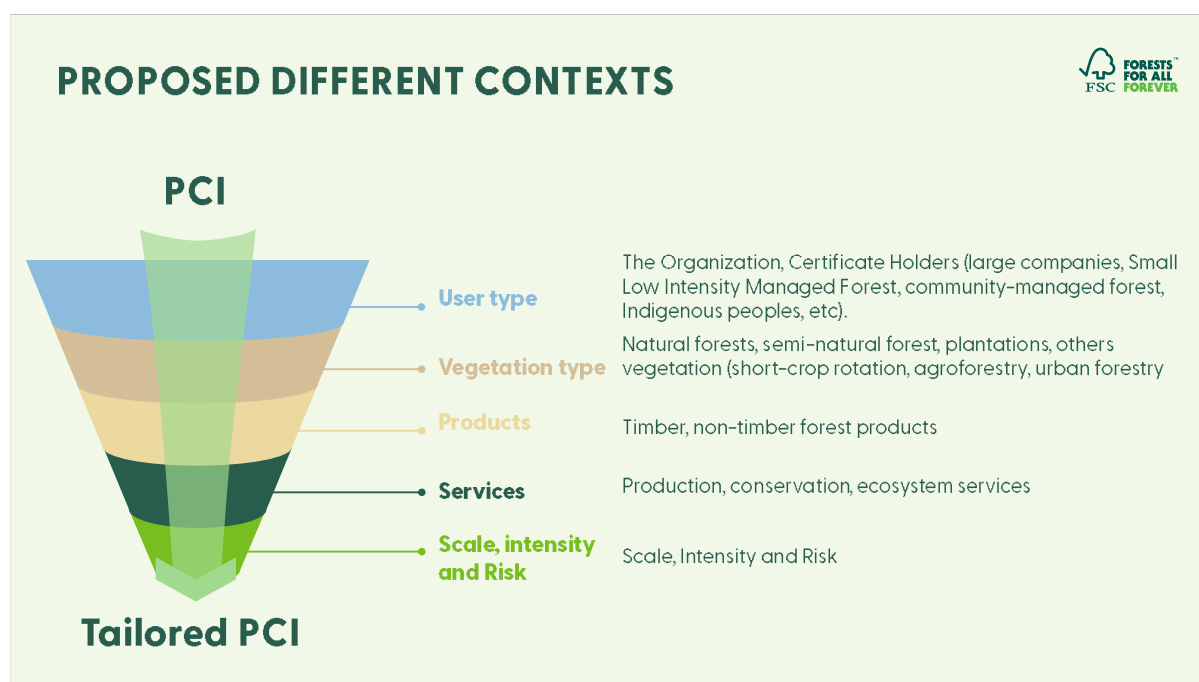


Figure 4. Proposed different contexts

The modular approach makes the applicability of given requirements explicit and reduces arbitrary cross-country differences for certificate holders and auditors. Defined contexts enable instant scoping and modular updates, while easing the workload of standard developers. This enhances global coherence while maintaining local validation. Standard developers can select the set of modalities that best fits their country scope and context, allowing for a tailored application of requirements, as illustrated in Figure 5 below. In addition, this approach lays the groundwork for the digitization of FSC forest management standards.

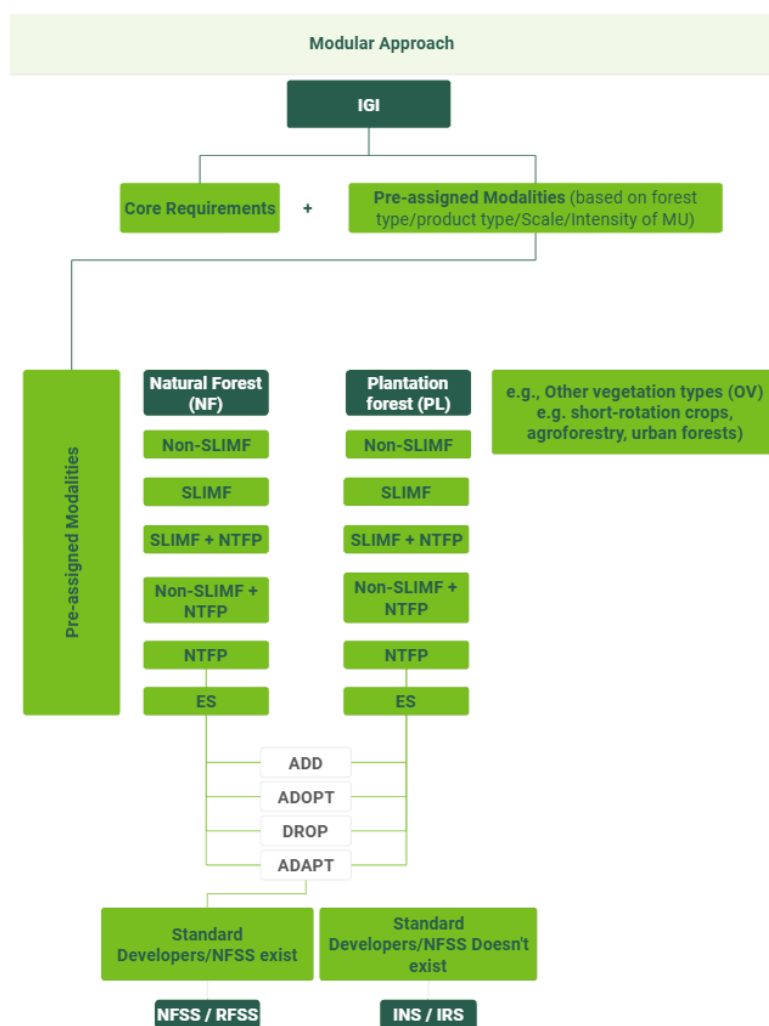


Figure 5. Hypothetical modular approach

Question

29. To what extent, do you support the introduction of modular approach in the PCI revision (Core indicators + pre-configured contexts) to better reflect diverse forest types, products, services, and user groups? (1 - Strongly disagree, 5 - Strongly agree)
30. To what extent, do you agree that the proposed context requirements (Users, Vegetation Types, Products, Services) are sufficient to tailor the requirements? (1 - Strongly disagree, 5 - Strongly agree)
31. To what extent do you agree that this PCI revision should explore pre-configuring contexts at the international level, allowing local validation and adaptation while maintaining consistency? (1 - Strongly disagree, 5 - Strongly agree)

Consultation Note: A parallel revision of requirements for the development and maintenance of FSC Country Requirements (FSS and FSC RAs); is also ongoing, depending on the results received on these consultation questions, the final draft might incorporate the provisions related to modular approaches.

6.4 Streamlining

The PCI were designed to facilitate responsible forest management across different contexts. However, feedback from the Joint Review Report and FSC member surveys on general aspects related to PCI revision, stakeholder feedback show that the current structure and language can be challenging for users to understand, interpret and implement effectively.

6.4.1 Redundancy and Repetitions

One of the goals of this revision process is to reduce redundancies and repetitions, improving the standard's clarity and ease of understanding for users. For instance, in the current P&C, there are cases where two or more normatively equivalent requirements can be expressed once without losing scope, rigour or stakeholder visibility which currently appear in different principles and subsequent criterion. Addressing these kinds of redundancies offers an opportunity to simplify the structure and improve usability of the standard, with same or stronger protection for each stakeholder group and value (workers, Indigenous Peoples, local communities, biodiversity/HCVs, among others).

Example

An example based on the existing P&C is shown below:

Grievance mechanisms and compensation: overlapping topics of current Principle 2 (Criterion 2.6) and Principle 4 (Criterion 4.6):

Criterion 2.6: The Organization through engagement with workers shall have mechanisms for resolving grievances and for providing fair compensation to workers for loss or damage to property, occupational diseases, or occupational injuries sustained while working for The Organization.

Criterion 4.6: The Organization, through engagement with local communities, shall have mechanisms for resolving grievances and providing fair compensation to local communities and individuals with regard to the impacts of management activities of The Organization.

Possible resolution of the overlap: One streamlined grievance framework covering workers and local communities to reduce fragmentation and allowing for a single mechanism.

Question

32. *To what extent do you agree with reducing redundancies and repetitive content across the PCI revision process, while ensuring that the visibility and recognition of different stakeholder groups is preserved? (1 – Strongly disagree, 5 – Strongly agree)*

6.4.2 Reduction of Annexes and Instruction for Standard Developers in PCI

To achieve the goal of streamlining within the PCI, it is proposed to reduce the number of Annexes, particularly within the IGI (Table 3), and to reduce instructions that are specifically directed at standard developers. These requirements are already being addressed through the ongoing revision of key normative documents, including the Requirements for the Development and Maintenance of FSC Country Requirements, the FSC Risk Assessments, and FSC-PRO-60-006a: Structure and Content of Forest Stewardship Standards. This approach aims to be more consistent across normative framework, avoid duplication, enhance coherence, thereby, supporting a more streamlined and user-oriented framework.

Currently, the IGI contain the following Annexes:

Annex	Title	Principle
Annex A	Minimum list of applicable laws, regulations and nationally ratified international treaties, conventions and agreements	Principle 1
Annex B	Training requirements for workers	Principle 2
Annex C	Additional Requirements for Ecosystem Services	Principle 5
Annex D	Conservation Area Network* Conceptual Diagram	Principle 6

Annex	Title	Principle
Annex E	Elements of the Management Plan	Principle 7
Annex F	Conceptual Framework for Planning and Monitoring	Principle 7
Annex G	Monitoring Requirements	Principle 8
Annex H	Instructions for Standards Development Groups to develop indicators for Intact Forest Landscape* Core Areas	Principle 9
Annex I	Strategies for maintaining High Conservation Values	Principle 9
Annex J	International Generic Indicators for the use and risk management of highly hazardous pesticides*	Principle 10

Table 3: List of Annexes in IGI document

Question

33. *To what extent, do you agree to reevaluate the need of each annex - including their number and structure- to avoid duplicative content across the normative framework? (1-Strongly disagree, 5 – strongly agree)*

Open feedback

34. *Do you have any additional comments, suggestions, or feedback regarding this section on user orientation?*

7. Policy on Excision

The current FSC-POL-20-003 V1-0 FSC Policy on the Excision of Areas from the Scope of Certification allows the possibility for certificate holders to excise, or exclude, specific areas from the scope of certification under two scenarios:

1. Where external factors - such as natural disasters, political conflict, or unauthorized activities - affect parts of the Management Unit in ways that are beyond the full control of the forest managers, thereby preventing conformance with FSC certification requirements.
2. When certain parts of a Management Unit are managed with objectives that do not meet FSC certification requirements, but the forest managers wish to pursue certification for the remaining areas that do conform.

Since its approval in 2004, FSC's normative framework has advanced significantly, rendering much of the policy outdated. For example, the current P&C prohibits the conversion of natural forests or HCV areas, except under the "very limited portion" rules, and requires restitution through the FSC-PRO-01-007 V1-0 FSC Remedy Framework. Similarly, the IGI defines requirements to implement Criterion 6.3 by requiring organizations to identify, prevent, and mitigate negative environmental impacts. These developments render many of the general policy statements in the Policy on Excision redundant.

The Policy on Excision contains requirements directed to different user groups such as certificate holders, certification bodies, and standard developers. This dispersion leads to duplication and reduces coherence across these user groups. In line with FSC-PRO-01-001 V4-0 The Development and Revision of FSC Requirements which aims to ensure the continued relevance of normative documents, improve coherence, reduce redundancies, and phase out outdated documents, the Secretariat proposes integrating relevant clauses of this policy into the appropriate normative documents for each user group during the PCI revision process. Once all relevant content has been incorporated, the standalone policy will be withdrawn to support a more streamlined and coherent normative framework.

The proposals for incorporating the requirements are as follow:

3. The assurance-related requirements are proposed to be integrated into the FSC-STD-20-007 V4-1 Specific Requirements for Certification Bodies – Forest Management.
4. Requirements specifically directed at the standard developers are proposed to be incorporated into the revision of FSC-PRO-60-006a.
5. Finally, a few remaining requirements from the Policy on Excision specifically directed to certificate holders are proposed to be integrated into the PCI documents during PCI revision in addition to amending some existing criteria and indicators. A few examples below to demonstrate how such integration is proposed:
 - 3.1 adding a new Indicator 6.3.X of IGI to fully incorporate the specific requirements of managing factors beyond managerial control (to integrate Clause 3.1a-d of the Policy);
 - 3.2 adding a new criterion under existing Principle 10 of P&C: for The Organization to have a tracking and tracing system for products harvested from non-certified areas (including excised areas) within the Management Unit's administrative boundary and such products should be treated as non-FSC-certified (to integrate Clause 2.2d of the Policy).
 - 3.3 amending existing Indicator 1.2.3 of IGI to explicitly include clear documentation and mapping of excised area boundaries; amending existing Indicator 7.5.1 of IGI to require the public summary to include an explanation of excised areas and the rationale for their exclusion; amending existing Indicator 7.6.3 of IGI to specify that the proposal for excision must be included in the stakeholder consultation process (to integrate the Clauses 2.2b, 2.2e.i, 2.2e.ii, 2.2e.iv of the Policy).

This approach ensures that substantive requirements of the Policy on Excision-related requirements remain embedded in FSC's core normative documents while eliminating redundancies and clarifying accountability for different user groups as mentioned above.

Consultation Note: The draft requirements related to the standard developers are included in the Section 3.13 of draft FSC-PRO-60-006a V1-0 currently under consultation.

Question:

35. Do you support the proposal to integrate the requirements of Policy on Excision into the related normative documents specifically directed for various user groups as proposed above? (Under this proposed integration pathway, the current Policy would be withdrawn once its core elements are fully integrated into these normative documents, thereby streamlining FSC's overall normative framework):

Options:

- a) Yes, I fully support the proposal.*
- b) No, I do not support the proposal.*

Open feedback

36. Do you have any additional comments, suggestions, or feedback regarding the section on Policy on Excision?

8. Alignment of FSC's Normative Framework

This chapter sets out how this PCI revision aims to streamline and align the FSC normative framework. It consolidates and updates forest management related Advice Notes (ANs), Interpretations (INTs), and the Glossary of Terms section in the P&C and IGI to overcome redundancies, clarify applicability, and ensure consistent language across the P&C, IGIs, FSS, and related procedures to ultimately enhance user experience. The revision aims to integrate non-redundant content into higher-level documents, withdraw superseded items, and retain selected materials where needed - while updating definitions to eliminate misalignment.

8.1 Advice Notes and Interpretations

An Advice Note (AN) is an errata or addenda to normative document. An Interpretation (INT) is a formal normative clarification provided by the Secretariat to requirements included in the documents of FSC Normative Framework.

For forest management requirements (both are included in the scope of the current PCI revision process):

1. ANs are compiled in the FSC-DIR-20-007 FSC Directive on Forest Management Evaluations and are included within the scope of the current PCI revision process.
2. INTs, of PCI requirements, are compiled in Forest Management Interpretations (INT) and are also included within the scope of this revision process.

With the publication of the new version of FSC-STD-20-007 Specific Requirements for Certification Bodies – Forest Management and the ongoing PCI revision, many of the ANs and INTs have become redundant or will soon be replaced with the revised PCI. As part of the streamlining exercise, FSC Secretariat has reviewed ANs (FSC-DIR-20-007) and Forest Management Interpretations and proposed three scenarios for handling them in the ongoing PCI revision as exemplified below:

1. **Integrating** non-redundant requirements or guidance of ANs and INTs directly into the PCI, and related forest management normative documents, wherever applicable.
2. **Withdrawing** only redundant ANs and INTs where the requirements and guidance are already documented, superseded or redundant in relation to a higher-level normative document, wherever applicable.
3. **Retaining** requirements or guidance in ANs (in FSC-DIR-20-007) and Forest Management Interpretations, either (wherever applicable):
 - a. temporarily, to allow transition until revised PCI documents or new normative documents take effect, or
 - b. permanently, where the requirements or clarifications remain outside the scope of PCI revision but are still needed.

Table below illustrates some examples demonstrating rationale behind proposition of each scenario for various ANs and an INTs included in this streamlining, simplification and user-orientation exercise within the scope of PCI revision:

Normative reference	Integrate the elements in PCI	Retain in the ANs and INTs	Withdraw (as redundant or already covered)
FSC-DIR-20-007	ADVICE-20-007-04 clarifies industrial-scale extractives are outside FM scope and excised; only small-scale quarrying may occur with no HCV conversion and separate legal authorization - this is scope/excision clarification, not new requirements. In P&C V5-3, conversion/excision is covered by C6.9–6.11 and the cross-reference to FSC-POL-20-003; “no HCV loss/mitigation/rehabilitation” safeguards sit under P6/P9. Therefore, the AN content can be integrated as guidance/example: excision example in Criterion 6.10 – IGI 6.10.1; small-scale safeguards in P9 IGLs 9.1.1–9.3.3; add one-line guidance cross-reference under P1 (legality) and P3/P4 (FPIC).	ADVICE-20-007-18 V3-0 is the operative, system-wide baseline for Intact Forest Landscapes (IFLs); without it, P&C V5-3 / IGI V2-1 and NFSSs handle IFLs unevenly, leading to inconsistent protection requirements and audit expectations. Because thresholds, definitions, and mapping/management expectations for IFLs are not yet harmonized across the FSC system, the AN remains essential to ensure clear, consistent requirements in the interim. Therefore, this AN can be retained until the PCI revision (or a stand-alone normative document) delivers a durable policy/indicator solution and it’s embedded in P&C/IGI and NFSS.	ADVICE-20-007-08 was approved in 2005 and in P&C V4-0, with the inclusion of Criterion 5.6, the element of sustained yields was incorporated (currently under Criterion 5.2 of P&C V5-3; sustained yields and IGI V2-1; 5.2.1–5.2.3), therefore, this AN can be withdrawn.
Interpretations of the Normative Framework: Forest Management	INT-STD-60-004_04 introduces a new term and procedural provision related to persistent and vexatious complaints. This interpretation extends beyond clarification and has implications for the application of IGI V2-1 Indicators 1.6.1, 2.6.1, and 4.6.1, as well as the definition of “dispute.” Therefore, it can be integrated in next version P&C/IGI Terms and Definitions and can be inserted as guidance under IGI 1.6.1, 2.6.1, 4.6.1 to operationalize admissibility filters (including classification and rejection of persistent/vexatious complaints, with decision authority and timelines). The procedure outlined should also be formally embedded in FSC-PRO-01-008 Processing Complaints in the FSC Certification Scheme, to ensure consistent application across FSC entities and certification bodies.	INT-STD-01-001_18 (approved in January 2025) addresses Ukraine-specific restructuring of Specialized Forestry Enterprise (SFE) “Forests of Ukraine,” confirming that a single Forestry Unit may be certified if it meets the definition of The Organization, is organized as MU(s), and conforms to the Ukraine FSS. It instructs certification bodies to update scope and require the latest FSC License Agreement with uniform contracting-party naming, noting that SFE’s legal registration extends to its Forestry Units. As a jurisdiction-specific application already anchored P&C V5-3 Preamble Section 5; it should be retained as an interpretation and not integrated into PCI.	INT-STD-01-001_04 clarifies “permanently sustained yields” under P&C V4-0 Criterion 5.6 which allows short-term harvests above annual allowable cut limit (AAC) if the multi-year AAC is met or adjusted for unforeseen events. In P&C V5-3, this clarification is already reflected under Criterion 5.2 and operationalized in IGI 5.2.1–5.2.3 (harvest ≤ growth, long-term productivity, monitoring), rendering the interpretation redundant. Therefore, the INT can be withdrawn.

Table 4: Example of proposed scenarios for integration, withdrawal and retention of Advice Notes and Interpretations.

Question

37. To what extent do you agree with the proposal to consider these three defined scenarios (Withdraw, Retain, Integrate) during the PCI revision process for all Advice Notes in FSC-DIR-20-007 and Interpretations on Forest Management as part of PCI revision process for better alignment,

streamlining and user-friendliness within FSC normative framework? (1- Strongly disagree; 5- Strongly agree)

8.2 Glossary of Terms section

As part of the ongoing revision of PCI revision, the section on Glossary of Terms could also be updated to ensure that the existing definitions of various terminologies have a greater clarity, alignment, and consistency across FSC normative documents.

For example, FSC's definition of *conservation/protection*. Under the IGI, the definition is:

“Conservation/Protection: These words are used interchangeably when referring to management activities designed to maintain the identified environmental or cultural values in existence long-term. Management activities may range from zero or minimal interventions to a specified range of appropriate interventions and activities designed to maintain, or compatible with maintaining, these identified values (Source: FSC-STD-01-001 V5-3) “.

Treating conservation as synonymous with protection is particularly confusing, as these terms are generally understood to have distinct meanings outside of FSC documents and have implications for standard developers when developing Forest Stewardship Standards. ‘Protection’ means to cover or shield from exposure, injury, damage or destruction, while ‘conservation’ means a careful preservation and protection of something (Merriam-Webster Dictionary). The current PCI documents use these terms interchangeably but refers to “active conservation, not passive protection” for a distinction between the two, while FSC Remedy Framework ([FSC-PRO-01-004](#) and [FSC-PRO-01-007](#)) adopts a very similar definition for ‘conservation,’ but defines ‘protection’ in the context of restoration activities with reference to “activities commonly associated with the protection and maintenance of resources through the implementation of appropriate legal and physical mechanisms”. Although the overall difference between ‘conservation’ and ‘protection’ is hinted, the distinction is not readily present in these exemplified normative documents, leading to inconsistency and misunderstandings.

Question

38. *To promote alignment and consistent use of language to what extent do you agree to review the glossary of terms in PCI documents? (1- Strongly disagree, 5- Strongly agree)*

Open feedback

39. *Do you have any additional comments, suggestions, or feedback regarding the section on the Advice Notes for FSC Forest Management Evaluations, Forest Management Interpretations and PCI's Glossary of Terms?*

9. Genetically Modified Organisms

In February 2022 the FSC announced the start of a process to discuss GE (Genetic Engineering) outside of FSC certified area. The FSC Board of Directors appointed a Panel of Experts to provide advice on how a GE Learning Process could help FSC gain sufficient and trusted knowledge on developments in genetic engineering in forestry.

After a planned review of the GE Learning Process during their Board Meeting in March 2023, the FSC Board of Directors decided to discontinue the learning process. The decision considered the different views in FSC's membership around the learning process, the division this bring to FSC as well as the potential risk to FSC's mission and reputation.

FSC will continue to prohibit the use of genetically modified organisms (GMOs), and this PCI revision will not reopen that discussion. However, the definition of GMO is proposed to be reviewed and updated to reflect advancements in technology by explicitly including organisms altered by modern genetic engineering techniques (e.g. CRISPR). By reviewing its definition, FSC aims to continue addressing organisms developed through modern genetic technologies, reaffirm the prohibition of these technologies in certified operations, and uphold the intent of FSC's normative framework to prevent the use of GMO in ways that could compromise natural forest dynamics or ecosystem resilience. This is to ensure the overall FSC's approach on GMO is maintained.

Question

40. *Do you support revising the definition of "GMO" to ensure that the original intention of the requirement is maintained (to prevent the use of GMO in ways that could compromise natural forest dynamics or ecosystem resilience)? (Yes/No)*

Open feedback

41. *Do you have any additional comments, suggestions, or feedback regarding the section on revising the GMOs definition?*

10.Draft Terms of Reference for the PCI Working Group

42. Do you have any general comments or feedback regarding the Draft Terms of Reference for the PCI Working Group, which is planned for release by mid-October?

C. Thank you and Next Steps

On behalf of the FSC Forest Management programme, thank you very much for providing your feedback in this consultation!

As a reminder, it is possible to make changes in your responses while the consultation is open (until 30 November 2025). Even if you have submitted your responses, you can return and edit them.

Stay informed at the PCI Hub at pci.fsc.org, and for further information about this revision process, please visit the Secretariat's [current process webpage](#) on the FSC website. You are also invited to join the Secretariat's upcoming webinars:

- Overview of FSC Forest Management Standards Consultations, on Tuesday, October 14, 2025, with two sessions available.
Morning: 09:00–10:30 CEST - [Register here](#).
Afternoon: 16:00–17:30 CEST - [Register here](#), - with simultaneous translation to French and Spanish.
- PCI Consultation webinar on Thursday, 20 November, with two sessions available.
Morning: 09:00–10:30 CEST - [Register here](#)
Afternoon: 16:00–17:30 CEST - [Register here](#) with simultaneous translation to French and Spanish.

Finally, for any questions or feedback please don't hesitate to reach out at forestmanagement@fsc.org.

D. Final Questions

Stakeholder interest

The following questions are optional and will be used to inform FSC's future consultations and related material:

1. Where did you hear about this consultation? (Select one or more)

- FSC Members Portal
- Email from Consultation Platform
- FSC News & Views
- FSC International Website
- FSC Network Partner Website
- Colleague / Word of Mouth
- Social Media

Other (please specify)

2. Which of the following materials or events did you review or attend before submitting your input? (Select all that apply)

- PCI Hub
- Green Papers
- Pre-consultation Webinars
- Consultation Webinars
- General Assembly events
- FSC members survey and FSC Survey results
- Related news articles
- Normative documents under revision
- Dedicated event or Webinar
- None

Other (please specify)

3. How would you rate the usefulness of the preparation material(s)? (1 = Not useful at all / 5 = Very useful)

- PCI Hub: ①②③④⑤
- Green Papers: ①②③④⑤
- Pre-consultation Webinars: ①②③④⑤
- Consultation Webinars: ①②③④⑤
- General Assembly events: ①②③④⑤
- FSC members survey and FSC Survey results: ①②③④⑤
- Related news articles: ①②③④⑤
- Normative documents under revision: ①②③④⑤
- Dedicated event or Webinar: ①②③④⑤
- Other: _____ ①②③④⑤

4. What additional information or formats would support your participation in future consultations? (E.g., more visuals, translations, early summary, additional webinars)

5. Did you find this consultation relevant to your work or interest?

- Yes

- Somewhat
- No

6. Any additional comments?



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