



CONSULTATION REPORT FOR PHASE II REVISION (FSC- PRO-30-006)

Implementation of Motion 49/2021 "FSC Ecosystem
Services Procedure as a mitigation mechanism to meet
global market demand for net-zero and net-positive targets"

24/02/2025



Title:	Consultation Report for Phase II Revision (FSC-PRO-30-006)
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CONTENT

A.	Background Information	4
B.	Main stakeholders who provided responses in the consultation	5
C.	Key insights obtained from the consultation responses	7
D.	Abbreviations	9
1)	TOPIC 1: COMPENSATION/NEUTRALIZATION – IN NORMATIVE DOCUMENTS	11
2)	TOPIC 2: CARBON OFFSETTING:	15
3)	TOPIC 3: NET-POSITIVE OR NO-NET-LOSS BIODIVERSITY AND INTEGRATED NATURE-POSITIVE STRATEGIES (BIODIVERSITY-SPECIFIC ANALYSIS):	26
4)	TOPIC 4: WATER NEUTRALITY (WATER OFFSETTING)	38
5)	RESIDUAL IMPACTS	48
6)	TOPIC 6: VALIDATION AND VERIFICATION	55
7)	TOPIC 7: CLAIMS:	63
	Thank you	75

A. BACKGROUND INFORMATION

This report presents the analysis of the public consultation on the conceptual phase of implementing Motion 49/2021. Motion 49/2021 mandates the use of the Ecosystem Services Procedure as a mitigation mechanism to address global market demands for net-zero and net-positive targets. The conceptual phase focuses on achieving conceptual clarity, conducting an in-depth analysis, and assessing the benefits and risks associated with key remaining aspects of Motion 49/2021, including carbon offsetting, biodiversity offsetting, water offsetting, biodiversity credits, and the application of compensation at the residual impact stage.

The public consultation phase took place from December 16, 2024, to February 14, 2025, and included four webinars. The consultation materials featured the Conceptual Report of Motion 49/2021 (Phase II of the revision of the Ecosystem Services Procedure, FSC-PRO-30-006: Implementation of Motion 49/2021). This report provided:

- i. Conceptual clarifications on the remaining aspects of Motion 49/2021, including carbon offsetting, biodiversity offsetting, water offsetting, and biodiversity credits.
- ii. A gap analysis of the Ecosystem Services Procedure against the requirements for carbon offsetting, biodiversity offsetting, and biodiversity credits.
- iii. Concrete proposals and corresponding questions, systematically addressing each of the remaining aspects.

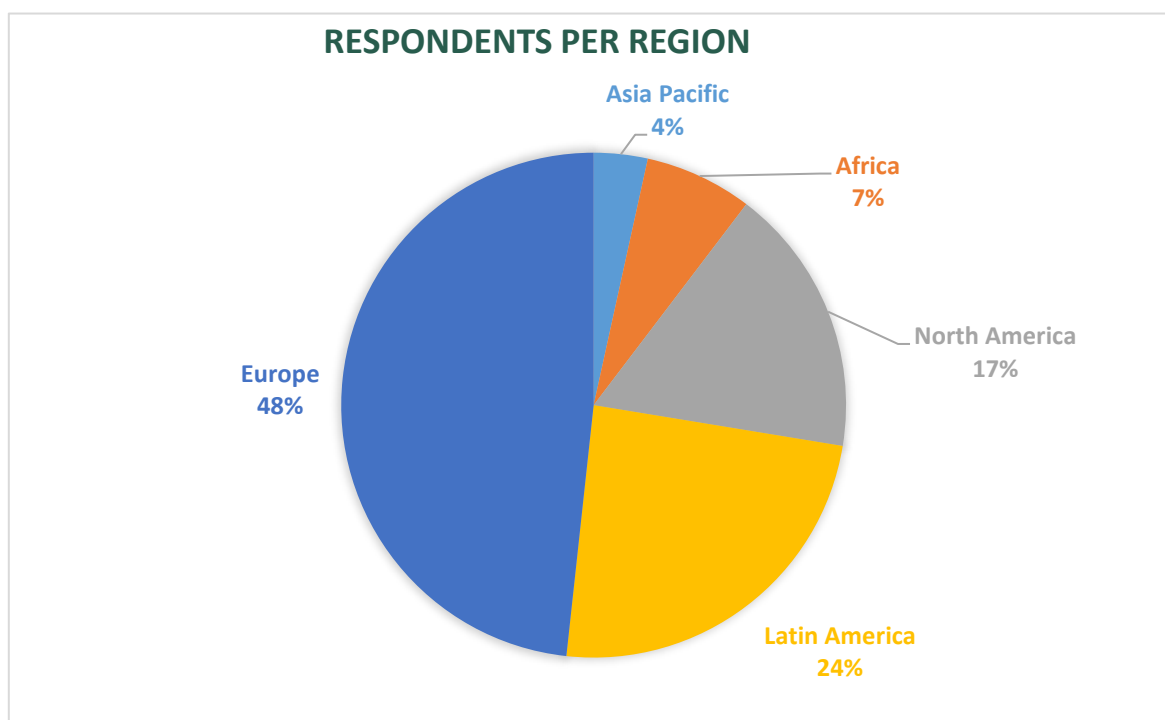
The inputs from respondents in this report are presented in alignment with the thematic structure of the Conceptual Report of Motion 49/2021.

During the conceptual phase, FSC, with the involvement of an external consultant, conducted extensive theoretical and market research, interviews, and stakeholder engagement to ensure that the revision process and the Terms of Reference (ToRs) are well-informed and substantiated. The analysis from this report will support FSC in developing the ToRs for the implementation of the remaining aspects, as mentioned above, of Motion 49/2021.

B. MAIN STAKEHOLDERS WHO PROVIDED RESPONSES IN THE CONSULTATION

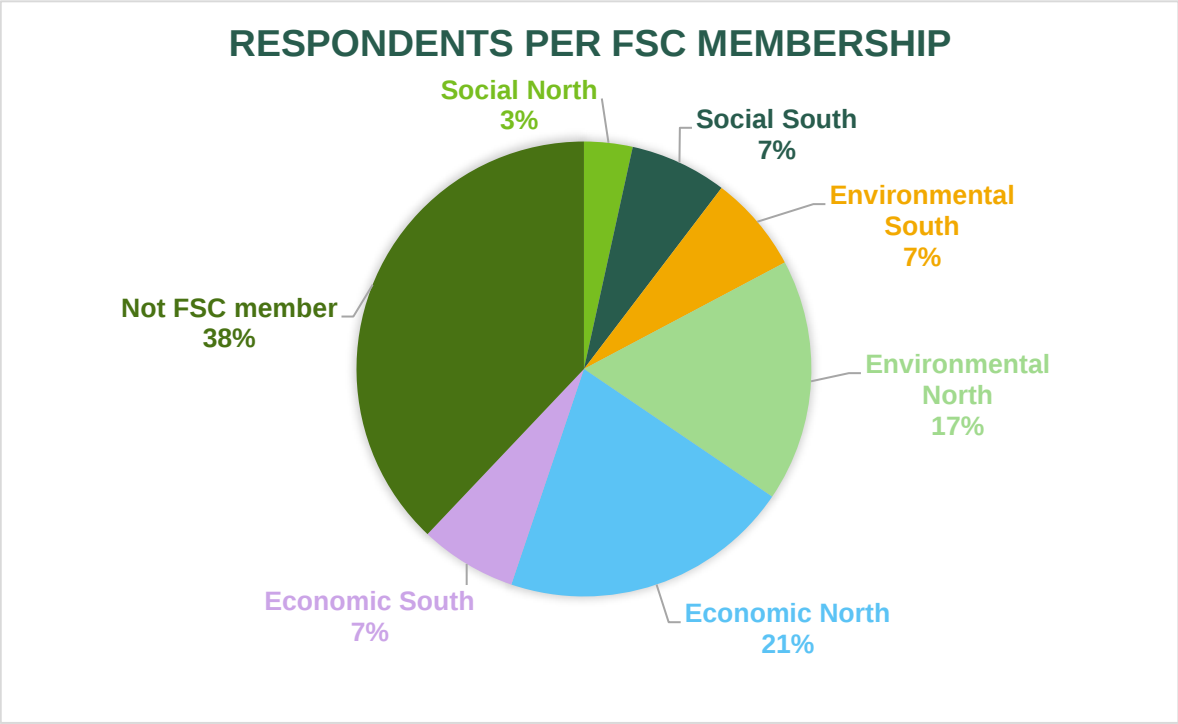
A total of 42 people registered, however, **29** people responded to the consultation questions.

Region: Almost half of the respondents were from Europe (14 respondents), followed by Latin America and North America.



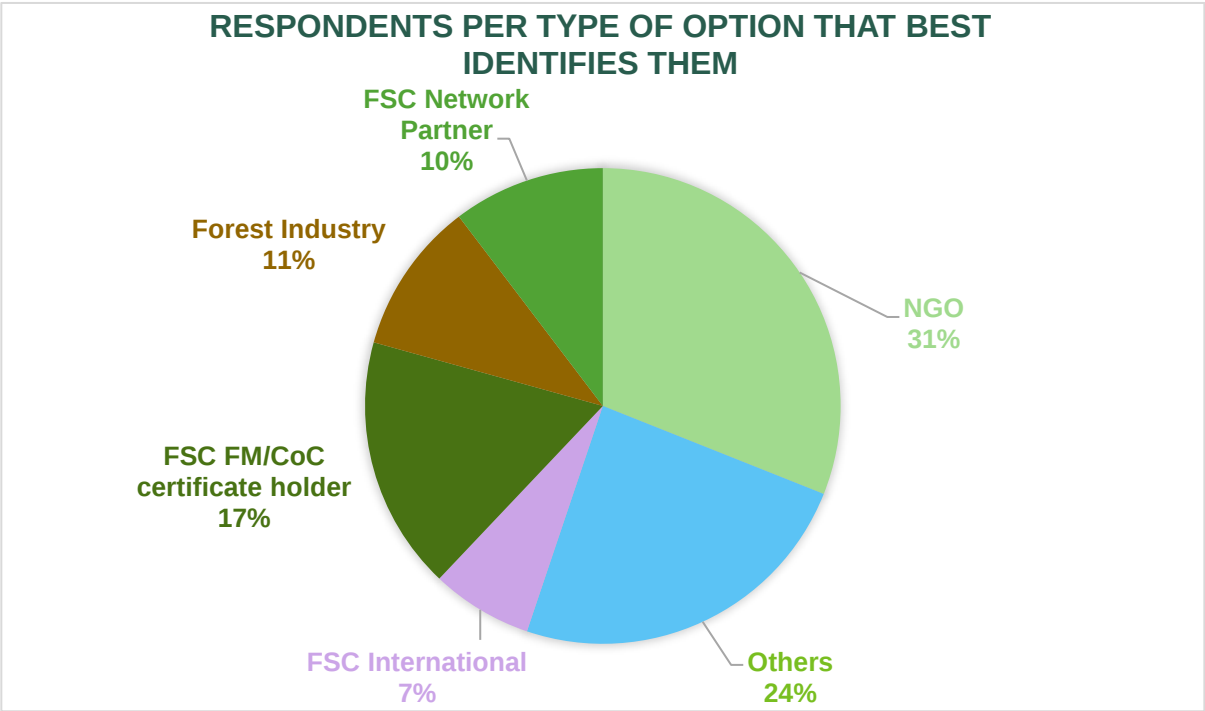
Membership: More than half of the respondents were “FSC members” (18 respondents).

Most of the member respondents belong to the “Economic chamber” (8 respondents), followed by the “Environmental chamber” (7 respondents) and the “Social chamber” (3 respondents).



Option that best identifies you: Participants were asked to identify themselves regarding the option that best identifies them. Many respondents that confirmed they are an “FSC member” (as per question “membership”) also selected options like “Certificate Holder” or “NGO” etc.

1/3 of the respondents were NGOs (9 respondents), followed by “Others” (Consultants, FSC Members), and more.



C. KEY INSIGHTS OBTAINED FROM THE CONSULTATION RESPONSES

The questions in the consultation were structured as per the Conceptual Report of Motion 49/2021.

Topics
1) COMPENSATION/NEUTRALIZATION – IN NORMATIVE DOCUMENTS
2) CARBON OFFSETTING
3) NET-POSITIVE OR NO-NET-LOSS BIODIVERSITY AND INTEGRATED NATURE-POSITIVE STRATEGIES (BIODIVERSITY-SPECIFIC ANALYSIS)
4) WATER NEUTRALITY (WATER OFFSETTING)
5) RESIDUAL IMPACTS
6) VALIDATION AND VERIFICATION
7) CLAIMS

Each topic included questions and justifications for the respective responses.

- Questions asked participants to choose an answer
 - between Yes and No, followed by justifications.
 - Between 0% agreement, 25% agreement, 75% agreement, 100% agreement, followed by justifications.
 - between different options i.e., categories for methodologies, a) Improved Forest Management (IFM) b) Afforestation/Reforestation etc.
 - for challenges/risks and benefits and related to suggestions/recommendations.
 - for collecting information i.e., if there are any metrics for water offsets etc.

The analysis of consultation responses is shown below, per topic.

1. Each topic analysis starts with a table showing the results of the questions.
2. The table shows the responses for each question for different categories i.e. FSC FM/CoC Certificate Holders, FSC Members, FSC Network Partners, Forest Industries, Academia/Research, Certification Body (CB), Project Developers, FSC International, and Others (include consultants, experts etc.).

3. Keep in mind that “FSC members” can also appear as “Certificate Holder” or in any other category under the “option that best identifies respondents”).
4. The numbers presented in the table indicate the responses in agreement for each category corresponding to the respective question. Additionally, the table provides the total number of respondents for each question, with FSC Members highlighted separately.
5. After each question, the consolidated feedback from selected responses is provided, followed by FSC’s responses where necessary.

D. ABBREVIATIONS

AAF	Annual Administration Fee
ACR	American Carbon Registry
AWS	Alliance for Water Stewardship
BBOP	Business and Biodiversity Offsets Program
BCA	Biodiversity Credit Alliance
CAR	Climate Action Reserve
CB	Certification body
CCP	Core Carbon Principles
CH	Certificate Holders
CoC	Chain of Custody
CRCF	Carbon Removal and Carbon Farming
FM	Forest Management
FSC	Forest Stewardship Council
GHG	Greenhouse Gases
HCV	High Conservation Value
IAPB	International Advisory Panel on Biodiversity Credits
ICVCM	Integrity Council for the Voluntary Carbon Market
IEC	International Electrotechnical Commission
IFC	International Finance Corporation
IFM	Improved Forest Management
IGI	International Generic Indicators
IPLC	Indigenous Peoples and Local Communities
ISO	International Organization for Standardization
IUCN	International Union for Conservation of Nature
MI/d	Megaliters per Day
NGO	Non-Governmental Organizations

P & C	Principles & Criteria
PS	Performance Standard
RTE	Rare, Threatened and Endangered
SBTi	Science Based Targets Initiative
SLIMF	Small or Low-Intensity Managed Forest
STAR	Species Threat Abatement and Restoration
ToR	Terms of Reference
WG	Working Group
VCMI	Voluntary Carbon Markets Integrity
VVB	Validation and Verification Body
WG	Working Group

1) TOPIC 1: COMPENSATION/NEUTRALIZATION – IN NORMATIVE DOCUMENTS

Question 1) Which one of the following options would you prefer FSC to pursue in Phase 2 for compensation/neutralization (carbon, biodiversity and water):

- a) Revise the Ecosystem Services Procedure to elevate existing requirements to a compensation (offsetting) use. This will allow one type of claim i.e., Compensation Claim.

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Certification body	Project developer	Forest Industry	Academia /research	Others
Respondents	25,0	17,0	3,0	7,0	1,0	5,0	0,0	0,0	2,0	0,0	7,0
Yes	7,0	12,0	0,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	4,0
No	18,0	5,0	3,0	5,0	1,0	4,0	0,0	0,0	2,0	0,0	3,0

Consolidated key feedback	FSC Responses
1 The general consensus is that this option should not be pursued, as it is complex and there is interest in Verified Impacts.	
2 This approach may be overly restrictive for smallholders and communities, potentially limiting their participation. Additionally, certain ecosystem services, such as water and soil, may not align well with a strict criteria-based compensation framework.	FSC agrees with it.

- b) Revise the Ecosystem Services Procedure with a focus on offsetting, along with the existing requirements to allow two types of claims i.e., Ecosystem Services Claims and Compensation Claims.

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Certification body	Project developer	Forest Industry	Academia / research	Others
Respondents	23,0	15,0	3,0	6,0	1,0	4,0	0,0	0,0	2,0	0,0	7,0
Yes	9,0	6,0	0,0	4,0	0,0	2,0	0,0	0,0	0,0	0,0	3,0
No	14,0	9,0	3,0	2,0	1,0	2,0	0,0	0,0	2,0	0,0	4,0

Consolidated key feedback	FSC Responses
1 This will make the document longer and more difficult to understand.	FSC agrees with it.
2 Complexity can introduce costs for the CHs discouraging them to pursue any of the claims.	FSC agrees with it.
3 No value is seen in overcomplicating the procedure.	FSC agrees with it.
4 It may weaken the Ecosystem Service Procedure.	FSC agrees with it.

- c) Create a separate normative document distinct from the current Ecosystem Services Procedure. The new normative document would cover requirements/safeguards for compensation (offsetting). Additionally, this main normative document will be supported by another normative document for respective methodologies. There will primarily be two main documents and two types of claims i.e., Ecosystem Services Claims and Compensation Claims.

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Certification body	Project developer	Forest Industry	Academia /research	Others
Respondents	15,0	10,0	2,0	6,0	1,0	2,0	0,0	0,0	2,0	0,0	2,0
Yes	10,0	7,0	1,0	2,0	0,0	2,0	0,0	0,0	0,0	0,0	5,0
No	15,0	10,0	2,0	6,0	1,0	2,0	0,0	0,0	2,0	0,0	2,0

Consolidated key feedback	FSC Responses
1 It is the most flexible solution giving different options to forest owners.	FSC agrees with it.
2 Because of the different requirements for offsetting and verified impacts, it makes complete sense to separate them.	FSC agrees with it.

Consolidated key feedback	FSC Responses
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3 It will be simpler for CHs, CBs and sponsors to understand and follow.

FSC agrees with it.

d) Any other option? Please specify.

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Certification body	Project developer	Forest Industry	Academia /research	Others
Respondents	10,0	7,0	1,0	0,0	0,0	3,0	0,0	0,0	2,0	0,0	4,0

Consolidated key feedback	FSC Responses
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FSC should carefully assess the need for offsetting claims, considering the extra work, resources, and potential risks to its integrity and credibility. Offsetting should be limited to voluntary ecosystem services and must not be included in Principles & Criteria (P&C) or International Generic Indicators (IGI) for Forest Management (FM) certification. We understand this is an early scoping consultation with limited visibility on future rules. If FSC expands the current ESP to include offsetting, clear and flexible

The additional work, resource demands, and potential risks associated with offsetting have been analyzed during the conceptual phase of Motion 49/2021. Detailed findings are available in the Final Technical Analysis Report. Furthermore, offsetting will remain voluntary and serve as an additional option for CHs to secure funding to support their responsible forest management practices. If FSC chooses to pursue carbon offsetting, clear and stringent rules and criteria will be established as part of the requirements, preferably aligned with frameworks such as the Integrity Council for the Voluntary Carbon Market

Consolidated key feedback	FSC Responses
rules on commitment length and withdrawal must be ensured.	(ICVCM) Carbon Core Principles (CCPs).
Maintain the current approach. FSC should focus on maximizing positive impacts and minimizing negative impacts of forest stewardship, avoiding any involvement in the ethically questionable complexities of offsetting.	If FSC pursues carbon offsetting, it will be regarded solely as a voluntary extra option, with appropriate and stringent safeguards in place, ensuring alignment with high-quality carbon benchmarks such as ICVCM CCPs.

2) TOPIC 2: CARBON OFFSETTING:

Question 1. Do you think that the ICVCM Core CCPs are a good reference for FSC in creating a high-quality carbon offsetting scheme?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	17,0	10,0	2,0	4,0	1,0	4,0	0,0	0,0	2,0	0,0	4,0
0% agreement	3,0	2,0	0,0	0,0	0,0	1,0	0,0	0,0	0,0	0,0	2,0
25% agreement	1,0	0,0	0,0	0,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0
75% agreement	7,0	5,0	1,0	2,0	0,0	2,0	0,0	0,0	2,0	0,0	0,0
100% agreement	6,0	3,0	1,0	2,0	1,0	0,0	0,0	0,0	0,0	0,0	2,0

Consolidated key feedback	FSC Responses
1 Carbon offsetting requirements must align with ICVCM and multilateral frameworks such as CRCF and Article 6 of the Paris Agreement.	Yes, FSC is fully aware of this. Therefore, if any carbon offsetting requirements are pursued, efforts will be made to align with other multilateral frameworks, such as Carbon Removal and Carbon Farming (CRCF) and Article 6 of the Paris Agreement, to develop the best possible requirements and safeguards for carbon offsetting.
2 FSC should also continue looking beyond ICVCM to further strengthen the requirements.	Same as above.
3 They are a good source but the resource required is a concern.	Yes, but pursuing them will ensure high-quality carbon credits that not only fetch the deserving prices for forest-based solutions but also support the livelihoods of Indigenous Peoples and Local Communities (IPLCs) involved in the area, while promoting biodiversity and strengthening the fight against climate change.
4 This could be a challenge for CHs, particularly small or low-intensity managed forest (SLIMFs), due to the complexity of aligning with external documents that contain intricate methodologies and requirements.	If FSC pursues this, it will remain an extra option. Any venture involves a feasibility study to determine its profitability, and entities interested in carbon offset projects would conduct such a study to assess viability. However, the added value of high-quality carbon credits—achieved by following benchmarks like ICVCM CCPs—alongside the premiums from FSC-certified areas could help CHs managing SLIMFs. These extra benefits may support responsible forest management and help offset associated costs.

Consolidated key feedback	FSC Responses
5 There's also the question of why FSC per se needs to develop an offsetting scheme when there are credible existing schemes that FSC can partner with.	If FSC pursues carbon offsetting, it does not intend to become a comprehensive carbon crediting scheme like Verra or Gold Standard. Instead, the focus will be on a single methodology, including normative requirements and criteria, rather than the numerous methodologies and sectoral approaches used by these schemes. The goal is not to transform into a full-scale carbon crediting program but to expand the options available to CHs, enabling them to secure financial support for their responsible forest management practices.
6 Majority of the respondents agree that the ICVCM CCPs are a good reference for FSC in creating a high-quality carbon offsetting scheme.	Aligned with the Public Consultation Proposal.

Question 2. Further, the technical analysis report indicates that FSC will need to develop its own methodologies rather than using those from external carbon crediting schemes, as relying on external methodologies creates integrity issues due to their associated compliance rules within the carbon crediting schemes from which the methodology originates.

a) Do you know any normative documents from other voluntary carbon schemes which FSC could use or refer to (methodologies, tools)?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	23,0	15,0	3,0	7,0	1,0	4,0	0,0	0,0	2,0	0,0	6,0

Yes	10,0	6,0	1,0	4,0	0,0	3,0	0,0	0,0	0,0	0,0	2,0
No	13,0	9,0	2,0	3,0	1,0	1,0	0,0	0,0	2,0	0,0	4,0

Consolidated key feedback	FSC Responses
1 Why the current external carbon schemes are inadequate for alignment? For afforestation specifically, FSC could look to the UK Woodland Carbon Code as the basis for methodologies/requirements, although this would require significant adaptation for global use.	Alignment and adoption are two distinct approaches. As identified in the technical and interview analyses, adopting external methodologies would pose significant challenges, particularly in developing a credible assurance system for verifying claims. Alignment, on the other hand, means ensuring that FSC's approach to carbon offsetting follows high-quality benchmarks and best practices. Therefore, if FSC pursues carbon offsetting, it will remain open to alignment with leading benchmarks and best practices.
2 Verra, Gold Standard, American Carbon Registry (ACR), Climate Action Reserve (CAR), Plan Vivo should be explored for any such tools.	For tools, all possible options, such as those for additionality assessment or non-permanence, will be explored. In the Voluntary Carbon Market, tools are distinct from methodologies. Please refer to the definitions section for the respective definitions.

b) Would you consider any challenges for FSC using external documents (methodologies, tools)?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	22,0	14,0	3,0	6,0	1,0	4,0	0,0	0,0	2,0	0,0	6,0
Yes	10,0	5,0	1,0	2,0	0,0	2,0	0,0	0,0	2,0	0,0	3,0
No	12,0	9,0	2,0	4,0	1,0	2,0	0,0	0,0	0,0	0,0	3,0

Consolidated key feedback		FSC Responses
1	FSC could adopt a methodology developed externally, as long as it is fully integrated into FSC's verification and validation mechanisms. This approach would help avoid integrity issues.	External methodologies are inherently tied to their respective normative frameworks, which cannot be bypassed. While an assurance system is essential for verifying claims, it must also align with the corresponding normative framework. This means that if FSC chooses to move in this direction, it would need to develop its own methodology—including normative requirements and criteria—along with a dedicated assurance system to support it. FSC simply cannot adopt external methodologies outright, as they are designed within different compliance frameworks and would not seamlessly integrate into FSC's system.
2	The use of external methodologies presents challenges such as integrity and compatibility issues, since they are designed under the rules of other schemes (Verra, Gold Standard, ACR) and may	FSC agrees with it.

Consolidated key feedback		FSC Responses
not align with FSC principles. Furthermore, dependence on third parties could generate instability if these methodologies change.		
3	Yes, FSC's reliance on external methodologies and its inability to influence their development or revisions pose a significant risk. If external schemes or documents undergo changes that diverge from FSC's objectives, FSC may be forced to switch to alternative reference schemes, particularly if revisions take an unfavorable direction. This could create instability and alignment challenges.	FSC agrees with it.
4	FSC should work in Partnership with other schemes.	Partnerships that ensure the best alignment with established best practices are always possible. Similarly, if FSC pursues carbon offsetting, it will align with the standard thresholds set by the ICVCM's CCPs Assessment Framework.

Question 3. How much do you agree with the proposal of creating a set of robust and high-integrity distinct normative requirements for carbon offsetting (as mentioned above)?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	17,0	11,0	2,0	5,0	0,0	3,0	0,0	0,0	0,0	0,0	7,0

0% agreement	6,0	4,0	0,0	0,0	0,0	2,0	0,0	0,0	0,0	0,0	4,0
25% agreement	3,0	1,0	2,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
75% agreement	3,0	2,0	0,0	3,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
100% agreement	5,0	4,0	0,0	1,0	0,0	1,0	0,0	0,0	0,0	0,0	3,0

Consolidated key feedback	FSC Responses
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1

Question 4. Which category of activities would you prefer that FSC develops a methodology for?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	20,0	20,0	2,0	6,0	1,0	4,0	0,0	0,0	2,0	0,0	5,0
Improved Forest Management (IFM)	13,0	13,0	2,0	4,0	1,0	3,0	0,0	0,0	2,0	0,0	1,0

Afforestation/Reforestation	7,0	7,0	0,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	4,0
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Consolidated key feedback	FSC Responses
1 IFM is a preferred category for developing the normative requirements i.e., methodology including criteria.	Noted. This will be evaluated further.

Question 5. If FSC develops a methodology for IFM, which category would you prefer for FSC to focus on?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	19,0	12,0	3,0	5,0	2,0	3,0	0,0	0,0	2,0	0,0	4,0
Extension of rotation age	6,0	4,0	3,0	2,0	0,0	0,0	0,0	0,0	0,0	0,0	1,0
Production to conservation	6,0	2,0	0,0	2,0	1,0	1,0	0,0	0,0	0,0	0,0	2,0
Increasing production	7,0	6,0	0,0	1,0	1,0	2,0	0,0	0,0	2,0	0,0	1,0

Consolidated key feedback	FSC Responses
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1

Question 6. What challenges/or risks do you anticipate in developing the normative requirements that fully comply with the requirements of the CCP? Please specify separately.

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia/ research	Others
Respondents	10,0	5,0	2,0	5,0	1,0	1,0	0,0	0,0	0,0	0,0	1,0

Consolidated key feedback	FSC Responses
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- | | | |
|---|--|---|
| 1 | <p>Carbon markets have existed for many years, and anyone with a project can participate in them. FSC certificate holders, if they choose, can already engage in carbon markets using existing methodologies and standards. I don't see FSC taking on this role, as it would require an immense amount of funding for a limited number of users. Those who want to participate in carbon markets are already doing so through established platforms.</p> | <p>The option of carbon offsetting is being explored in response to the requirements of Motion 49/2021. If FSC decides to pursue it, participation will remain voluntary. This means that CHs interested in carbon offsetting would not need to operate outside the FSC framework (if FSC develops one) or rely on external carbon crediting schemes. Instead, they could implement their projects within FSC's system, potentially reducing transaction costs.</p> |
|---|--|---|

Consolidated key feedback		FSC Responses
2	Achieve high integrity (e.g., governance, tracking, transparency), ensure compliance with social and environmental safeguards, and determine the market price (which remains a topic of debate).	Of course, there are challenges, but that is precisely why FSC aims to align with best practices and benchmarks, such as ICVCM's CCPs.
3	The ICVCM CCPs focuses primarily on carbon and climate, whereas FSC must balance a broader range of considerations, including social, environmental, economic, and climate aspects.	ICVCM's CCPs also include safeguards. Additionally, FSC already has strong safeguard provisions in place through its frameworks, but it will also seek alignment with best practices where applicable.

Question 7. What benefits do you foresee from developing normative requirements that are fully compliant with the CCP?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	11,0	6,0	2,0	5,0	1,0	2,0	0,0	0,0	0,0	0,0	1,0

Consolidated key feedback	FSC Responses
1 Ensuring high-quality credits enhances credibility in carbon markets, prevents greenwashing, and attracts investors. It also creates financial opportunities by enabling the sale of credits at premium prices and providing access to climate financing. Moreover, it delivers real, measurable, and permanent emission reductions, contributing to greater environmental and climate impact. Alignment with global standards facilitates participation in regulated markets and net-zero initiatives, while strengthening FSC certification further enhances its credibility, value, and appeal to more users.	Fully Agreed.

3) TOPIC 3: NET-POSITIVE OR NO-NET-LOSS BIODIVERSITY AND INTEGRATED NATURE-POSITIVE STRATEGIES (BIODIVERSITY-SPECIFIC ANALYSIS):

Question 1. The technical analysis report has highlighted issues related to the biodiversity offsets that could be translated into an integrity risk for FSC i.e., reputational and technical (requirements such as like-for-like replacement of habitats, species, etc., restriction to the local landscapes, mechanisms for strong regulatory enforcement, etc.).

a) Do you agree that FSC should pursue the option for biodiversity offsets?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	20,0	14,0	1,0	7,0	1,0	4,0	0,0	0,0	2,0	0,0	5,0
Yes	6,0	4,0	0,0	1,0	1,0	2,0	0,0	0,0	0,0	0,0	2,0
No	14,0	10,0	1,0	6,0	0,0	2,0	0,0	0,0	2,0	0,0	3,0

Consolidated key feedback	FSC Responses
1 It is too risky therefore in best interests to avoid.	Noted.
2 Biodiversity credits are worthwhile, but biodiversity offsets, especially in regard to rare, threatened or endangered species would be a step backwards.	Noted.
3 The Conceptual Report of Motion 49/2021 does a good job of highlighting important concerns with biodiversity offsets, which are serious enough that FSC should not pursue this option. Biodiversity and especially rare, threatened and endangered (RTE) species and RTE ecosystems should be protected wherever they exist. FSC should not be in the business of enabling and even greenwashing harm to biodiversity, especially to RTE species and ecosystems.	FSC appreciates it.
4 Diversity should be conserved as much as possible, additionally as stated in the Conceptual Report of Motion 49/2021, biodiversity credits do not imply a serious risk to the integrity of FSC	Noted.
5 Carbon accounting is bad enough, but maths involving gasses is one thing and maths involving lives is quite another. The idea that any loss of lives can be offset by other lives is morally repugnant and shows how detached humans have become from other living beings. It is a disgusting concept and FSC should have nothing to do with it.	Noted.
6 There is a reputational risk: FSC could be criticized for allowing biodiversity loss at one site in exchange for restoring it at another, generating accusations of greenwashing and affecting its credibility. Technical risks: Biodiversity is site-specific, making like-for-like replacement difficult. Furthermore, the lack of clear	Noted.

Consolidated key feedback

FSC Responses

regulations and possible impact leakages can compromise the effectiveness of offsets. Instead of offsets, FSC should focus on positive incentives for conservation, restoration and sustainable management that ensure real benefits to biodiversity without allowing avoidable losses.

b) If you agree that if FSC should pursue biodiversity offsets, should FSC limit the use of biodiversity offsets in any way (e.g. in terms of location, regulations, species, habitats, etc)?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	12,0	8,0	1,0	4,0	1,0	1,0	0,0	0,0	2,0	0,0	3,0
Yes	8,0	5,0	1,0	3,0	0,0	1,0	0,0	0,0	2,0	0,0	1,0
No	4,0	3,0	0,0	1,0	1,0	0,0	0,0	0,0	0,0	0,0	2,0

Consolidated key feedback	FSC Responses
1 Biodiversity offsets should not be pursued in the first place due to the significant risks they pose, both to FSC's integrity and to biodiversity itself.	Noted.
2 If offsets are considered, they should not be allowed for impacts on threatened or endangered species.	Regulation is a key concern here and FSC is not a regulatory authority.

Q2) Should the FSC develop a new normative document for the generation of robust biodiversity credits? Please justify.

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	19,0	13,0	3,0	3,0	0,0	0,0	0,0	0,0	3,0	0,0	10,0
0% agreement	4,0	3,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	4,0
25% agreement	3,0	1,0	3,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
75% agreement	6,0	4,0	0,0	2,0	0,0	0,0	0,0	0,0	2,0	0,0	2,0
100% agreement	6,0	5,0	0,0	1,0	0,0	0,0	0,0	0,0	1,0	0,0	4,0

Consolidated key feedback	FSC Responses
1 FSC should definitely work on biodiversity credits, but it is probably better to refer to external methodologies approved by the Biodiversity Credit Alliance (BCA) than to develop a methodology	FSC is already engaged with BCA, International Advisory Panel on Biodiversity Credits (IAPB), and the High Conservation Value (HCV) Network and will explore these partnerships further to jointly develop normative requirements for biodiversity credit generation
2 Since biodiversity credits are designed to fund additional biodiversity improvements rather than offset damage, they present a stronger option for FSC from a reputational perspective compared to biodiversity offsetting. Additionally, biodiversity credits would create a mechanism for FM CHs to receive concrete financial rewards for the biodiversity measures they already implement under FSC FM certification. This approach would diversify revenue streams from forests, lower the barrier for biodiversity initiatives, and support additional biodiversity measures. Furthermore, it could serve as a major attraction for FSC, encouraging new FM CHs to join and increasing FSC's global uptake. To maximize efficiency, FSC should leverage existing frameworks as much as possible to avoid unnecessary work and resource expenditures outside its core business of FM and CoC certification. Importantly, this should not result in increased Annual Administration Fee (AAF) costs for Certificate Holders.	No additional AAF costs are anticipated.
3 I think this is an emerging field with the biodiversity crisis, global biodiversity framework, and the 30X30 initiative, etc.	Yes, true.
4 I am open to FSC exploring the concept of biodiversity credits, as they are described in the Conceptual Report of Motion 49/2021,	Of course, this is an important distinction—biodiversity credits are not intended for and are not used for offsetting.

Consolidated key feedback

FSC Responses

and as distinct from biodiversity offsets. However, care needs to be taken that credits don't wind up serving as offsets with just another name. For example, sponsors should not be significantly harming biodiversity, and should not be harming RTE species or ecosystems at all, lest the credits serve as de facto offsets or greenwash.

- 5** FSC should develop a new regulatory document for biodiversity credits, ensuring a clear, transparent and high-integrity framework aligned with global standards such as those of the BCA. Including these criteria in the Ecosystem Services Procedure could generate confusion and overlapping requirements. Although the creation of this document requires time, resources and future adjustments, it would allow FSC to define its own methodologies and adapt to the evolution of the biodiversity credit market.
- Noted.

Q3) Should the FSC incorporate biodiversity credits' generation requirements in the Ecosystem Services Procedure for a separate category of biodiversity?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	17,0	12,0	1,0	4,0	1,0	3,0	0,0	0,0	3,0	0,0	5,0
0% agreement	6,0	4,0	0,0	1,0	1,0	0,0	0,0	0,0	0,0	0,0	4,0
25% agreement	8,0	5,0	1,0	2,0	0,0	1,0	0,0	0,0	3,0	0,0	1,0
75% agreement	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0

100% agreement	3,0	3,0	0,0	1,0	0,0	2,0	0,0	0,0	0,0	0,0	0,0
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Consolidated key feedback		FSC Responses
1	Due to the complexity of biodiversity credits and the potential need for more frequent updates compared to the current Ecosystem Services Procedure and its biodiversity claims, we do not support integrating biodiversity credits under the existing Ecosystem Services Procedure.	Noted.
2	This would be too complicated, particularly for smaller forests which do not have the resources. It would also create complications for auditors, already stretched due to lack of resources, and could result in fewer audits which are more costly, particularly if the FM chooses the credits.	Noted.
3	Including biodiversity credits in the Ecosystem Services Procedure could unify the regulatory structure, but would generate confusion, overlapping requirements and difficulties in implementation. Furthermore, this procedure was not designed for biodiversity credits, which could limit its alignment with emerging standards such as those of the BCA and restrict its flexibility in voluntary markets. To ensure clarity, credibility and adaptability, FSC should consider an independent regulatory document.	Noted.

Question 4. Should the FSC have the same criteria/safeguards for biodiversity credits and offsets (provided you agree with biodiversity offsets, please see Q1)?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	17,0	6,0	3,0	4,0	1,0	2,0	0,0	0,0	2,0	0,0	5,0
0% agreement	6,0	3,0	1,0	2,0	0,0	0,0	0,0	0,0	0,0	0,0	3,0
25% agreement	3,0	1,0	2,0	0,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0
75% agreement	4,0	0,0	0,0	0,0	0,0	1,0	0,0	0,0	2,0	0,0	1,0
100% agreement	4,0	2,0	0,0	2,0	1,0	0,0	0,0	0,0	0,0	0,0	1,0

Consolidated key feedback		FSC Responses
1	Offsets and credits are two very different tools delivering different things, so the criteria cannot be the same.	Fully agreed.
2	Since biodiversity credits do not compensate for damage but rather fund additional biodiversity improvements, their robustness is not as critical as biodiversity offsets, though still important. However, FSC's overall integrity and credibility, including FM and CoC certification, must not be compromised by weak safeguards or	Fully agreed.

Consolidated key feedback

FSC Responses

reputational risks in ecosystem services. Therefore, proper criteria and safeguards are essential for biodiversity credits as well.

Question 5) How much do you agree with the criteria highlighted by the technical analysis for generating robust biodiversity credits, namely additionality, accounting methodology, leakage, double counting and claiming, and traceability?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	19,0	12,0	3,0	6,0	1,0	2,0	0,0	0,0	2,0	0,0	5,0
0% agreement	3,0	2,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	3,0
25% agreement	1,0	1,0	0,0	0,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0
75% agreement	4,0	1,0	1,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0	2,0
100% agreement	11,0	8,0	2,0	6,0	0,0	1,0	0,0	0,0	2,0	0,0	0,0

Consolidated key feedback		FSC Responses
1	It is not an option that FSC's overall integrity and credibility (e.g. FM and CoC) would be undermined by weak safeguards and poor reputation in ecosystem services. That is why proper criteria and safeguards are needed to create robust biodiversity credits.	Fully agreed.
2	This is a thorough analysis of the criteria, and encompasses the main elements required to obtain robust credits which avoid the risk of greenwashing and ensure long-term benefits.	FSC appreciates it.
3	Applying criteria such as additionality, accounting methodology, leakages, double counting and traceability guarantees that biodiversity credits are verifiable, transparent and reliable in voluntary markets. In addition, it avoids greenwashing, ensures alignment with international standards and maximizes its impact on conservation. This strengthens FSC's credibility and the effectiveness of its biodiversity credits.	Fully agreed.

Question 6. Would you like to propose additional criteria for ensuring robust biodiversity credit generation?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	17,0	11,0	3,0	6,0	0,0	2,0	0,0	0,0	0,0	0,0	6,0
Yes	7,0	4,0	1,0	3,0	0,0	0,0	0,0	0,0	0,0	0,0	3,0
No	10,0	7,0	2,0	3,0	0,0	2,0	0,0	0,0	0,0	0,0	3,0



Consolidated key feedback	FSC Responses
1 All of the safeguards discussed earlier in the Conceptual Report should be included, e.g., limiting credits to the same ecosystem or locale. Measures should also prevent sponsors from using the existence of the credits to rationalize or greenwash their impacts.	FSC anticipates focusing on best practices, including the requirements and criteria necessary for generating robust biodiversity credits.
2 In addition to existing criteria, FSC should include permanence to ensure lasting benefits, proven ecological impact to assess ecosystem quality, local participation to promote social inclusion, and ecological connectivity to strengthen biological corridors. These measures would enhance the effectiveness, sustainability, and reliability of biodiversity credits.	Same as above.

Question 7. Biodiversity credit standards in voluntary markets may include various project categories, such as conservation (to avoid biodiversity loss) and restoration (to enhance biodiversity), among others. These categories can be used to calculate biodiversity outcomes in the form of biodiversity credits. Which options or categories would you prioritize for FSC to include in its normative document for generating biodiversity credits?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	18,0	12,0	3,0	6,0	1,0	2,0	0,0	0,0	2,0	0,0	18,0
Conservation	2,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	2,0
Restoration	4,0	2,0	1,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	4,0
Combined	12,0	8,0	2,0	4,0	1,0	2,0	0,0	0,0	2,0	0,0	12,0

Consolidated key feedback	FSC Responses
1 Preferably Conservation. The other can also be chosen; however, the alternative "combined" approach shall not be pursued.	Noted.
2 Although we argue for a different focus, if biodiversity credits are pursued then the focus should be on restoration-based credits as it is difficult to see how conservation focused credits could be judged as additional within the FSC FM normative framework.	Fully agreed. Something to be explored further, if FSC pursues it.

Consolidated key feedback	FSC Responses
3 Both will be important. I have a focus on conservation, but every area of the planet has different needs so both are important.	Noted.
4 Including conservation and restoration would allow for greater flexibility, impact, and financing in voluntary markets. Conservation prevents the loss of biodiversity, while restoration recovers degraded ecosystems, ensuring a more comprehensive approach aligned with global standards.	Noted. This will be further evaluated.

4) TOPIC 4: WATER NEUTRALITY (WATER OFFSETTING)

Question 1. The technical analysis report has not identified any renowned voluntary water neutrality/offsetting scheme. This can again raise integrity issues for FSC since the safeguards/criteria for generating robust water offset units are not well recognized. In that case, do you agree that FSC should pursue this option?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	19,0	12,0	3,0	5,0	0,0	3,0	0,0	0,0	2,0	0,0	6,0
Yes	4,0	3,0	0,0	2,0	0,0	0,0	0,0	0,0	0,0	0,0	2,0

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
No	15,0	9,0	3,0	3,0	0,0	3,0	0,0	0,0	2,0	0,0	4,0

Consolidated key feedback	FSC Responses
1 Majority of respondents prefer FSC NOT To pursue the option of water offsetting.	Noted. This will be included as a recommendation in the Final Analysis Report
2 The option was cited as low priority and or risky for FSC and should not be considered before biodiversity or carbon	Noted. This will be considered a low priority and, as such, will be recommended in the Final Analysis Report.

Question 2. Are you aware of any water neutrality/offsetting schemes being used globally or locally? Are there any water neutrality claims, in relation to this offsetting, that you are aware of?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	16,0	9,0	3,0	5,0	1,0	2,0	0,0	0,0	2,0	0,0	3,0

Consolidated key feedback	FSC Responses
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1 No scheme was identified.

Question 3. Are you aware of any metrics that can be used to calculate the water neutrality/offsetting units?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	15,0	10,0	3,0	5,0	1,0	2,0	0,0	0,0	2,0	0,0	2,0

Consolidated key feedback	FSC Responses
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1 Megaliters per day (Ml/d) has been suggested as the measurement unit for water offsets. This suggestion will be considered and further evaluated should FSC move forward with water offsetting.

Question 4. Can water neutrality/offsetting units;

- a) Be used globally, similar to carbon offsetting, where compensation can occur in different locations from where the impact happens? or

	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia/research	Others
Respondents	13,0	7,0	2,0	5,0	0,0	2,0	0,0	0,0	0,0	0,0	4,0
Yes	1,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	1,0
No	12,0	6,0	2,0	5,0	0,0	2,0	0,0	0,0	0,0	0,0	3,0

Consolidated key feedback	FSC Responses
1 The majority of respondents disagreed with the use of water offsets being applied globally, similar to carbon offsetting, where compensation can occur in different locations from where the impact happens.	Noted.

b) Be confined only to the same landscapes where the impact on the water resources due to the development occurred?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	14,0	9,0	2,0	6,0	0,0	2,0	0,0	0,0	0,0	0,0	4,0
Yes	11,0	8,0	1,0	5,0	0,0	2,0	0,0	0,0	0,0	0,0	3,0
No	3,0	1,0	1,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	1,0

Consolidated key feedback

FSC Responses

- 1 The majority of respondents strongly emphasized that water offsets should be confined to the same or similar landscapes where the impact on water resources has occurred.

Question 5. What types of projects or interventions do you think are most suitable for generating water neutrality/offsetting units?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	5,0	2,0	1,0	3,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback		FSC Responses
1	Some suggestions by the respondents included: i) Restoration of watersheds ii) Reforestation and conservation of water recharge areas to improve infiltration and water quality. iii) rainwater harvesting and runoff reduction. iv) Protection and restoration of wetlands – Wetlands act as natural filters, improve water quality and regulate the hydrological cycle. v) Projects that favor the infiltration of water into the subsoil to compensate for extractions.	These suggestions will be taken into account and further evaluated should FSC move forward with water offsetting.

Question 6. How should the pricing for water neutrality/offsetting units be done, in your opinion?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	7,0	3,0	1,0	3,0	0,0	2,0	0,0	0,0	0,0	0,0	1,0

Consolidated key feedback		FSC Responses
1	Some suggestions from the respondents included; Pricing for water neutrality/offset units should be based on local water stress, restoration costs, ecosystem value and monitoring. In addition, it must be progressive for large consumers and guarantee transparency to avoid abuses.	These suggestions will be taken into account and further evaluated should FSC move forward with water offsetting.

Question 7. Considering that there are no global water neutrality/offsetting schemes, and this area is not yet developed, would you agree that the FSC Ecosystem Service Procedure should keep the current approach with water ecosystem impacts with claims that can be used both for contribution and compensation/offsetting without further changes?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	17,0	11,0	3,0	5,0	1,0	2,0	0,0	0,0	2,0	0,0	4,0
Yes	9,0	7,0	0,0	3,0	1,0	2,0	0,0	0,0	2,0	0,0	1,0
No	8,0	4,0	3,0	2,0	0,0	0,0	0,0	0,0	0,0	0,0	3,0

Consolidated key feedback		FSC Responses
1	The majority of respondents have agreed that Ecosystem Services Procedure Verified Impacts for water can be used for water offsetting as well.	Offsetting requirements are generally different. Therefore, to mitigate risks, these requirements need to be strengthened to ensure their effectiveness in offsetting practices.

Question 8. If compensation claims in the water footprint calculation would be used, shall the water offset units include the same criteria/safeguards as for carbon compensation claims or carbon offset units (e.g. additionality, uncertainty, methodology, etc.)?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	14,0	9,0	1,0	5,0	0,0	3,0	0,0	0,0	2,0	0,0	3,0
Yes	7,0	6,0	1,0	2,0	0,0	2,0	0,0	0,0	2,0	0,0	0,0
No	7,0	3,0	0,0	3,0	0,0	1,0	0,0	0,0	0,0	0,0	3,0

Consolidated key feedback	FSC Responses
1 The responses were evenly split, with an equal number of respondents in favor and those disagreeing with the idea of using the same carbon offsetting requirements for water offsetting.	It may not be feasible to apply the same requirements, as the needs for carbon and water offsetting are distinct, similar to the differences observed between carbon and biodiversity offsetting.

Question 9. What are the risks and challenges you foresee for FSC in adopting and implementing water neutrality/offsetting option? Please specify separately.

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	10,0	7,0	1,0	4,0	0,0	2,0	0,0	0,0	2,0	0,0	1,0

Consolidated key feedback	FSC Responses
1 Some of the risks and challenges identified by respondents during the public consultation include: A) Risks: I. Lack of Global Standards – The absence of widely accepted regulatory frameworks for water compensation may affect the credibility and acceptance of an FSC scheme. II. Greenwashing – Without clear criteria, water offsets could be misused to justify irresponsible water consumption without ensuring a genuine positive impact on affected ecosystems. III. Measurement and Verification Challenges – Unlike carbon, water offsets lack standardized quantification methods, leading to uncertainty in their application. IV. Risks to Local Communities – Allowing intensive water use in certain areas through offsets could negatively impact local communities and ecosystems rather than providing benefits. B) Challenges: 1) Defining Clear Methodologies – FSC must develop specific criteria for quantification, additionality, and permanence etc of water compensation. 2) Ensuring Local Effectiveness – Water compensation should occur within the same affected watershed to provide tangible benefits to ecosystems and communities.	These risks and challenges will be taken into account if FSC pursues developing normative requirements for water offsets.

Consolidated key feedback

FSC Responses

- 3) **Aligning with Emerging Standards** – FSC must stay updated and adapt to new regulations or global frameworks on water neutrality.
- 4) **Avoiding Cost Overruns and Access Barriers** – The scheme should be economically viable and not create excessive burdens for small producers and certified communities.

5) RESIDUAL IMPACTS

Question 1. How much do you agree with the proposal for FSC to create normative requirements (criteria in a relevant normative document) for assessing whether the residual impact stage in biodiversity offsetting has been reached?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	20,0	14,0	2,0	5,0	1,0	4,0	0,0	0,0	2,0	0,0	6,0
0% agreement	6,0	4,0	0,0	1,0	0,0	1,0	0,0	0,0	0,0	0,0	4,0
25% agreement	3,0	1,0	0,0	0,0	0,0	2,0	0,0	0,0	0,0	0,0	1,0
75% agreement	3,0	3,0	0,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0
100% agreement	8,0	6,0	2,0	2,0	1,0	0,0	0,0	0,0	2,0	0,0	1,0

Consolidated key feedback	FSC Responses
1 Defining regulatory criteria would guarantee transparency, credibility and alignment with international standards in biodiversity offsets, avoiding their premature use and ensuring that they are applied only after exhausting mitigation measures.	Noted.
2 It is relevant to have these criteria in order to standardize processes.	Noted.

Question 2. Please provide suggestions on how to assess whether the residual impact stage in biodiversity offsetting has been reached.

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia / research	Others
Respondents	5,0	5,0	1,0	3,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback	FSC Responses
1 Must use international, tried and tested existing standards rather than investing significant time in developing our own.	Yes, the criteria will be aligned with established best practices and the most effective approaches available, with the possibility of adopting the best-suited ones i.e. in this case Science Based Targets Initiative (SBTi) standards and the Greenhouse Gases (GHG) Protocols
2 Strict application of the mitigation hierarchy: Require evidence that avoidance, minimization and restoration measures have been applied before resorting to offsets. Documentation that demonstrates previous efforts with clear indicators.	Agreed.

Question 3. How much do you agree with the proposal for FSC to create normative requirements that align with SBTi targets/GHG accounting by GHG Protocol i.e., GHG Protocol Scope 2 Guidance; and Corporate Value Chain (Scope 3) Accounting and Reporting Standard; Land Sector and Removals Guidance, Accounting and Reporting Requirements, for assessing whether the residual emissions stage in carbon offsetting has been reached?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	15,0	9,0	2,0	4,0	1,0	2,0	0,0	0,0	0,0	0,0	6,0
0% agreement	5,0	4,0	0,0	0,0	0,0	1,0	0,0	0,0	0,0	0,0	4,0
25% agreement	1,0	1,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0

75% agreement	2,0	0,0	0,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0	1,0
100% agreement	7,0	4,0	2,0	3,0	0,0	1,0	0,0	0,0	0,0	0,0	1,0

Consolidated key feedback	FSC Responses
1 Aligning FSC with SBTi and GHG Protocol would guarantee credibility, transparency and standardization in carbon accounting, avoiding premature offsets or greenwashing. Although it implies greater administrative burden and costs, it would strengthen the acceptance of FSC in voluntary markets and improve the integrity of the system.	Noted.

Question 4. Please provide suggestions on how to assess whether the residual emissions stage in carbon offsetting has been reached.

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	4,0	1,0	1,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback	FSC Responses
1 To ensure the integrity of carbon offsetting, alignment with international standards such as SBTi and the GHG Protocol is essential, verifying that all possible emission reduction measures have been implemented before resorting to offsets. Companies should provide detailed reports under the GHG Protocol Scope 2 & 3 and the Land Sector and Removals Guidance. Clear pre-offset reduction metrics must be established, including a defined percentage of absolute emissions reduction, the adoption of renewable energy, and the integration of carbon capture and storage in industrial processes. Independent third-party audits should be mandated to verify emissions reduction data, ensuring alignment with SBTi. Continuous monitoring and periodic reporting should be required, with annual progress reports ensuring emissions reductions are prioritized over offsets, supported by accountability mechanisms to prevent excessive reliance on carbon credits.	These points will be considered if the development of normative requirements for carbon offsetting is pursued.

Question 5. How much do you agree with the proposal for FSC to create normative requirements for assessing whether the residual impact stage in water offsetting has been reached?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	18,0	12,0	2,0	5,0	1,0	3,0	0,0	0,0	2,0	0,0	5,0
0% agreement	10,0	7,0	1,0	1,0	1,0	1,0	0,0	0,0	2,0	0,0	4,0
25% agreement	2,0	1,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	1,0
75% agreement	4,0	3,0	0,0	2,0	0,0	2,0	0,0	0,0	0,0	0,0	0,0
100% agreement	2,0	1,0	1,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback		FSC Responses
1	Defining regulatory criteria would guarantee transparency and control in water offsets, ensuring that they are only used when there are no alternatives to reduce the impact. Although global standards are lacking and verification can be complex, FSC could lead the development of a robust framework, ensuring that compensation is a last resort.	It will depend on whether FSC decides to pursue water offsetting and what the recommendations from this public consultation regarding water offsetting suggest. However, it should be noted that whatever FSC decides regarding water offsetting, it cannot function as a regulatory authority. FSC can only set normative requirements for water offsetting under its framework, but it does

Consolidated key feedback

FSC Responses

not have the legal authority to enforce regulatory criteria, which typically falls under the domain of government or other regulatory bodies.

Question 6. Please provide suggestions on how to assess whether the residual impact stage in water offsetting has been reached.

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	4,0	1,0	1,0	1,0	0,0	1,0	0,0	0,0	0,0	0,0	1,0

Consolidated key feedback

FSC Responses

- 1 No significant suggestions were identified from the responses received during the public consultation.

6) TOPIC 6: VALIDATION AND VERIFICATION

Question 1. Do you agree that the FSC should propose ISO/IEC 17029:2019 and ISO/IEC 14065:2020 as the relevant accreditation requirements for CBs intending to conduct activities related to carbon offsetting under the FSC Forest Management Certification?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	14,0	9,0	1,0	3,0	0,0	2,0	0,0	0,0	0,0	3,0	0,0
0% agreement	3,0	3,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
25% agreement	1,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	1,0	0,0
75% agreement	3,0	3,0	0,0	0,0	0,0	1,0	0,0	0,0	0,0	2,0	0,0
100% agreement	7,0	3,0	1,0	3,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback		FSC Responses
1	Aligning FSC with ISO/IEC 17029:2019 and ISO/IEC 14065:2020 would enhance credibility, transparency, and compatibility with both voluntary and regulated carbon markets. While this alignment	It is also envisaged that there will be an opportunity to compensate for the costs through higher quality carbon credits and the premiums generated from FSC-certified areas.

Consolidated key feedback		FSC Responses
may increase the administrative burden and costs for certification bodies (CBs), it would ultimately strengthen FSC's market acceptance and improve the quality of its certifications.		
2	Majority of the respondents agree that ISO/IEC 17029:2019 and ISO/IEC 14065:2020 are the relevant accreditation requirements for CBs intending to conduct carbon offsetting activities under the FSC Forest Management Certification	Aligned with the Public Consultation Proposal.

Question 2. Do you recommend any other ISO or international standard, in addition to ISO/IEC 17029:2019 and ISO/IEC 14065:2020, as the relevant accreditation requirements for CBs intending to conduct activities related to carbon offsetting under the FSC Forest Management Certification?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	4,0	1,0	1,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback		FSC Responses
1	Yes. In addition to ISO/IEC 17029:2019 and ISO/IEC 14065:2020, FSC should consider ISO 14064-3:2019 (GHG verification) and ISO 14067:2018 (product carbon footprint) to improve	Yes, some of them are already referenced/included in the ISO/IEC 14065, the others are not relevant for carbon offsetting.

Consolidated key feedback

FSC Responses

transparency and alignment with carbon markets. Other standards such as ISO 14090:2019 (climate resilience) and ISO 14046:2014 (water footprint) could strengthen the comprehensive evaluation of projects.

Question 3. Do you agree that FSC should accept accreditation to ISO/IEC 17029:2019 and ISO/IEC 14065:2020 from other accreditation programs as proxy accreditation, allowing an FSC CB holding such accreditation to qualify for conducting certification activities for carbon offsetting?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	12,0	8,0	0,0	3,0	0,0	3,0	0,0	0,0	0,0	2,0	0,0
0% agreement	3,0	2,0	0,0	0,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0
25% agreement	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
75% agreement	5,0	3,0	0,0	1,0	0,0	1,0	0,0	0,0	0,0	2,0	0,0
100% agreement	4,0	3,0	0,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback		FSC Responses
1	Accepting external accreditations under ISO/IEC 17029:2019 and ISO/IEC 14065:2020 would support the expansion of CBs, align FSC with international standards, and help reduce administrative costs. However, FSC must implement additional controls to prevent inconsistencies and ensure the rigorous application of its standards.	Yes, FSC will also develop its own normative requirements alongside these ISO standards for alignment with its own normative framework
2	Majority of the respondents agree for accepting accreditation to ISO/IEC 17029:2019 and ISO/IEC 14065:2020 from other accreditation programs.	Aligned with the Public Consultation Proposal.

Question 4. Do you recommend any accreditation body for ISO/IEC 17029:2019 and ISO/IEC 14065:2020 for carbon offsetting that FSC should exclude as a proxy accreditation, and why?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	4,0	1,0	1,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback		FSC Responses
1	It is not recommended to exclude accreditation bodies entirely, but FSC must rigorously evaluate each case to ensure that carbon offset certifications uphold the highest standards of integrity and transparency.	Sure, these are expected to be included in any future FSC normative requirements.

Question 5. Do you agree that CBs/Validation and Verification Bodies (VVBs)' conformity to ISO/IEC 17029:2019 and ISO/IEC 14065:2020 alone is insufficient and that FSC should adapt these ISO standards to its normative framework by specifying additional normative requirements, such as process requirements for carbon projects and personnel competency, etc.?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	8,0	4,0	1,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0
0% agreement	3,0	2,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
25% agreement	1,0	0,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
75% agreement	1,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
100% agreement	3,0	2,0	0,0	1,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback		FSC Responses
1	FSC must adapt ISO/IEC 17029:2019 and ISO/IEC 14065:2020 to its regulatory framework with additional requirements for carbon projects, guaranteeing greater transparency, alignment with its mission and rigorous control over certifications	Sure, FSC is expected to take these ISO standards i.e., ISO/IEC 17029:2019 and ISO/IEC 14065:2020 into consideration when developing its own normative requirements.
2	The majority of respondents do not agree that CBs/VVBs' conformity to ISO/IEC 17029:2019 and ISO/IEC 14065:2020 alone is insufficient. They do not see the need for FSC to adapt these ISO standards to its normative framework by specifying additional requirements, such as process requirements for carbon projects and personnel competency.	It will be presented as part of the Scope of Revision for WG.

Question 6. Is there a specific topic from ISO/IEC 17029:2019 and ISO/IEC 14065:2020 that you would recommend FSC to further specify in its additional normative requirements?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	6,0	2,0	1,0	2,0	0,0	2,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback		FSC Responses
1	FSC must specify additional criteria in its regulatory framework to guarantee the integrity of carbon compensation. This includes requirements for additionality and permanence, evaluation of socio-environmental impacts, long-term monitoring, and minimum competency standards for verifiers (i.e., VVBs). These measures will enhance transparency, ensure alignment with FSC's mission, and strengthen the credibility of carbon credits.	These requirements will be addressed through alignment with the ICVCM CCPs and its Assessment Framework, which provide adequate guidelines and standard thresholds for developing the essential criteria for high-quality carbon credits.

Question 7. Do you propose any international accreditation standards related to biodiversity offsetting, water offsetting, and biodiversity credits?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	4,0	1,0	1,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0



Consolidated key feedback		FSC Responses
1	Yes. FSC should consider the Business and Biodiversity Offsets Program (BBOP) and International Finance Corporation (IFC) Performance Standard 6 (PS6) for biodiversity offset, Alliance for Water Stewardship (AWS) and ISO 14046 for water, and follow the development of BCA and STAR for biodiversity credits. This would guarantee alignment with international standards and greater credibility in their certifications.	None of the mentioned standards are specifically accreditation standards for water offsetting. Additionally, ISO 14046, while relevant for water footprinting, is not designed for water offsetting purposes.

Question 8. Would you agree that liability and legal arrangements currently in place in FSC are strong enough to handle any potential issues (connected with million-dollar worth of claims)?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	7,0	2,0	1,0	2,0	0,0	1,0	0,0	0,0	0,0	2,0	0,0

Consolidated key feedback

FSC Responses

- 1 I am unsure whether FSC has a solid legal framework to manage multimillion-dollar compensation claims. If it does not, this could pose financial and reputational risks, along with a lack of clear mechanisms for dispute resolution.
- FSC, as a standard-setting body, will not bear financial responsibility in this case. Liability typically falls on project developers or VVBs (Validation and Verification Bodies), depending on the verification and assurance mechanisms in place. In the Voluntary Carbon Market, many carbon crediting schemes establish buffer pools, which are used to compensate for unexpected losses if a project fails. Ensuring permanence is a crucial criterion for high-quality carbon offsets. If FSC decides to pursue carbon offsetting, it will develop specific requirements to address permanence and other key safeguards.

7) TOPIC 7: CLAIMS:

Question 1. Do you consider that FSC should control the claims that sponsors/buyers make?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	19,0	12,0	3,0	6,0	1,0	2,0	0,0	0,0	0,0	2,0	0,0
Yes, looking for assurance as proposed by Step 4 of VCMI claims.	11,0	7,0	2,0	4,0	1,0	1,0	0,0	0,0	0,0	2,0	0,0

Yes, but limited to what FSC assures now.	5,0	3,0	1,0	1,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0
No, FSC should not control the claims of sponsors/buyers.	3,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
Yes, looking for assurance as proposed by Step 4 of VCMI claims.	19,0	12,0	3,0	6,0	1,0	2,0	0,0	0,0	0,0	2,0	0,0

Consolidated key feedback		FSC Responses
1	Majority of respondents agree that FSC should control claims that Sponsors / buyers make especially due to integrity risk related to offsetting	Aligned with Public Consultation proposals for Motion 49/2021.
2	Majority of respondents agree that FSC should aligned with VCMI criteria	Aligned with Public Consultation proposals for Motion 49/2021.
3	The minority if respondent who are not in favour of VCMI are concerned this could significantly increase resources required for Network Partners, who would have to undergo further training. This would add a financial burden to FSC Network Partners, FSC International, CBs and smaller claimants.	The reality of entering the carbon market is the complexity which is required to set a robust and high-integrity system. The use of the solution would remain voluntary and CHs who decide to enter the market would need to assess the selling price would cover the costs of effort.

Question 2. Should FSC enable corporate claims based on the concepts of compensation and neutralization (as defined in section 2.1. of the Conceptual Report of Motion 49/2021) by sponsors/buyers?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	19,0	12,0	3,0	6,0	1,0	2,0	0,0	0,0	0,0	2,0	0,0
Should FSC enable corporate claims based on the concepts of compensation and neutralization (as defined in section 2.1.) by sponsors/buyers?	17,0	11,0	2,0	5,0	1,0	3,0	0,0	0,0	0,0	2,0	0,0
Yes, for both concepts.	7,0	5,0	0,0	4,0	1,0	1,0	0,0	0,0	0,0	0,0	0,0
Yes, but restricted (elaborate on the restrictions you would propose)	4,0	0,0	2,0	1,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
No	6,0	6,0	0,0	0,0	0,0	2,0	0,0	0,0	0,0	2,0	0,0

Consolidated key feedback	FSC Responses
1 Majority of respondents agree that FSC should enable corporate claims based on the concept of compensation and neutralization.	This will be presented as part of the Scope of Revision for WG
2 Majority of respondents prefer the claims to be restricted to high integrity.	This will be presented as part of the Scope of Revision for WG

Question 3. Should FSC be fully aligned with the types of claims proposed by Voluntary Carbon Markets Integrity (VCMI) i.e.,

- **Carbon Integrity Silver (this requires the purchase and retirement of high-quality carbon credits equal to or greater than 10%, but less than 50%, of a company's remaining emissions after demonstrating progress toward its near-term emission reduction targets)**
- **Carbon Integrity Gold (this requires the purchase and retirement of high-quality carbon credits equal to or greater than 50%, but less than 100%, of a company's remaining emissions after demonstrating progress toward its near-term emission reduction targets).**
- **Carbon Integrity Platinum (requires the purchase and retirement of high-quality carbon credits equal to or greater than 100% of a company's remaining emissions after demonstrating progress toward its near-term emission reduction targets)?**

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	10,0	6,0	2,0	3,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0
Yes	5,0	2,0	2,0	2,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
No	5,0	4,0	0,0	1,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback		FSC Responses
1	The opinions are split 50/50 on the alignment with VCMI.	This will be further assessed during WG's scope of revision.
2	It will increase complexity and cost and is not attractive for CH. We need to be robust and simple to catch money on the market and support ecosystem services.	This will be further assessed during WG's scope of revision.

Question 4. What challenges/risks do you foresee in incorporating VCMI requirements for high-quality carbon credit claims within a relevant normative document in FSC? Please specify separately.

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	8,0	4,0	1,0	2,0	0,0	3,0	0,0	0,0	0,0	2,0	0,0

Consolidated key feedback	FSC Responses
1 Adapting to the VCMI Claims Code of Practice presents several challenges for FSC. Firstly, there are significant administrative responsibilities and costs involved, as the adaptation of these requirements would require more comprehensive processes and additional expenses for FSC certificate holders and credit processors. Secondly, FSC must also address capacity and adaptation requirements to ensure that companies, certifiers, and validators are able to effectively apply the VCMI criteria. Additionally, implementing a rigorous monitoring and auditing system will be necessary to ensure that companies comply with VCMI standards, which would require an independent verification process. There are also several risks associated with aligning FSC activities with the VCMI Code of Practice. One key concern is the exclusion of small actors due to the high costs involved, which could limit smaller businesses' access to the compensation market. Another risk is the dependence on external standards—if FSC	These challenges and risks will be evaluated if the development of normative offsetting requirements is pursued.

Consolidated key feedback

FSC Responses

aligns too closely with VCMI, it may lose autonomy in defining its own certification criteria. Finally, there is the possibility of **market resistance**—some businesses may view the more stringent VCMI requirements unfavorably, potentially reducing the adoption of FSC credits in the market.

Question 5. What benefits do you perceive in incorporating VCMI requirements for high-quality carbon credit claims within a relevant normative document in FSC?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	8,0	4,0	1,0	2,0	0,0	3,0	0,0	0,0	0,0	2,0	0,0

Consolidated key feedback

FSC Responses

- Incorporating VCMI into FSC provides credibility, transparency and acceptance in carbon markets, ensuring reduction of emissions before compensation and alignment with international standards. It
- The benefits highlighted are well noted and will be taken into account.

Consolidated key feedback

FSC Responses

also facilitates integration with future regulations.

Question 6. Addressing biodiversity at the corporate level is a complex issue that is not yet fully developed. Limited data availability for avoidance and reduction measures may make it challenging for FSC to effectively assess the mitigation hierarchy. Is it realistic that the FSC could evaluate the mitigation hierarchy of the sponsors seeking biodiversity offsets?

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	10,0	5,0	2,0	4,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0
Yes	3,0	3,0	0,0	2,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0
No	7,0	2,0	2,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback

FSC Responses

- The majority of respondents (7 out of 10) indicated that it is not realistic for FSC to evaluate the mitigation hierarchy of sponsors seeking biodiversity offsets, citing the complexity of addressing

Noted.

Consolidated key feedback

FSC Responses

biodiversity at the corporate level and the limited availability of data for avoidance and reduction measures.

Question 7. Are you aware of frameworks similar to the VCMI Code of Practice for biodiversity credits, biodiversity offsets, and water offsets? If yes, please list them separately for each category (biodiversity credits, biodiversity offsets, and water offsets).

			Option that best identifies you								
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	6,0	2,0	1,0	3,0	0,0	2,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback

FSC Responses

- Respondents did not identify any framework that directly corresponds to the VCMI Code of Practice for biodiversity credits, biodiversity offsets, or water offsets.
- Noted.

Question 8. Should the FSC also develop normative requirements for controlling claims for biodiversity offsets, water offsets, and biodiversity credits?

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	16,0	11,0	2,0	6,0	0,0	2,0	0,0	0,0	0,0	2,0	0,0
Yes	6,0	3,0	2,0	2,0	0,0	1,0	0,0	0,0	0,0	0,0	0,0
No	10,0	8,0	0,0	4,0	0,0	1,0	0,0	0,0	0,0	2,0	0,0

Consolidated key feedback		FSC Responses
1	The majority of respondents (10 out of 16) indicated that FSC should not develop normative requirements for controlling claims related to biodiversity offsets, water offsets, and biodiversity credits.	This will be further evaluated as part of the scope of the revision for the WG.

Question 9. What elements do you propose for the normative requirements for controlling claims related to biodiversity offsets, water offsets, and biodiversity credits? Please list them separately for biodiversity offsets, water offsets, and biodiversity credits.

	Option that best identifies you										
	Total	FSC Members	FSC Network Partner	NGOs	FSC International	FM/CoC certificate holder	Project developer	Certification body	Forest Industry	Academia /research	Others
Respondents	4,0	1,0	1,0	3,0	0,0	0,0	0,0	0,0	0,0	0,0	0,0

Consolidated key feedback		FSC Responses
1	Biodiversity offsets should comply with the mitigation hierarchy, ensuring offsets are used only after avoiding, minimizing, and restoring impacts, with ecological equivalence, independent verification, and transparent disclosure of long-term impacts. Water offsets should be confined to the same basin, use standardized measurement methods like ISO 14046, ensure actual net benefits for water availability and quality, and require third-party monitoring. Biodiversity credits should be based on verified biodiversity metrics, demonstrate proven additionality, maintain traceability with long-term monitoring, and align with standards such as the BCA and International Union for Conservation of Nature (IUCN) Species Threat Abatement and Restoration (STAR) while ensuring compatibility with corporate conservation commitments.	These suggestions will be further evaluated to determine their acceptance, feasibility, and alignment with FSC's objectives.

THANK YOU

On behalf of the FSC Climate and Ecosystem Services, and the FSC Forest Management programmes, thank you very much for providing your feedback in this consultation!

For further information about this revision process, please visit [our current processes](#) webpage on the FSC website.



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