

CONCEPTUAL PHASE CONSULTATION REPORT

FSC-PRO-60-006 The Development and Revision of FSC
Country Requirements and FSC-PRO-60-006a Structure
and Content of FSS

4/09/2023



FSC

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INTRODUCTION

The conceptual phase consultation on the revision of <FSC-PRO-60-006 The Development And Revision of FSC Country Requirements> and <FSC-PRO-60-006a Structure and Content of Forest Stewardship Standards> was carried out between 15 June and 15 July 2023. The consultation material contained 13 key changes proposed to be included in the procedures under revision. This information was uploaded in the FSC Consultation Platform. In parallel, four targeted webinars were organized: two for FSC members and two for FSC staff, FSC Network Partners and experts involved in the development and revision of Forest Stewardship Standards (FSS) and FSC Risk Assessments (RA).

Stakeholders were informed about the conceptual phase consultation through various communication channels, such as FSC Member's Portal, OneFSC, mailing lists for CBs, among others.



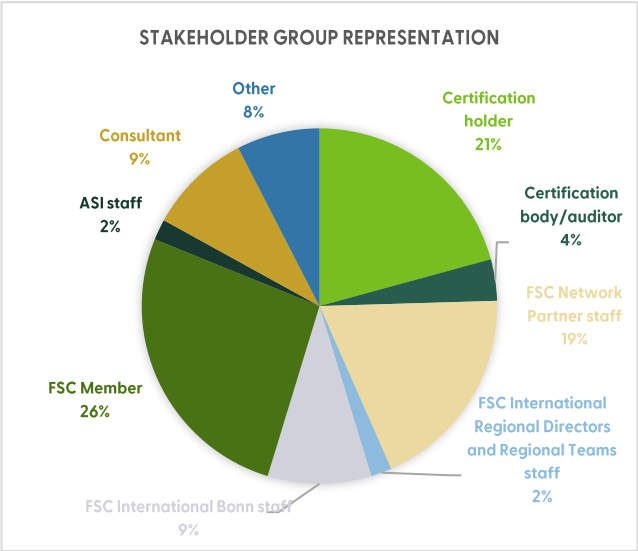
This report provides a summary of the stakeholder comments received for each of the key changes, and information on how these comments have been addressed in the draft FSC-PRO-60-006 and FSC-PRO-60-006a.

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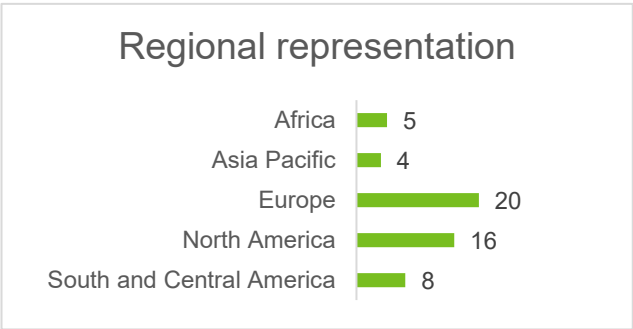
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STAKEHOLDERS' PARTICIPATION IN THE CONCEPTUAL PHASE CONSULTATION

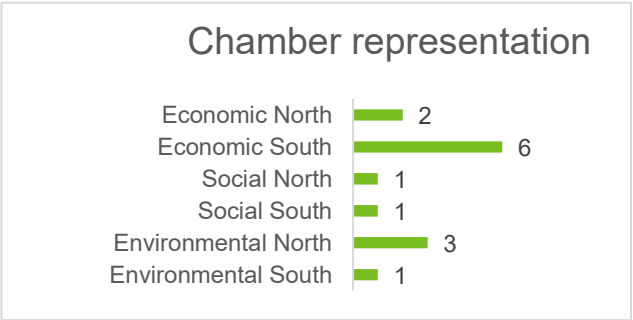
53 stakeholders provided feedback in the conceptual phase consultation.



Most of respondents belong to “FSC staff” 30% (16), “FSC Member” 26% (14), “certificate holder” 21% (11).



Most of the participants come from Europe (38%), followed by North America (30%).



Most of the FSC members 57% (8) represented the Economic (Eco) chamber.

SUMMARY OF STAKEHOLDERS' COMMENTS AND FSC FEEDBACK

This section is organized according to the topics presented in the conceptual consultation. Each topic presents the content, the questions asked in the conceptual consultation, and the received stakeholders' responses.

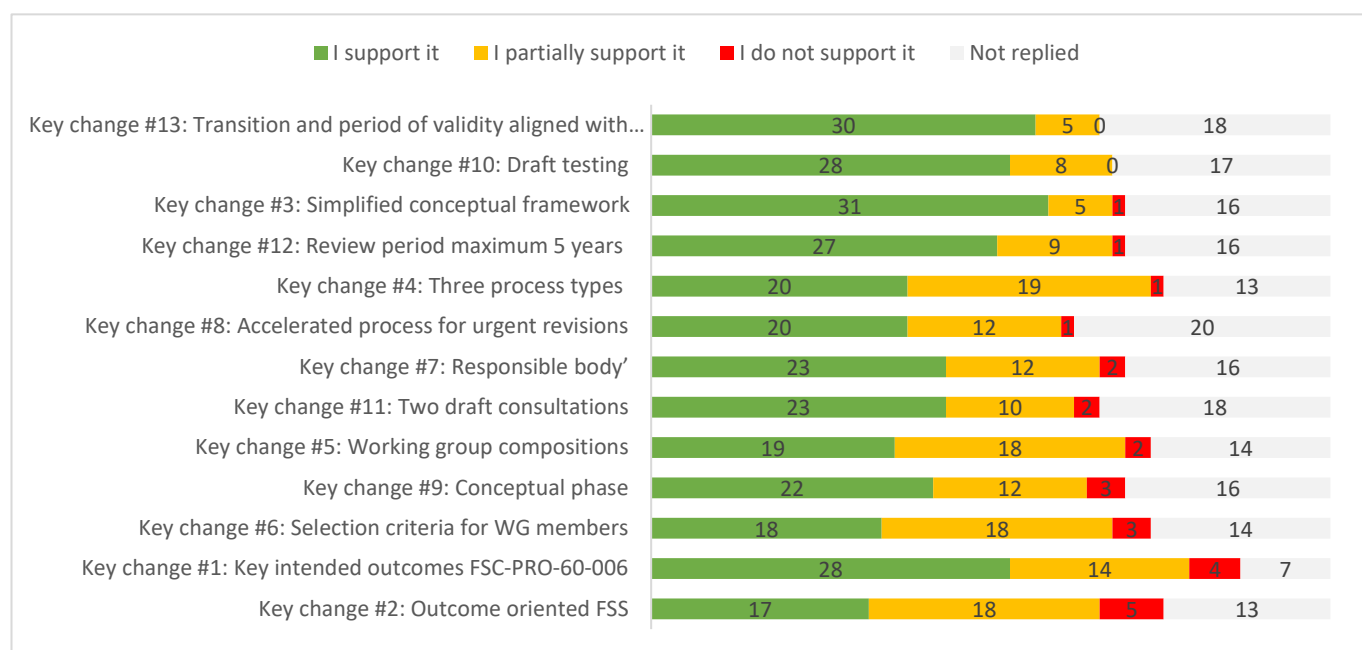
Support of the key changes

The key changes were well received by stakeholders as reflected in the table below. The figures should be considered to indicate an overall trend of agreement, keeping in mind that given the number of participants the responses cannot be seen as fully representative of FSC stakeholders and the membership.

NOTE: Click on the "[key change](#)" below to view more details on the consultation results.

Question (do you support this key change?)		Positive reception "I support"+ "I Partially support"	Negative reception "I do not support"	Total respondents
Key change 1	Key intended outcomes FSC-PRO-60-006	91%	9%	46
Key change 2	Outcome oriented FSS	88%	13%	40
Key change 3	Simplified conceptual framework	97%	3%	37
Key change 4	Three process types for developing and revising FSS and RA	98%	3%	40
Key change 5	Different working group compositions	95%	5%	39
Key change 6	Consistent selection criteria for WG members for all processes	92%	8%	39
Key change 7	Every FSS and RA will have a "responsible body"	95%	5%	37
Key change 8	Fast-track option of accelerated process for urgent revisions of FSS and RA	97%	3%	33
Key change 9	New phase to shape process	92%	8%	37
Key change 10	All drafts of the FSS and RA will be possible to test	100%	0%	36
Key change 11	The FSS and RA drafts will be subject to at least two consultations	94%	6%	35
Key change 12	FSS and RA's review period will be maximum 5 years	97%	3%	37
Key change 13	Transition and period of validity of FSS and RA aligned with FSC-PRO-01-001	100%	0%	35

Question: “Do you support this change?” (53 respondents)



Stakeholders' main suggestions to the key changes

NOTE: Click on the "[key change](#)" below to view more details on the consultation results.

Key change	Main comments from stakeholders (text in bold letters)	FSC position to main comment
<u>Key change # 1</u> Effective and efficiency of the revised procedure.	1. Share your main suggestion regarding this change: Efficiency and effectiveness needs to be defined.	Clarifications will be provided and consulted with the draft of FSC-PRO-60-006.
<u>Key change # 2</u> Outcome oriented FSS. <u>Key change # 2</u> <u>Opportunities</u>	1. What opportunities do you see for this change?: To include streamlined and outcome-oriented indicators.	The draft FSC-PRO-60-006 and FSC-PRO-60-006a include a set of requirements for outcome oriented FSS. The main elements are the following: a) The working group will define a minimum of 3 and maximum of 5 key intended outcomes for the entire FSS; b) The working group will adopt, adapt, or drop the IGI or the indicators of the previously approved FSS, or add new indicators to contribute towards each of the key intended outcomes; c) The appointed expert(s), in coordination with the working group will define monitoring requirements for each of the key intended outcomes.
<u>Key change # 2</u> <u>Challenges</u>	3. What challenges might this change bring?: The monitoring of outcome oriented FSS should not pose a heavy burden of data gathering.	There is a growing demand from stakeholders for FSC to demonstrate the impact of its normative requirements. The attributable impact of FSC can only be substantiated with credible data, therefore there is a need to collect data of sufficient quality to demonstrate the positive impacts of FSC forest management certification. FSC will aim to ensure that the monitoring of requirements is not too onerous for the stakeholders involved.
	4. What challenges might this change bring? Outcome oriented FSS should not require new data but use existing requested data.	Taking into consideration the potential burden associated with the deployment of outcome orientation, risk-based approach is now included in the draft FSC-PRO-60-006 and

Key change	Main comments from stakeholders (text in bold letters)	FSC position to main comment
		FSC-PRO-60-006a, which will allow working groups to assess the risk of non-conformance with FSS indicators. Those indicators designated as negligible risk will not be subject to evaluation.
Key change # 3 Simplified conceptual framework (no longer using “NFSS,INS,RFSS” or “NRA, CNRA” but using FSS and RA)	1. Share your main suggestion regarding this change: Note: No key comment from stakeholder is considered for this key change because of high level of acceptance (97%) (only 1 respondent not supporting it and 5 partially supporting it, out of 37 respondents).	
Key change # 4 Three process types for developing and revising FSS and FSC RA.	1. Share your main suggestion regarding this change: Define applicability criteria for process types.	Section 1 of draft FSC-PRO-60-006 specifies the characteristics of each process type as well as situations when accelerated type of process can be used for the development and revision of FSC country requirements. Furthermore, Figure 4 provides guidance on the allocation of process types.
Key change # 5 Different working group compositions.	1. Share your main suggestion regarding this change: Major process possibility to have experts.	Non-voting experts can be included in major process type at the discretion of the responsible body.
	2. Share your main suggestion regarding this change: Gender balanced should be a preference not a requirement.	Key change expressed: “The composition of the working groups should be gender balanced”. “Should” is a verbal form for the expression of provisions that indicates that among several possibilities, one is recommended as particularly suitable, without mentioning or excluding others.
Key change # 6 Consistent selection criteria for WG members for all processes.	1. Share your main suggestion regarding this change: Allow associations with FSC-competitive systems.	The draft of FSC-PRO-60-006 includes a provision to exclude staff or members of decision-making bodies of FSC-competitive systems from becoming member of a working group (Clause 2.14). Other individuals with some relationship to FSC-competitive systems are not

Key change	Main comments from stakeholders (text in bold letters)	FSC position to main comment
		excluded from becoming a member of a working group.
	2. Share your main suggestion regarding this change: Transparent and objective evaluation criteria of candidates.	The requirements for selection of the working group members have been modified to reflect stakeholder's feedback, as specified in the draft of FSC-PRO-60-006 released for consultation (Clauses 2.10, 2.11 and 2.12). If the FSC National Board of Directors meets the criteria, they can form a chamber-balanced working group to develop or revise FSC country requirements.
<u>Key change # 7</u> Every FSS and RA will have a "responsible body".	1. Share your main suggestion regarding this change: Support to the responsible body with local experts.	It will be possible for responsible bodies to engage local non-voting experts. See Clauses 2.18 to 2.22 of draft FSC-PRO-60-006 for the requirements for involving experts during the development and revision of FSC country requirements.
<u>Key change # 8</u> Fast-track option of accelerated process for urgent revisions of FSS and RA.	1. Share your main suggestion regarding this change: Define eligibility criteria for "urgent" and "administrative" accelerated processes.	Clause 1.1 of the draft FSC-PRO-60-006 specifies the characteristics of urgent and administrative accelerated processes. And for the "urgent" accelerated processes, it clarifies that these are processes to preserve the integrity and credibility of the FSC system. Note 1 under this clause provides examples on situations when accelerated process may be applied: to adopt or adapt a new or revised IGI in an approved FSS, or as a result of an annual review of a RA.
<u>Key change # 9</u> Conceptual phase: New phase to shape process.	1. Share your main suggestion regarding this change: Require mandatory conceptual consultation.	Section 5 of draft FSC-PRO-60-006 specifies that conceptual phase public consultation is mandatory for major process. In the case of regular process is optional, and for accelerated process is not applicable.
<u>Key change # 10</u>	1. Share your main suggestion regarding this change:	

Key change	Main comments from stakeholders (text in bold letters)	FSC position to main comment
All drafts of the FSS and RA will be possible to test.	Note: No key comment from stakeholder is considered for this key change because of high level of acceptance (only 8 partially supporting it and no one opposing to it).	
<u>Key change # 10</u> <u>Revision Major</u>	2. Which option A or B, do you find more suitable for revisions under major processes in b)?: Mandatory testing for revisions under major processes.	The Clause 7.5 of draft FSC-PRO-60-006 specifies requirement for mandatory testing of the draft for all major processes. In the case of regular is optional, and for accelerated to be determined on a case-by-cases basis. Regarding the type of testing to be used, it can be field or desk testing.
<u>Key change # 11</u> The FSS and RA will be subject to at least two consultations.	1. Share your main suggestion regarding this change: Flexibility in consultations.	The draft of FSC-PRO-60-006 includes a requirement for responsible body to plan consultations for each process type (e.g., rounds, duration, scope and outreach) in agreement with FSC during the registration of the process.
	2. Share your main suggestion regarding this change: No consultation for administrative accelerated processes.	In order to ensure alignment among our requirements, a focused consultation will be required for all accelerated processes.
<u>Key change #11</u> <u>consideration</u> <u>consultation types.</u>	3. Should the consultations (conceptual and draft) in a process be counted equally, as in FSC-PRO-01-001?: Consultations (conceptual and draft) should be equally counted, as in FSC-PRO-01-001.	The draft of FSC-PRO-60-006 requires two consultations in the case of major process, one at the conceptual phase and one during drafting. In the case of regular accelerated, one is always required during drafting phase.
<u>Key change # 12</u> FSS and RA's review period will be maximum 5 years.	1. Share your main suggestion regarding this change: Note: no key comment from stakeholder is considered for this key change because of high level of acceptance (only 9 partially supporting it and one opposing to it).	It is important to highlight that the draft FSC-PRO-60-006 now specifies that the responsible body will conduct the review of FSC country requirements within five years from the transition end date of the FSC country requirements. In addition, the responsible body should start the review of FSC country requirements latest by the 4 th year from the

Key change	Main comments from stakeholders (text in bold letters)	FSC position to main comment
		transition end date of the FSC country requirements.
<u>Key change # 13</u> Transition and period of validity of FSS and RA aligned with FSC-PRO-01-001.	1. Share your main suggestion regarding this change: Note: no key comment from stakeholder is considered for this key change because of high level of acceptance (only 5 partially supporting it and no one opposing to it).	
<u>Key change # 13 effective dates.</u>	2. Should the effective dates be aligned with international procedure FSC-PRO-01-001 which will be 1st January and 1st July of every year?: Effective dates of FSS and RA should be aligned with those effective dates in FSC-PRO-01-001.	Requiring generic effective dates for the versions of the FSS and RA is not appropriate given the local scope of application. Local conditions determine the time needed for certificate holders and certification bodies to prepare for the implementation of new country requirements for certification. Having common effective dates for the versions of FSS and RA will streamline the implementation phases of these versions, but it will be a major challenge also for responsible bodies, process leads, working groups and FSC.

ANNEX: STAKEHOLDERS' COMMENTS AND FSC FEEDBACK

Key change # 1 Increase efficiency and effectiveness for the development and revision of FSC country requirements

a) Do you support this change?

Level of acceptance= 91%, 42/46 replies

Stakeholder group(s) expected to be directly impacted by key change are highlighted.

Q1.1.	1.1. Do you support this change?																					
	Region					Type org cleaned										Chamber asked						
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other	Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
Responses																						
I support it	3	3	9	5	8	6	2	5	1	2	7	1	2	2	3	0	1	2	0	1	13	8
I partially support it	1	0	5	1	7	3	0	4	0	2	3	0	2	0	0	0	1	1	0	5	6	
I do not support it	0	0	2	2	0	0	0	1	0	0	3	0	0	0	0	0	0	0	0	1	0	
Total	4	3	16	8	15	9	2	10	1	4	13	1	4	2	5	2	1	3	1	1	19	14
Agreement + Partial	100%	100%	88%	75%	100%	100%	100%	90%	100%	100%	77%	100%	100%	100%	60%	50%	100%	100%	100%	100%	95%	100%
Total disagreement	0%	0%	13%	25%	0%	0%	0%	10%	0%	0%	23%	0%	0%	0%	40%	50%	0%	0%	0%	0%	5%	0%

b) Share your main suggestion regarding this change.

Nr	Key Stakeholder Feedback	FSC's comment
1	Efficiency and effectiveness needs to be defined. Main proposers: Region: EU(1), NA(5). Chamber: Eco N (1), Env N (1). Stakeholder group: CH(2), Member (2), FSC (1), Consultant (1). More details: "It needs to be made more clear what efficiency and effectiveness means in this context. Right now some would view making things more efficient in conflict with making things more effective."	Clarifications will be provided and consulted with the draft of FSC-PRO-60-006.

“To me it is unclear what effectiveness means. I hope it means having meaningful, risk-based and outcome-oriented requirements that allow for country context while maintaining global consistency.”

“increase” intention works better for the revision process but not for the intended outcomes of the procedure and FSS content addenda, which should relate to what kind of processes and content in FSS we want to have as result of following these requirements. “Engaging, effective, efficient, reliable processes” and “FSS and RA with content that is relevant, understandable, complete, simple, user-friendly and consistent with other applicable FSC requirements”.

Key change # 2 Outcome oriented FSS

The Forest Stewardship Standards (FSS) will include a set of short-listed key intended outcomes for responsible forest stewardship. The FSS will also include associated progress indicators and definition of data to be collected to measure progress towards, or achievement of, the key intended outcomes. The data collected will be analysed as part of FSC’s monitoring and evaluation activities to support learning about the effects of FSC forest management certification.

The main reason for having outcome oriented FSS is to gather systemic evidence of the prioritized impacts of FSC forest management certification, and to enable participants of the FSC certification to use this evidence in improving sustainability practices and communication.

a) Do you support this change?

Level of acceptance= 88%, 35/40 replies

Stakeholder group(s) expected to be directly impacted by key change are highlighted.

Q2.1. Responses	2.1. Do you support this change?																			
	Region					Type org cleaned										Chamber asked				
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other	Eco S	Eco N	Env S	Env N	Soc S	Soc N
I support it	1	2	8	2	4	2	1	3	1	2	4	1	1	2	0	2	0	1	0	1
I partially support it	1	2	4	4	7	5	1	4	0	2	5	0	1	0	3	0	0	2	0	0
I do not support it	0	0	1	1	3	1	0	2	0	0	1	0	1	0	1	0	0	0	0	0
Total	2	4	13	7	14	8	2	9	1	4	10	1	3	2	4	2	0	3	0	1
Agreement + Partial	100%	100%	92%	86%	79%	88%	100%	78%	100%	100%	90%	100%	67%	100%	75%	100%	100%	100%	100%	94%
Total disagreement	0%	0%	8%	14%	21%	13%	0%	22%	0%	0%	10%	0%	33%	0%	25%	0%	0%	0%	0%	6%

b) What opportunities do you see for this change?

Nr	Key Stakeholder Feedback	FSC's comment
1	To include streamlined and outcome-oriented indicators. Main proposers: Region: EU(1), AF(1), NA(2). Chamber: 0 Stakeholder group: CH (1), FSC (2), Other (1). More details: "Outcome based standards could reduce the regional differences and result in a more uniform national standard." "...an opportunity for FSS to include streamlined and outcome-oriented sets of indicators for particular sub-categories of CH or particular homogenous spatial areas/landscapes within the scope of the FSS." "It may be of value to have the same list of outcomes in all countries..."	The draft FSC-PRO-60-006 and FSC-PRO-60-006a include a set of requirements for outcome oriented FSS. The main elements are the following: d) The working group will define a minimum of 3 and maximum of 5 key intended outcomes for the entire FSS; e) The working group will adopt, adapt, or drop the IGI or the indicators of the previously approved FSS, or add new indicators to contribute towards each of the key intended outcomes; f) The appointed expert(s), in coordination with the working group will define monitoring requirements for each of the key intended outcomes, which include the following: - o expected insights; - o monitoring indicators; - o metrics for monitoring indicators; - o data collection methods; - o sampling; - o additional data needs and - o data reporting.
2	To reduce the number of requirements. Main proposers: Region: EU(2), S&CA(1), NA(1). Chamber: Eco N (1). Stakeholder group: CH (2), Member (1). More details: "That's fine if the FSS also reduce the number of prescriptive requirements. You can't have both fully engaged or you will lose even more certificate holders and reduce your impact. If the idea is to focus MORE on those prescriptive outcomes AND LESS on prescriptive standards then I fully support..."	

Opportunities mentioned by SH that did not support the proposed change:

FSC NP (1): opportunity to prioritize positive impacts for forests (i.e., achieving our mission statement) not just FSC's impacts (to better promote the brand).

c) What challenges might this change bring?

Nr	Key Stakeholder Feedback	FSC's comment
1	The monitoring of outcome oriented FSS should not pose a heavy burden of data gathering. Main proposers: Region: AP (2), S&CA (3), EU(5), AF(1), NA (5). Chamber: Eco S (2). Stakeholder group: CH (6), FSC (7), Member (2), Consultant (1). More details: "The main challenge will be to avoid adding more complexity or costs to certificate holders." "not to focus on creating new obligations, especially when these entail additional complexity and costs." "There is an urgent need to reduce the operational burden and cost to certificate holders. Additional requirements for reporting are not advisable."	There is a growing demand from stakeholders for FSC to demonstrate the impact of its normative requirements. The attributable impact of FSC can only be substantiated with credible data, therefore there is a need to collect data of sufficient quality to demonstrate the positive impacts of FSC forest management certification. FSC will aim to ensure that the monitoring of requirements is not too onerous for the stakeholders involved. Taking into consideration the potential burden associated with the deployment of outcome orientation, risk-based approach is now included in the draft FSC-PRO-60-006 and FSC-PRO-60-006a, which will allow working groups to assess the risk of non-conformance with FSS indicators. Those indicators designated as negligible risk will not be subject to evaluation. Section 4 of FSC-PRO-60-006a includes the requirements for streamlining FSS towards outcomes, covering both outcome orientation and risk-based approach.
2	Outcome oriented FSS should not require new data but use existing requested data. Main proposers: Region: EU(3), S&CA(4), NA (1). Chamber: Eco S(3). Stakeholder group: CH (2), FSC (3), Member (3). More details: "...consider improvements in the recording of compliance assessments based on the data already collected by certificate holders..." "A lot of data is already gathered through the Audit online report, aligned with STD-20-007. 1)..." "We must focus on the information that is already addressed under Principle 8, and transform it into data that we can be used as a way to prove impacts and benefits of FSC certification."	

Challenges mentioned by SH that did not support the proposed change:

FSC NP (1) : not having important local-level outcomes, loss of CH (because the value gained from FSC certification no longer justifies the growing costs for reporting requirements), heavy burden of data gathering, and not demonstrating positive impact for CHs (just for FSC).

CH(1): "additional costs and burden on certificate holders when FSC needs to be focusing on increasing value to certificate holders in the marketplace".

Key change # 3 Simplified conceptual framework

Country requirements will be referred to in a simpler way.

National Forest Stewardship Standards (NFSS), Interim Forest Stewardship Standards (IFSS) and Regional Forest Stewardship Standards (RFSS) **will all be called Forest Stewardship Standards (FSS)**.

Centralized National Risk Assessments (CNRA) and National Risk Assessments (NRA) will both be called **FSC Risk Assessments (RA)**.

a) Do you support this change?

Level of acceptance= 97%, 36/37 replies

Stakeholder group expected to be directly impacted by key change is highlighted.

Responses	3.1. Do you support this change?																				
	Region					Type org cleaned										Chamber asked					
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other		Eco S	Eco N	Env S	Env N	Soc S	Soc N
I support it	2	4	10	5	10	5	2	6	1	4	8	1	1	3		3	1	0	2	1	1
I partially support it	0	0	2	1	2	0	0	2	0	0	2	0	1	0		1	0	0	1	0	0
I do not support it	1	0	0	0	0	1	0	0	0	0	0	0	0	0		0	0	0	0	0	0
Total	3	4	12	6	12	6	2	8	1	4	10	1	2	3		4	1	0	3	1	1
Agreement + Partial	67%	100%	100%	100%	100%	83%	100%	100%	100%	100%	100%	100%	100%	100%		100%	100%	100%	100%	100%	91%
Total disagreement	33%	0%	0%	0%	0%	17%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%	0%	0%	0%	9%

Suggestions mentioned by SH that did not support the proposed change:

CH (1): "The abbreviations indicated the level of adaptation and involvement by local stakeholders, this is now lost".

NOTE: No key comment from stakeholder is considered for this key change because of high level of acceptance (only 95% partially supporting it and one opposing to it).

Key change #4 Three process types for developing and revising FSS and RA

In alignment with the new FSC-PRO-01-001 (Procedure for development and revision of FSC requirements), we propose three distinct pathways for developing or revising the FSC country requirements, the Forest Stewardship Standards (FSS) and FSC Risk Assessments (RA): major, regular and accelerated.

a) Do you support this change?

Level of acceptance= 98%, 39/40 replies

Stakeholder group expected to be directly impacted by key change is highlighted.

Q4.1. Responses	4.1. Do you support this change?														Chamber asked							
	Region					Type org cleaned																
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other	Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
I support it	1	2	9	2	6	3	1	2	0	4	6	1	1	2	2	1	0	2	0	1	8	6
I partially support it	2	1	4	4	8	4	1	6	1	0	5	0	1	1	3	1	0	1	0	0	8	6
I do not support it	0	1	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1
Total	3	4	13	6	14	8	2	8	1	4	11	1	2	3	5	2	0	3	0	1	16	13
Agreement + Partial	100%	75%	100%	100%	100%	88%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	92%	
Total disagreement	0%	25%	0%	0%	0%	13%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	8%	

b) Share your main suggestion regarding this change.

Nr	Key Stakeholder Feedback	FSC's comment
1	Define applicability criteria for process types. Main proposers: Region: AP (1), EU(1), NA(1). Chamber: (0) Stakeholder group: NP (3)*. More details: "It is not clear how a responsible body will decide between major and regular – what are the criteria for deciding?"	Section 1 of draft FSC-PRO-60-006 specifies the characteristics of each process type as well as situations when accelerated type of process can be used for the development and revision of FSC country requirements. Furthermore, Figure 4 provides

“Concerns regarding the use of the regular and accelerated processes. Since the new PRO-01-001 became effective, it seems that there have been few public consultations, etc. and there are potential risks to our credibility if the regular/accelerated processes are misused.”

“As I read it, scheduled revisions (i.e. regular processes) can occur as major OR regular processes. It's not clear to me what would decide which category it would end up in.”

guidance on the allocation of process types.

Key change # 5 Different working group compositions

The working groups consist of individuals with relevant knowledge and professional experience in the field of question, established to input the development or revision of a FSS or RA. The composition of the working groups should be gender balanced.

Major process: Chamber-balanced working group, representing the three chambers of social, environmental and economic interests with equal weight.

Regular process: The working group ideally composed of experts in social, environmental or economic aspects and at least one member from an FSC-accredited certification body that conducts or intends to conduct assessments in the same geographical area as the scope of the FSS or RA. When a chamber balanced working group cannot be registered, a regular process will be registered instead.

Accelerated process: Do not need a working group, the responsible body for that process will conduct the urgent or administrative revision.

a) Do you support this change?

Level of acceptance= 95%, 37/39 replies

Stakeholder group expected to be directly impacted by key change is highlighted.

Q5.1.	5.1. Do you support this change?																					
	Region					Type org cleaned										Chamber asked						
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other	Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
Responses																						
I support it	2	1	8	2	6	3	2	2	0	2	7	1	1	1	1	2	0	2	1	1	7	5
I partially support it	1	2	4	4	7	3	0	6	0	1	5	0	1	2	4	0	0	1	0	0	7	6
I do not support it	1	1	0	0	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2
Total	4	4	12	6	13	7	2	8	1	3	12	1	2	3	5	2	0	3	1	1	14	13
Agreement + Partial	75%	75%	100%	100%	100%	86%	100%	100%	0%	100%	100%	100%	100%	100%	100%	100%		100%	100%	100%	100%	85%
Total disagreement	25%	25%	0%	0%	0%	14%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%		0%	0%	0%	0%	15%

b) **Share your main suggestion regarding this change.**

Nr	Key Stakeholder Feedback	FSC's comment
1	Major process possibility to have experts. Main proposers: Region: S&CA (3), NA(1). Chamber: Eco S (3), Eco Env N (1). Stakeholder group: Members (4). More details: “Auditor/CB involved could also be valuable, even if they only participate as advisors to the WG.” “Possibility for experts to be present..., in addition to the balance of chambers, as the WG sees necessary.”	Non-voting experts can be included in major process type at the discretion of the responsible body.
2	Gender balanced should be a preference not a requirement. Main proposers: Region: AP (1), EU (1) Chamber: (0) Stakeholder group: FSC (2) More details: “We are of course in favor of equality and equity but for the WG we need to understand that this can be an additional issue. We can refer that is a preference but not mandatory, because if we do not achieve it is the standard that is putting into question...” “item b), how to define the gender balanced? what if can't find the proper person of specific gender? what about change to : b) the composition of working groups should consider the gender balanced.”	Key change expressed: “The composition of the working groups should be gender balanced”. “Should” is a verbal form for the expression of provisions that indicates that among several possibilities, one is recommended as particularly suitable, without mentioning or excluding others..

Additional suggestions from SH that did not supported the proposed change:

CH (1): “What does gender balance mean? There is a risk the most relevant people will be excluded if gender balance is required across a group or within a chamber. What is an expert? This needs to be defined and seems to take away a stakeholder who may not qualify as an expert. Do not support an accelerated process - seems like a means for FSC to supersede local or national adaptation.”

Additional suggestions from FSC NP that partially supported the proposed change:

No chamber balanced working group for RA, composition to include one indigenous people representative.

Key change # 6 Consistent selection criteria for WG members for all processes

The responsible body will use a predefined criteria for the selection of process Lead and working group (WG) members.

- **Technical skills**
 - i. Understanding of and support for FSC's mission and vision.
 - ii. Expertise in forest management and forestry sector of the geographic area under consideration for local adaptation of FSC requirements.
- **Soft skills**
 - Teamwork, clarity of expression, culturally appropriate behaviour, critical thinking, and consensus building.
- **Engagement**
 - Engaging constituency, active participation.
- **Contribution**
 - Solution and result orientation while respecting the process timelines.

Where available, the responsible body will consider past performance of applicants in the evaluation of candidates.

In the case of major processes, the members of the chamber-balanced working groups will have the ability to represent the views of the corresponding chamber, including the views of small, medium and large enterprises affected by the requirements.

The responsible body, the process lead and the members of the working group will act in the development process **without any conflict of interest and without posing any reputational risk to FSC.**

NOTE: This means that the responsible body, the process lead and the members of working group will not be, for example: (1) members of FSC decision making bodies (e.g., members of the Policy and Standards Committee (PSC) or the FSC Board of Directors members (BoD) or of any secretariat or committees), (2) representatives of FSC-disassociated companies, or (3) some entity or individual that has a legal relationship with any of the FSC-competitive systems or is a member of related committees, working groups, boards, or similar bodies.

FSC staff will not participate as members of a working group.

a) Do you support this change?

Level of acceptance= 92%, 36/39 replies

Stakeholder group expected to be directly impacted by key change is highlighted.

Q6.1.	6.1. Do you support this change?																					
	Region					Type org. cleaned										Chamber asked						
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other	Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
Responses																						
I support it	2	3	6	2	5	3	1	5	0	3	3	1	1	1	2	0	0	0	1	10	5	
I partially support it	0	1	6	4	7	3	1	2	0	1	8	0	1	2	3	2	0	3	0	0	4	6
I do not support it	1	0	1	0	1	1	0	1	1	0	0	0	0	0	0	0	0	0	0	1	2	
Total	3	4	13	6	13	7	2	8	1	4	11	1	2	3	5	2	0	3	0	1	15	13
Agreement + Partial	67%	100%	92%	100%	92%	86%	100%	88%	0%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	93%	85%	
Total disagreement	33%	0%	8%	0%	8%	14%	0%	13%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	7%	15%	

b) Share your main suggestion regarding this change.

Nr	Key Stakeholder Feedback	FSC's comment
1	Allow associations with FSC-competitive systems. Main proposers: Region: AP (1), S&CA (3), EU (3), NA(2). Chamber: Eco N (1), Eco S (3), Env N (1), N/A (3). Stakeholder group: CH (2), FSC (3), Member (4). More details: "I fully agree with restricting the participation of people who are involved in the governance of systems competitive to FSC. However, restricting those who are part of committees or working groups of other systems is something that may hinder the formation of FSC teams to conduct the standards development/revision processes." "...not plausible to limit the participation of people who are part of technical groups. When the contribution is specifically technical, it should not be a problem for the participant to contribute to more than one certification system..."	The draft of FSC-PRO-60-006 includes a provision to exclude staff or members of decision-making bodies of FSC-competitive systems from becoming member of a working group (Clause 2.14). Other individuals with some relationship to FSC-competitive systems are not excluded from becoming a member of a working group.
2	Transparent and objective evaluation criteria of candidates. Main proposers: Region: AP (2), S&CA (1), NA(1). Chamber: 0 Stakeholder group: CH (3), FSC (1).	The selection of the working group members has been modified to reflect stakeholder's feedback, as specified in the draft of FSC-PRO-60-006 released for consultation (Clauses 2.10, 2.11 and 2.12). If the

More details:

"It is important to include more specific criteria for selection to avoid a broad interpretation and questioning of the selection process." "...it should be clarified at what point in the process FSC determines if these criteria are met." "Not to allow National BoD members to become WG members" "Allow National BoD members to become WG members" "Ensure effective chamber representation in chamber-balanced WGs"

FSC National Board of Directors meets the criteria, they can form a chamber-balanced working group to develop or revise FSC country requirements.

Key change # 7 Every FSS and RA will have a "responsible body"

Each development and revision process registration will **formally establish a responsible body**.

This body will be **responsible for all phases a process** undergoes, from registration **till its withdrawal**.

Network Partners and Regional Teams will be eligible to become responsible bodies of FSS and RA versions.

P&P would only take over in the absence of these two bodies.

For development and revision processes with chamber-balanced working group, the roles of "SDG Chair" and "SDG Coordinator" will be replaced by the role of "**Process Lead**".

a) Do you support this change?

Level of acceptance= 95%, 35/37 replies

Stakeholder group expected to be directly impacted by key change is highlighted.

Q7.1.	7.1. Do you support this change?																					
	Region					Type org. cleaned										Chamber asked						
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other	Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
Responses																						
I support it	2	3	8	3	7	4	2	5	0	4	6	0	1	1	2	1	0	2	0	1	10	7
I partially support it	1	1	3	2	5	2	0	3	1	0	3	1	1	1	2	0	0	1	0	0	5	4
I do not support it	0	0	1	0	1	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	2
Total	3	4	12	5	13	7	2	8	1	4	9	1	2	3	4	1	0	3	0	1	15	13
Agreement + Partial	100%	100%	92%	100%	92%	86%	100%	100%	100%	100%	100%	100%	100%	67%	100%	100%		100%		100%	100%	85%
Total disagreement	0%	0%	8%	0%	8%	14%	0%	0%	0%	0%	0%	0%	0%	33%	0%	0%		0%		0%	0%	15%

b) **Share your main suggestion regarding this change.**

Nr	Key Stakeholder Feedback	FSC's comment
1	Support to the responsible body with local experts. Main proposers: Region: AF (1), S&CA (2). Chamber: Eco S (3). Stakeholder group: Member (3). More details: “...to execute accelerated processes, it is essential that it [<i>the responsible body</i>] has in its composition experts who have local knowledge...whether it is made up of people from Network Partners or Regional Teams. In cases where the PSU has to take over, it is important that it has support from a local expert.” “We need forest managers (organizational bodies) to be a part of the responsible body. They are our key market.”	It will be possible for responsible bodies to engage local non-voting experts. See Clauses 2.18 to 2.22 of draft FSC-PRO-60-006 for the requirements for involving experts during the development and revision of FSC country requirements.

Key change # 8 Fast-track option of accelerated process for urgent revisions of FSS and RA

Urgent revisions of Forest Stewardship Standards (FSS) and Risk Assessments (RA) versions will only be possible under accelerated processes. Accelerated process type will be used **to preserve and strengthen the integrity and credibility of the FSC system**. This process type will also apply to **administrative revisions** that do not involve changes to the requirements.

The accelerated processes will be a fast-track option with fewer process steps than the major or regular processes. Key features:

- i. Voluntary participation of the process lead and working group. The responsible body will lead the process including the drafting.
- ii. Conceptual consultation will be optional.
- iii. Draft consultation will be required only when the requirements change.
- iv. Testing (desk or field) will be optional.
- v. Revised versions will become effective upon publication only when the requirements do not change.
- vi. Transition end date to be defined case by case.

a) Do you support this change?

Level of acceptance= 97%, 32/33 replies

Stakeholder group expected to be directly impacted by key change is highlighted.

Q8.1. Responses	8.1. Do you support this change?															Chamber asked							
	Region					Type org cleaned																	
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other		Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
I support it	3	2	7	2	6	3	1	3	1	3	5	1	1	2		2	1	0	1	0	1	8	7
I partially support it	0	1	2	3	6	3	0	3	0	1	4	0	1	0		2	0	0	2	0	0	4	4
I do not support it	0	1	0	0	0	1	0	0	0	0	0	0	0	0		0	0	0	0	0	0	0	1
Total	3	4	9	5	12	7	1	6	1	4	9	1	2	2		4	1	0	3	0	1	12	12
Agreement + Partial	100%	75%	100%	100%	100%	86%	100%	100%	100%	100%	100%	100%	100%	100%		100%	100%		100%		100%	100%	92%
Total disagreement	0%	25%	0%	0%	0%	14%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%		0%		0%	0%	8%

b) Share your main suggestion regarding this change.

Nr	Key Stakeholder Feedback	FSC's comment
1	Define eligibility criteria for “urgent” and “administrative” accelerated processes. Main proposers: Region: EU (1), S&CA (2), NA (4). Chamber: Eco S (2), Env N (1). Stakeholder group: FSC (2), Member (3), CH (2). More details: “It is important that the FSC establishes criteria to define which situations are urgent...” “it is critically important to also have well defined criteria for deciding when this approach is appropriate.” “important to provide some clear parameters on what qualifies as urgent or administrative, so the pathway is not abused...”	Clause 1.1 of the draft FSC-PRO-60-006 specifies the characteristics of urgent and administrative accelerated processes. And for the “urgent” accelerated processes, it clarifies that these are processes to preserve the integrity and credibility of the FSC system. Note 1 under this clause provides examples on situations when accelerated process may be applied: to adopt or adapt a new or revised IGI in an approved Forest Stewardship Standard (FSS), or as a result of an annual review of a Risk Assessment (RA).

Key change # 9 New phase to shape process

There will be a **new and mandatory phase** for shaping the content objectives of the development or revision process **post-registration**: conceptual phase.

During this phase, there will be an opportunity to engage with local stakeholders via an optional conceptual consultation.

This phase will be carried out by the **responsible body** registered for that process.

a) Do you support this change?

Level of acceptance= 92%, 34/37 replies

Stakeholder group expected to be directly impacted by key change is highlighted.

Q9.1.	9.1. Do you support this change?																					
	Region					Type org. cleaned										Chamber asked						
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other	Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
Responses																						
I support it	3	2	9	2	6	4	1	3	1	4	5	1	1	2	2	1	0	2	0	0	10	7
I partially support it	0	2	2	3	5	2	0	4	0	0	4	0	1	1	2	0	0	1	0	1	3	5
I do not support it	0	0	1	0	2	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2	1
Total	3	4	12	5	13	7	2	8	1	4	9	1	2	3	4	1	0	3	0	1	15	13
Agreement + Partial	100%	100%	92%	100%	85%	86%	50%	88%	100%	100%	100%	100%	100%	100%	100%	100%		100%		100%	87%	92%
Total disagreement	0%	0%	8%	0%	15%	14%	50%	13%	0%	0%	0%	0%	0%	0%	0%	0%		0%		0%	13%	8%

b) Share your main suggestion regarding this change.

Nr	Key Stakeholder Feedback	FSC's comment
1	Require mandatory conceptual consultation. Main proposers: Region: S&CA (2), EU (1), NA (1). Chamber: Eco S (2). Stakeholder group: CB (1), FSC (1), Member (2).	Section 5 of draft FSC-PRO-60-006 specifies that conceptual phase public consultation is mandatory for major process. In the case of regular process is optional, and for accelerated process is not applicable.

More details:

“Engagement with local stakeholders should be mandatory. Their expertise and understanding is important and key to FSC and goes beyond that of any working group.” “The common development/revision of the FSS and RA ...where consultation of the conceptual phase is mandatory and public.” “Undertake conceptual phase before process approval” “conceptual phase mandatory only for major process”

Additional suggestions from SH that partially supported the proposed change:

FSC NP: Guidance on how to consult during conceptual phase and define involvement of process lead and WG in conceptual phase.

Key change # 10 All drafts of the FSS and RA will be possible to test

Field testing will be a **requirement for major processes** that develop the **initial versions** of the FSS and RA.

a) Do you support this change?

Level of acceptance = 100%, 36/36 replies

Stakeholder group expected to be directly impacted by key change is highlighted.

Q10.2.	10.2. Do you support this change?																					
	Region					Type org. cleaned										Chamber asked						
Responses	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other	Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
	4	3	8	5	8	6	1	5	1	3	8	1	1	2	4	1	1	2	0	0	11	9
	0	1	2	0	5	1	1	3	0	0	2	0	1	0	0	0	0	1	0	1	4	2
	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Total	4	4	10	5	13	7	2	8	1	3	10	1	2	2	4	1	1	3	0	1	15
Agreement + Partial	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%		100%	100%	100%
Total disagreement	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%	0%

NOTE: No key comment from stakeholder is considered for this key change because of high level of acceptance (only 8 partially supporting it and no one opposing to it).

b) Which option A (mandatory testing) or B (optional testing), do you find more suitable for revisions under major processes?

(Option A: 64%, 23/36 votes)

(Option B: 36%, 13/36 votes)

Stakeholder group expected to be directly impacted by key change is highlighted.

Responses	Region					Type org. cleaned										Chamber asked							
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other		Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
Option A: Mandatory testing	3	3	5	3	9	6	2	4	1	0	6	0	1	3		2	1	1	2	0	0	8	9
Option B: Optional testing	1	1	5	3	3	1	0	4	0	2	4	1	1	0		3	0	0	0	0	1	6	3
Total	4	4	10	6	12	7	2	8	1	2	10	1	2	3		5	1	1	2	0	1	14	12
Option A: Mandatory testing	75%	75%	50%	50%	75%	86%	100%	50%	100%	0%	60%	0%	50%	100%		40%	100%	100%	100%		0%	57%	75%
Option B: Optional testing	25%	25%	50%	50%	25%	14%	0%	50%	0%	100%	40%	100%	50%	0%		60%	0%	0%	0%		100%	43%	25%

c) Share your main suggestion regarding this change.

Suggestions from FSC NP that supported Option A:

"I am really confused as to what "field testing" would look like for a RA, particularly if there are no control measures included, or they are not mandatory. I have selected Option A... but I believe that the expectation for testing should be limited to only requirements that are significantly changed, or that are new..."

"I have some concerns about the opportunity to not field test revised FSS produced as part of a scheduled revision. I'm concerned this will lower the quality of the standard and lead to more follow-up work following its publication with interpretation requests and what not."

"In general we don't test enough, we don't do enough impact analysis and we then face a lot of problems/criticism at the implementation phase. So not making testing mandatory seems to be a very bad idea (even for "regular" processes I'd say)..."

"...When drafting such a requirement, everything is simple on paper and when we are sitting on a desk. However, the reality on the ground may be different: it may be too complex, data may not exist, government policies may put you in a difficult position, the scale of the operation may turn the requirement in something almost impossible, etc... It is very important to test the effect on the ground and the impact on certificate holder and that, in real life scenario, and in different contexts. We need to demonstrate, to our certificate holders and stakeholders, that we know what we are talking about... Even when we are testing, we are not necessarily getting all the information and unintended impacts. We cannot do the impossible but some testing should be a

minimum (even more important than large public consultations which often remain quite theoretical). Testing is helping us to make the fine tuning that sometimes make the difference! However, the number of test and how we are testing should remain flexible!”

Suggestions from FSC NP that supported Option B:

“give the working group the opportunity to determine this upon the context.”

“One aim of the revision is to incorporate outcome orientation in FSS and RA process. And efficiency and streamline are also important. Project lead should be given the right and flexibility to judge if the test is necessary or not.”

Nr	Key Stakeholder Feedback	FSC’s comment
1	Mandatory testing for revisions under major processes.	The Clause 7.5 of draft FSC-PRO-60-006 specifies requirement for mandatory testing of the draft for all major processes. In the case of regular is optional, and for accelerated to be determined on a case-by-cases basis. Regarding the type of testing to be used, it can be field or desk testing.

Key change # 11 The FSS and RA will be subject to at least two consultations

Number of mandatory consultations:

- Major process: two
- Regular process: two
- Accelerated process: one if justified, otherwise two.

Alternative to carry out more consultations.

a) Do you support this change?

Level of acceptance = 94%, 33/35 replies

Stakeholder group expected to be directly impacted by key change is highlighted.

Q11.2.	11.2. Do you support this change?																					
	Region					Type org. cleaned										Chamber asked						
Responses	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other	Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
	2	3	7	5	6	4	2	3	1	2	7	1	1	2	3	1	0	2	0	1	9	7
	1	1	2	0	6	3	0	2	0	2	2	0	1	0	1	0	0	1	0	0	4	4
	0	0	2	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	2	0
	Total	3	4	11	5	12	7	2	7	1	4	9	1	2	2	4	1	0	3	0	1	15
Agreement + Partial	100%	100%	82%	100%	100%	100%	100%	71%	100%	100%	100%	100%	100%	100%	100%	100%		100%		100%	87%	100%
Total disagreement	0%	0%	18%	0%	0%	0%	0%	29%	0%	0%	0%	0%	0%	0%	0%	0%		0%		0%	13%	0%

b) Share your main suggestion regarding this change.

Nr	Key Stakeholder Feedback	FSC's comment
1	Flexibility in consultations. Main proposers: Region: EU (2), NA (1). Chamber: Eco N (1), N/A (2). Stakeholder group: NP (2), Other (1). More details: "Some flexibility in that process should be possible (in term of #, duration, scope and outreach)" One public draft consultation mandatory for all processes when no new outstanding issues/concerns are identified during the consultation, otherwise two mandatory public draft consultations.	The draft of FSC-PRO-60-006 includes a requirement for responsible body to plan consultations for each process type (e.g., rounds, duration, scope and outreach) in agreement with FSC during the registration of the process.

2 No consultation for administrative accelerated processes.

Main proposers:

Region: EU (1), AP (1).

Chamber: (0).

Stakeholder group: NP (2).

More details:

“Conceptual consultation shouldn’t count as a draft consultation. The conceptual consultation is not mandatory. In an accelerated process just for word revision will be mandatory to do at least one consultation”

In order to ensure alignment among our requirements, a focused consultation will be required for all accelerated processes.

Suggestions from FSC NP that did not support the proposed change:

“Major : 2 Regular : 1 mandatory (where a chamber balanced WG cannot be put in place – case of actual INS – there is in general too few stakeholders to be worth 2 drafts consultations). Accelerated : how in hell do you want to accelerate anything with consultations? Either it is an issue of integrity and FSC should decide/impose (with the possibility to run a consultation but nothing mandatory) or it is an administrative revision and a consultation is useless.”

c) Should the consultations (conceptual and draft) in a process be counted equally, as in FSC-PRO-01-001?

(Yes, counted equally: 78%, 28/36 votes)

(No, counted separately: 22%, 8/36 votes)

Stakeholder group expected to be directly impacted by key change is highlighted.

Responses	Region					Type org. cleaned										Chamber asked							
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other		Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
Yes, counted equally	3	3	10	4	8	4	2	4	1	4	8	1	1	3		4	1	0	2	0	1	12	8
No, counted separately	0	1	3	1	3	2	0	4	0	0	1	0	1	0		0	0	0	1	0	0	4	3
Total	3	4	13	5	11	6	2	8	1	4	9	1	2	3		4	1	0	3	0	1	16	11
Yes, counted equally	100%	75%	77%	80%	73%	67%	100%	50%	100%	100%	89%	100%	50%	100%		100%	100%		67%		100%	75%	73%
No, counted separately	0%	25%	23%	20%	27%	33%	0%	50%	0%	0%	11%	0%	50%	0%		0%	0%		33%		0%	25%	27%

Rationale from FSC NP that supported “Yes”:

“...conceptual phase is a brilliant idea. For any revisions – but especially for revising or developing FSS. To share the expectations from different chambers and stakeholders on the revision is crucial, as well as to agree on an overall goal - what do we want to achieve with the FSS in our country? How does align with the P&C (or IGI)? It is also high value to give the SDG the mandate to develop/revise the standard – and if necessary to limit the mandate if the revision shall be more focused. To give the conceptual phase sufficient time is important – and can be a good investment to avoid conflicts later in the process if there is agreement among the national parties on what the revision shall achieve. With a good conceptual phase the rest of the standard development or revision can get smoother. And thus maybe one draft consultation can be enough. This is also about what is an acceptable time frame for a revision. One more draft consultation will prolong the revision at least 6 months, but more likely 9-12 months (development of new draft, consultation period, evaluation of comments, adaptation). Full draft consultations may not very effective. A lot of detailed responses that creates a lot of work in summing up and evaluate, and possibly to adapt, and to response in the consultation report even if there is no adaptation. For many requirements the SDG has already agreed and the comments are not providing useful information – just causing more work for the NP and the SDG. And may cause a lot of detailed work and false expectations from the respondent. One draft consultation may be enough if the conceptual phase is done well and thorough.”

Rationale from FSC NP that supported “No”:

“...from a great conceptual idea to the detailed wording of requirements you can have a big gap. I like the idea of conceptual consultation with potentially 2 purposes: 1) frame the revision process at an early stage; 2) to engage with a wider range of stakeholder who would like to comment on conceptual approach but wouldn't have time to dive into the details of the working of requirements (so together with a draft consultation, as a 2-layers consultation). But giving the opportunity to “specialists” to comment on those details is equally important and in my experience (having led 3 FSS development/revision processes) there is a clear maturation of ideas, progress in negotiation and clarity/quality of wording between the 2 draft consultations. In any case I wouldn't make conceptual and draft consultation equivalent automatically, but the option could be open in some cases and/or based on a rationale by the responsible body (e.g. partial revision).”

“This links to our concerns regarding the use of focused consultations, particularly during the conceptual phase. The focused consultations are often missed by stakeholders and there is also a risk that the relevance of participating in the conceptual phase is not recognised. Whilst we welcome the introduction of the conceptual phase, we believe that this should be in addition to the normal consultation requirements.”

“...But my opinion is that for the conceptual consultation, once is enough, could add if needed, depends on the situation. For the draft consultation, at least two consultation are better...”

Nr	Key Stakeholder Feedback	FSC's comment
1	Consultations (conceptual and draft) should be equally counted, as in FSC-PRO-01-001.	The draft of FSC-PRO-60-006 requires two consultations in the case of major process, one at the conceptual phase and one during drafting. In the case of regular accelerated, one is always required during drafting phase.

Key change # 12 FSS and RA's review period will be maximum 5 years

The responsible body will be responsible for preparing and submitting the **review report** to FSC **no later than 5 years after the effective date** for the version under its responsibility.

a) Do you support this change?

Level of acceptance = 97%, 36/37 replies

Stakeholder group expected to be directly impacted by key change is highlighted.

Q12.1. Responses	12.1. Do you support this change?															Chamber asked							
	Region					Type org. cleaned																	
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other		Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
I support it	3	3	12	2	7	3	1	8	1	4	6	0	1	3		2	0	0	3	0	1	14	7
I partially support it	0	1	0	3	5	3	1	0	0	0	3	1	1	0		2	1	0	0	0	0	2	4
I do not support it	0	0	0	0	1	1	0	0	0	0	0	0	0	0		0	0	0	0	0	0	0	1
Total	3	4	12	5	13	7	2	8	1	4	9	1	2	3		4	1	0	3	0	1	16	12
Agreement + Partial	100%	100%	100%	100%	92%	86%	100%	100%	100%	100%	100%	100%	100%	100%		100%	100%		100%		100%	100%	92%
Total disagreement	0%	0%	0%	0%	8%	14%	0%	0%	0%	0%	0%	0%	0%	0%		0%	0%		0%		0%	0%	8%

Suggestions from SH that partially supported:

Longer time for preparing review report (ASI (1), Member (1)).

Submitting review report to FSC no later than 7 years after effective date for the version under its responsibility (CH (1)).

Flexible deadline case by case (CH (1)).

NOTE: No key comment from stakeholder is considered for this key change because of high level of acceptance (only 9 partially supporting it and one opposing to it). Nonetheless, it is important to highlight that the draft FSC-PRO-60-006 now specifies that the responsible body will conduct the review of FSC country requirements within five years from the transition end date of the FSC country requirements. In addition, the responsible body should start the review of FSC country requirements latest by the 4th year from the transition end date of the FSC country requirements.

Key change # 13 Transition and period of validity of FSS and RA aligned with FSC-PRO-01-001

The following was proposed:

- Period of validity**

From effective date until it is withdrawn or replaced by a new version.

- Transition period**

Major and regular processes: 18 months after effective date.

Accelerated processes: to be determined case by case.

a) Do you support this change?

Level of acceptance = 100%, 35/35 replies

Stakeholder group expected to be directly impacted by key change is highlighted.

Q13.1.	13.1. Do you support this change?																					
	Region					Type org. cleaned										Chamber asked						
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other	Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied
Responses																						
I support it	2	3	9	5	11	5	2	7	1	3	7	1	1	3	4	1	0	1	0	1	14	9
I partially support it	1	1	1	0	2	2	0	0	0	0	2	0	1	0	0	0	0	2	0	0	0	3
I do not support it	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	3	4	10	5	13	7	2	7	1	3	9	1	2	3	4	1	0	3	0	1	14	12
Agreement + Partial	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%		100%		100%	100%	100%
Total disagreement	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%		0%		0%	0%	0%

NOTE: No key comment from stakeholder is considered for this key change because of high level of acceptance (only 5 partially supporting it and no one opposing to it).

b) Should the effective dates be aligned with international procedure FSC-PRO-01-001 which will be 1st January and 1st July of every year?

(Effective dates aligned with FSC-PRO-01-001: 64%, 21/37 votes)

(Effective dates not aligned with FSC-PRO-01-001: 36%, 16/37 votes)

Stakeholder group expected to be directly impacted by key change is highlighted.

Responses	Region					Type org_cleaned										Chamber_asked							
	Africa	Asia Pacific	Europe	South and Central America	North America	CH	CB	FSC NP	FSC RD/RT	FSC Bonn	FSC Member	ASI staff	Consultant	Other	Eco S	Eco N	Env S	Env N	Soc S	Soc N	No member	Not replied	
	1	2	5	5	8	5	2	2	0	1	6	1	1	3	4	0	0	2	0	0	7	8	
	2	2	7	1	4	2	0	6	1	3	3	0	1	0	1	1	0	0	0	1	9	4	
Total	3	4	12	6	12	7	2	8	1	4	9	1	2	3	5	1	0	2	0	1	16	12	
Effective dates aligned	33%	50%	42%	83%	67%	71%	100%	25%	0%	25%	67%	100%	50%	100%	80%	0%	100%	0%	100%	0%	44%	67%	
Effective dates not aligned	67%	50%	58%	17%	33%	29%	0%	75%	100%	75%	33%	0%	50%	0%	20%	100%	0%	0%	100%	56%	33%		

Nr	Key Stakeholder Feedback	FSC's comment
1	Effective dates of FSS and RA should be aligned with those effective dates in FSC-PRO-01-001.	Requiring generic effective dates for the versions of the FSS and RA is not appropriate given the local scope of application. Local conditions determine the time needed for certificate holders and certification bodies to prepare for the implementation of new country requirements for certification. Having common effective dates for the versions of FSS and RA will streamline the implementation phases of these versions, but it will be a major challenge also for responsible bodies, process leads, working groups and FSC.

Additional suggestions from FSC NP that did not support the alignment:

“Restricting the effective dates to 1st January and 1st July could exacerbate delays with the approval process, thus further frustrating stakeholders. It could also lead to there being pressure on FSC at certain times of the year to approve the documents in time for the two allocated effective dates.”

“To have 2 effective periods won't work with the actual system (with PSC approval being very unpredictable) and remove the flexibility to adapt to needs in a specific context (CH want an as early as possible Standard because they are waiting for it for very long or CH needs more time to look at and implement a standard that is a very high bar compared to the previous one)”



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