

SYNOPSIS REPORT

Results of the public consultation on the draft ADVICE-20-007-23 V3-0 Converted area constituting 'very limited portion' in IGIs 6.9 – 6.11 and accounting for restoration



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FOREWORD AND INTRODUCTION

Introduction

FSC would like to thank members and stakeholders for their participation in the public consultation on the revised ADVICE-20-007-23 Converted area constituting ‘very limited portion’ in IGIs 6.9 – 6.11 and accounting for restoration” that took place between 12 September and 12 October 2025. The consultation aimed to collect feedback on the proposed revisions clarifying how restored converted areas may be accounted for within the limits established for “very limited portion”. The input received has been of great value to assess the overall level of agreement with this concept and the proposed conditions for its application.

This synopsis report has been prepared in accordance with Clause 5.12 of FSC-PRO-01-001 V4-0 Development and Revision of FSC Normative Documents Procedure and contains an overview of the stakeholder groups who participated, a summary of the comments received, and general responses explaining how the feedback has been considered in the development of version 3-0 of this Advice Note.

Background information on the process

FSC does not accept the conversion of natural forests, nor the conversion of High Conservation Value (HCV) areas in savannahs, grasslands, peatlands, and wetlands, or the transformation of plantations on sites directly converted from natural forest — except in cases where it affects a very limited portion of the management unit, generates conservation and social benefits, and does not damage or threaten HCVs.

Areas converted from natural forests between 1 December 1994 and 31 December 2020 that do not meet these conditions are only eligible for certification if remedy for the environmental and social harms caused by the conversion is provided, while areas converted after 31 December 2020 are not eligible for certification.

The definition of very limited portion in the FSC Principles and Criteria specifies that to be considered a very limited portion, the affected area shall not exceed 5% of the management unit, irrespective of whether conversion activities have taken place before or after the organization has obtained FSC Forest Management certification.

This third version of the Advice Note proposes an amendment to FSC’s definition of a ‘very limited portion’ of a forest that under certain conditions could be exempted from FSC’s zero deforestation rules¹. The definition which stipulates a maximum percentage of the area of a forest management unit for which such an exemption could be granted had been expanded by the earlier versions of this advice note to also include a maximum limit in hectares, based on a mandate provided by the 9th FSC General Assembly.

The new draft of this advice note has been developed to encourage and acknowledge certificate holders’ efforts to restore converted areas back to their earlier forest state: it clarifies the conditions under which these restored areas, which had been converted under FSC’s conversion rules, would no longer fall under the definition of a ‘very limited portion’ and thereby reduce the registered amount of areas being affected by conversion.

Areas converted prior to FSC’s 1994 cut-off date are not falling under relevant conversion rules nor would their restoration have to follow any particular conditions, for example when returning a plantation

¹ FSC does not accept the conversion of forests or other areas with high conservation values. An exemption can only be granted for a ‘very limited portion’ of a forest management unit and only if the conversion results in substantial conservation and social benefits. Areas converted after 2020 are not eligible for certification, while earlier converted areas from December 1994 onwards can only be certified if remedy for the environmental and social harms caused by the conversion is provided.

back to natural forest. In order to also incentivize the restoration of these areas, the new draft addresses and acknowledges such restoration efforts in the same way: if the proposed conditions for areas to be considered restored would be met, this would reduce any registered amount of converted area accordingly.

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ABBREVIATIONS

FSC Forest Stewardship Council

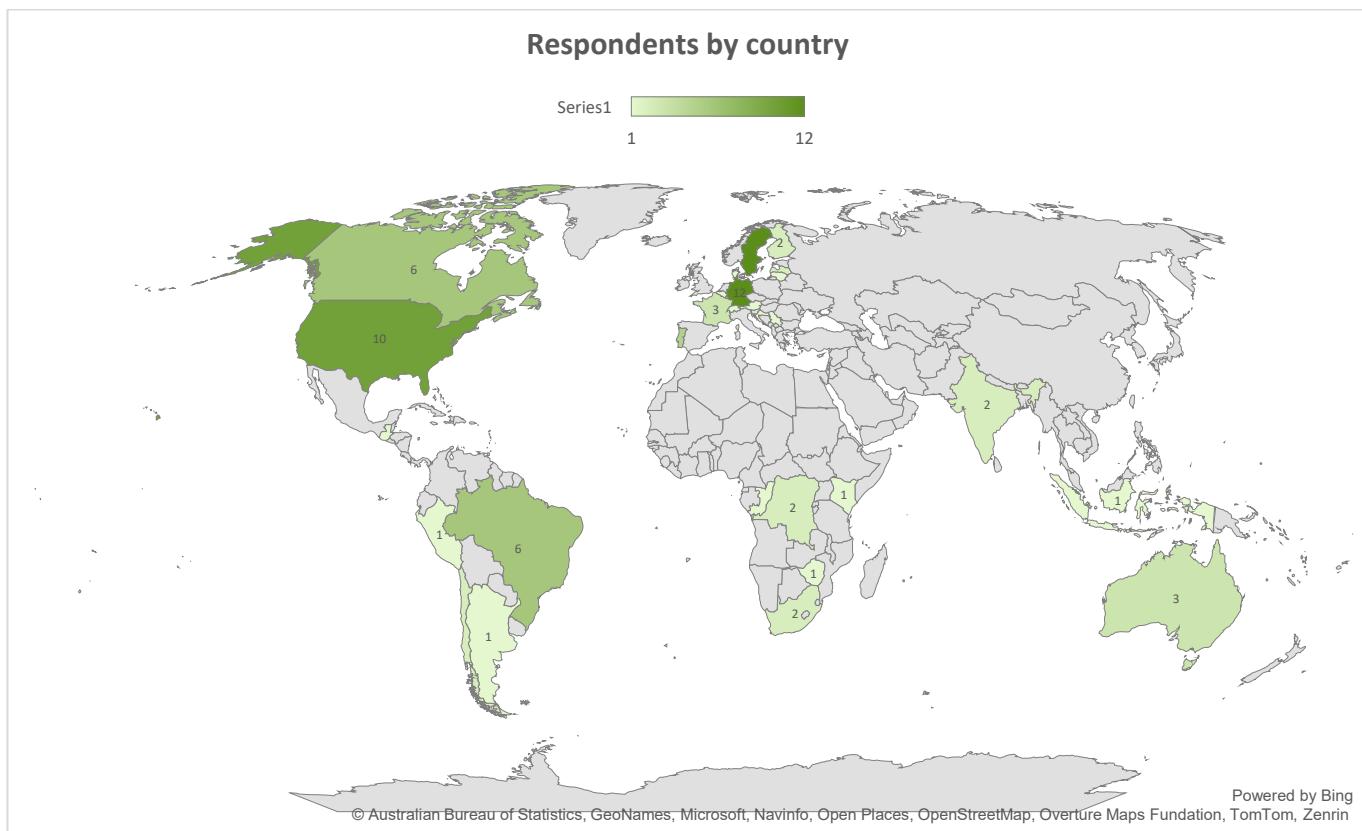
HCV High Conservation Value

TWG Technical Working Group

1. Feedback in numbers

A total of 83 stakeholders participated in the public consultation on the revised ADVICE-20-007-23 Converted area constituting 'very limited portion' in IGIs 6.9 – 6.11 and accounting for restoration, through the FSC Consultation Platform. The consultation included participants from 26 countries across five regions. Europe is the region with the highest number of participants, while Asia Pacific has the lowest number of participants. In terms of countries, Germany, Sweden, United States, Brazil, and Canada provided the highest number of respondents.

The participants' regional distribution is shown below:



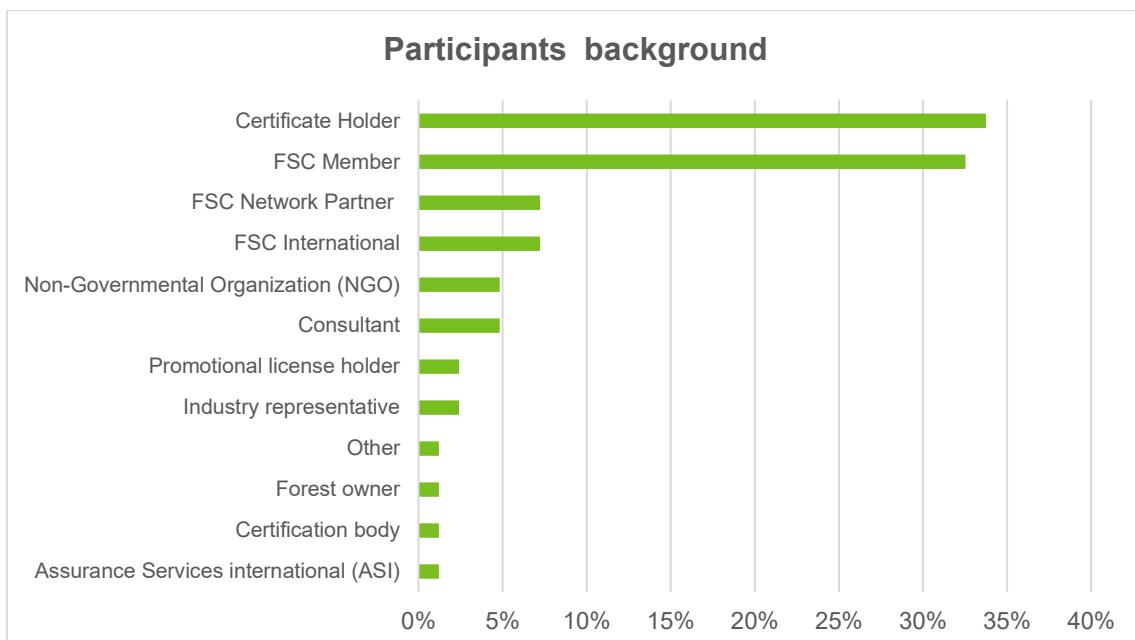
Country	Number of respondents	Region	Number of respondents
Germany	12	Europe	36
Sweden	12	North America	17
United States	10	Latin America	11
Brazil	6	Africa	7
Canada	6	Asia Pacific	3

Table 1: Countries with the highest number of respondents

Participant by background

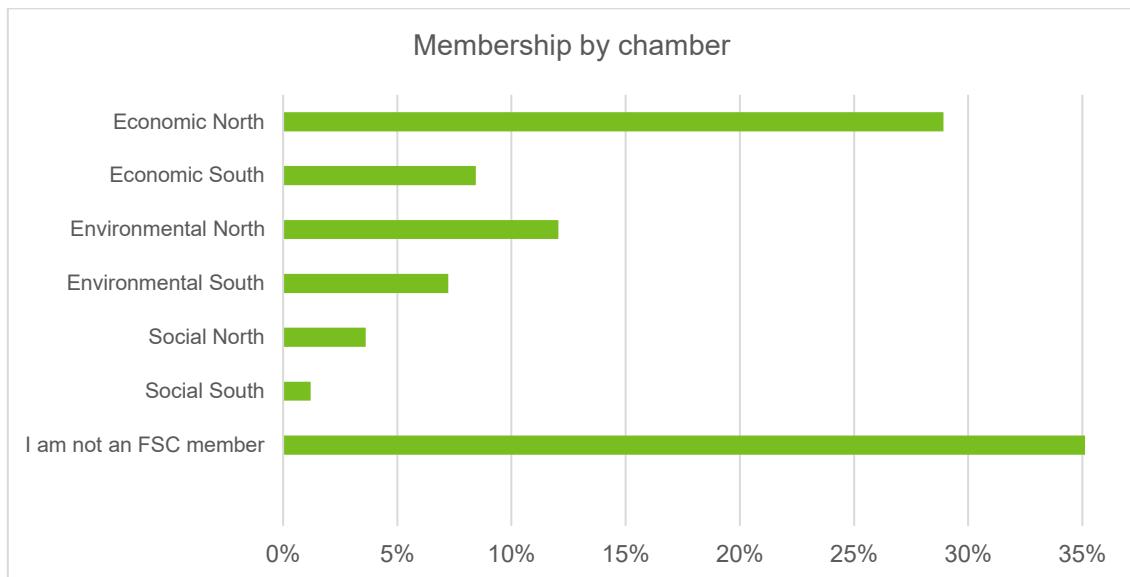
Respondents were asked to identify themselves by their respective background groups. Based on the responses, 83 participants are grouped into 12 different groups. These categories reflect self-identification and are not necessarily mutually exclusive.

Most respondents identified as Certificate Holders (36%) or FSC Members (35%), representing the two largest stakeholder groups in the consultation. Other stakeholder types, such as NGOs, consultants, and industry representatives, were represented to a lesser extent (each below 5%). The lowest participation came from Certification Bodies, Assurance Services International (ASI), and Forest Owners.



Participant by chamber

From the 83 participants the economic chamber showed the highest level of participation, representing 37% of all respondents. Environmental and social chambers accounted for 19% and 5%, respectively. Below is an overview of the number of participants by chamber. Finally, about one-third of participants (35%) identified as non-members of FSC.



2. Methodology

A three-step methodology was implemented for the analysis of consultation results. The process involved quantitative analysis, qualitative analysis, and TWG Technical Working Group discussion.

Quantitative analysis

The quantitative analysis was conducted using the Excel template provided by P&P. Participants' background information, including geographical distribution and stakeholder group, was presented descriptively to provide an overview of respondent profiles. Likert scale questions (from 1 – strongly disagree to 5 – strongly agree) were analyzed centrally during the first week after receiving the consultation feedback. For reporting purposes, the categories of agreement (strongly agree and agree) and disagreement (strongly disagree and disagree) were merged, respectively.

The analysis was conducted considering the requirement that all FSC normative documents should take into account the goals and aspirations of all stakeholder groups. The analysis was carried out according to the following categories: (1) background information of participants; (2) general stakeholder feedback; (3) feedback by stakeholder groups.

Qualitative analysis

Following the quantitative analysis, the consultation feedback was shared with the technical working group for in-depth analysis of the comments. Specific feedback has been selected and highlighted based on its frequency of appearance and its content.

TWG discussion

The quantitative and qualitative results from the consultation were then combined and presented to the P&PU's internal Technical Working Group (TWG).

3. Summary of consultation results

Below is a summary of key topics on which participants provided feedback. Each key topic contains the question posed during public consultation, quantitative results, and qualitative results. The qualitative results include an assessment and conclusions on how the comments were incorporated into the final revised advice note.

Question 1. To what extent do you agree with the concept that areas that had been converted under FSC conversion rules should no longer be accounted as areas affected by conversion once restored and the relevant overall record of converted area considered as ‘very limited portion’ should be reduced accordingly?

Overview:

In total 73 out of 83 respondents answered this question.

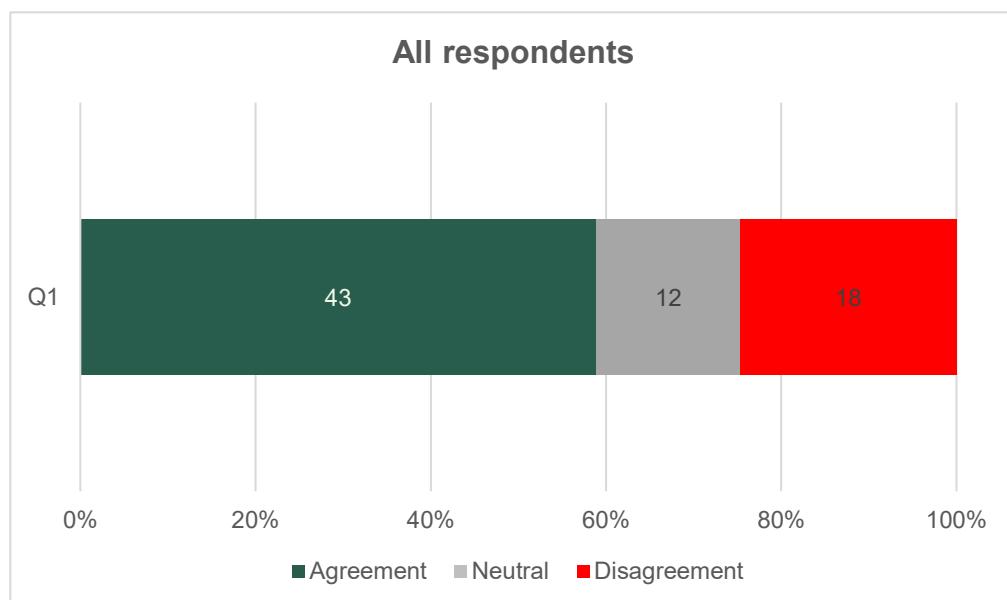
An outline of the results shows that:

Agree: 43 respondents – 59 %

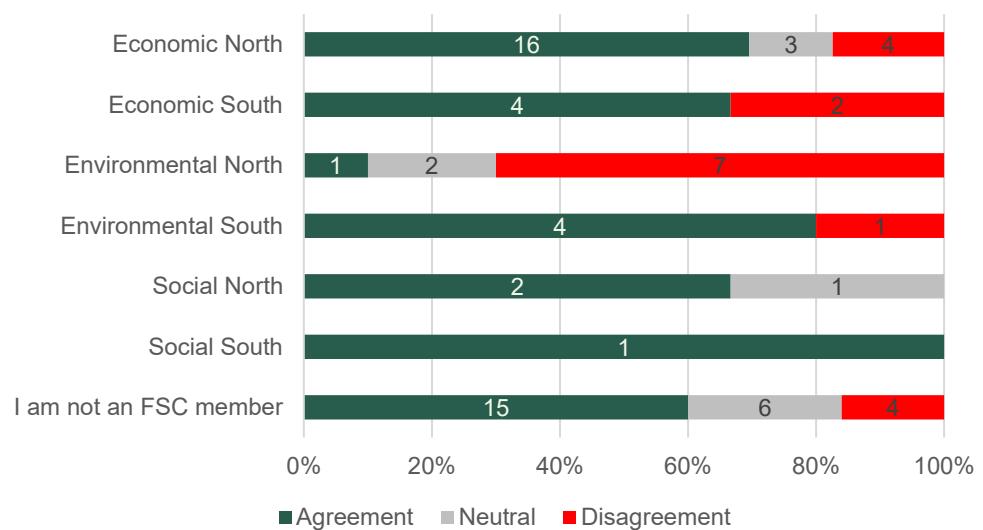
Neutral: 12 respondents – 16 %

Disagree: 18 respondents – 25 %

Results by all respondents



Totals, Non-members, and Members by sub-chamber



The overall distribution of responses shows that 59% of participants agreed with the proposal. The distribution of responses by sub-chamber shows that the highest levels of agreement came from participants in the Economic chamber and non-members. In contrast, the Environmental chamber.

These differing perspectives are reflected in the qualitative feedback summarized below.

Option	Comments
Recognition of restoration efforts	Many stakeholders welcomed the proposal as a constructive step to acknowledge and incentivize restoration within FSC's framework. They appreciated that the Advice Note encourages certificate holders to actively restore converted areas and rewards positive outcomes.
Concept of Compensation through Restoration	The proposed idea of removing restored areas from the conversion record is not supported by some stakeholders. Respondents argued that this introduces a compensation or offsetting mechanism, allowing organizations to balance new conversions with restoration. Comments insisted that restoration cannot "erase" past conversion.
Risk of Rolling or Continuous Conversion	The suggestion to subtract restored areas from the conversion record would enable repeated cycles of conversion and restoration. Some stakeholders mentioned that it could create a "rolling" conversion allowance and undermine FSC's zero-conversion principle. It was highlighted that such a mechanism could allow large MUs to continue converting new areas indefinitely, as long as equivalent areas are restored.
Integrity and Credibility of FSC's Conversion Safeguards	Allowing restoration to offset conversion was seen as a reputational risk that would reduce confidence in FSC's environmental integrity and alignment with global expectations such as the European Union Deforestation Regulation (EUDR).
Weakness of Restoration Criteria and Lack of Additionality	Feedback on this topic showed alignment across chambers, with similar concerns about the vagueness of "ecologically viable recovery potential" and the risk that organizations may claim credit for natural or legally required regeneration.

Table 2: Qualitative analysis Q1

Question 2. To what extent do you agree that the above concept should also be applied to areas converted prior to FSC's 1994 cut-off to also encourage the restoration of these areas?

Overview:

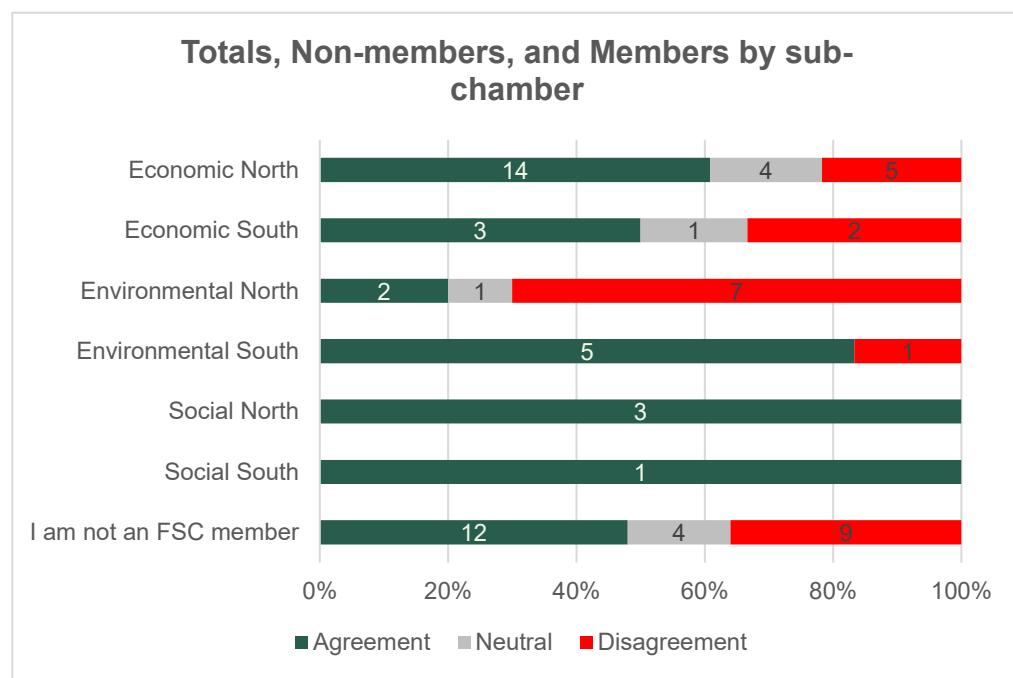
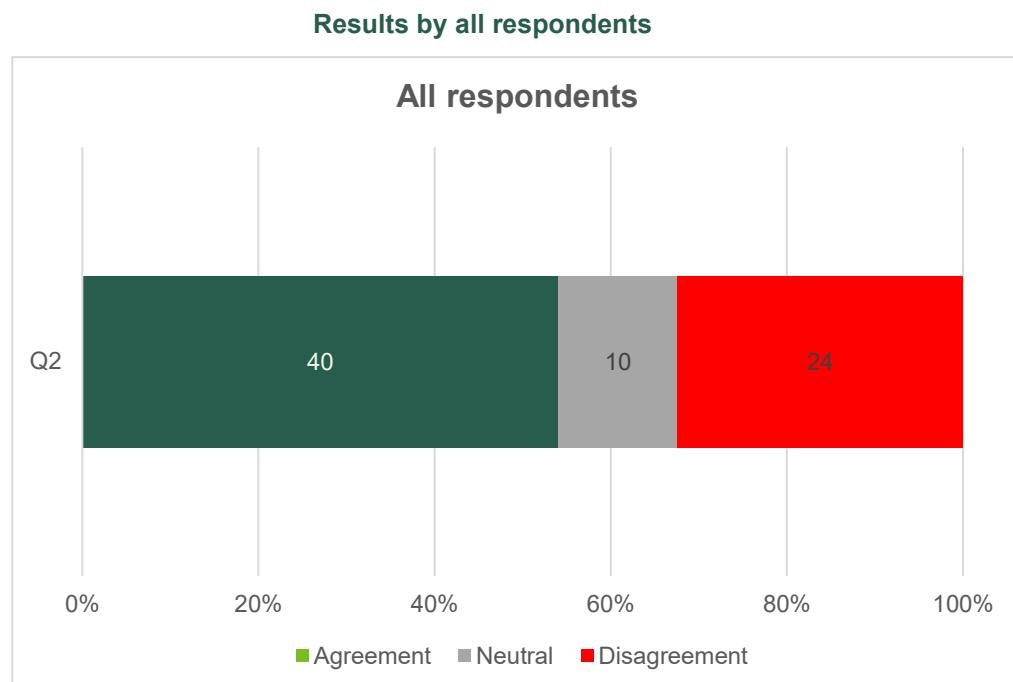
In total 74 out of 83 respondents answered this question.

An outline of the results shows that:

Agree: 40 respondents – 54 %

Neutral: 10 respondents – 14 %

Disagree: 24 respondents – 32 %



The overall distribution of responses shows that 54% of participants agreed with applying the proposed concept to areas converted prior to FSC's 1994 cut-off. The distribution by sub-chamber indicates that levels of agreement were highest among respondents from the Social and Economic chambers. In contrast, disagreement was most pronounced within the Environmental North chamber.

These perspectives are reflected in the qualitative feedback summarized below.

Option	Comments
Acknowledgement of restoration efforts before 1994	A few participants welcomed the idea of recognizing voluntary restoration of areas converted before 1994 as a way to encourage ecological recovery and responsible land stewardship, even when such areas fall outside current conversion rules.
Recognition as good practice	Stakeholders valued the proposal's potential to highlight and reward proactive restoration activities undertaken by organizations. They emphasized that voluntary restoration, even without formal credit, represents positive environmental and social contribution within the FSC system.
Opposition to Extending the Concept to Pre-1994 Conversions	Extending the mechanism to areas converted before FSC's 1994 cut-off was viewed as inconsistent with FSC's accountability framework. Allowing restoration to offset post-1994 conversion was considered contradictory to the Policy to Address Conversion and potentially creating a major loophole.
Risk of Undermining the 1994 Cut-off	The 1994 date is considered a cornerstone of FSC's credibility. Treating pre-1994 conversions as eligible for "restoration accounting" is perceived as weakening this boundary, blurring the distinction between historical and recent conversion, and opening the door to inconsistent application by certification bodies.
Inconsistency and Confusion with the Remedy Framework	Historical conversion is already addressed through the Remedy Framework. Introducing a separate mechanism for pre-1994 areas could create normative overlap, confusion, and a perception that older large-scale conversion could be forgiven under lighter conditions.
Limited Support for Recognizing Voluntary Restoration	The intention to encourage the recovery of older converted lands was acknowledged as positive, but such restoration should only be recognized as good practice, not as a compensatory measure or reduction of recorded conversion.

Table 3: Qualitative analysis Q2

Question 3. To what extent do you agree with the proposed conditions for when the status change of converted to restored areas should be considered to become effective?

Overview:

In total 71 out of 83 respondents answered this question.

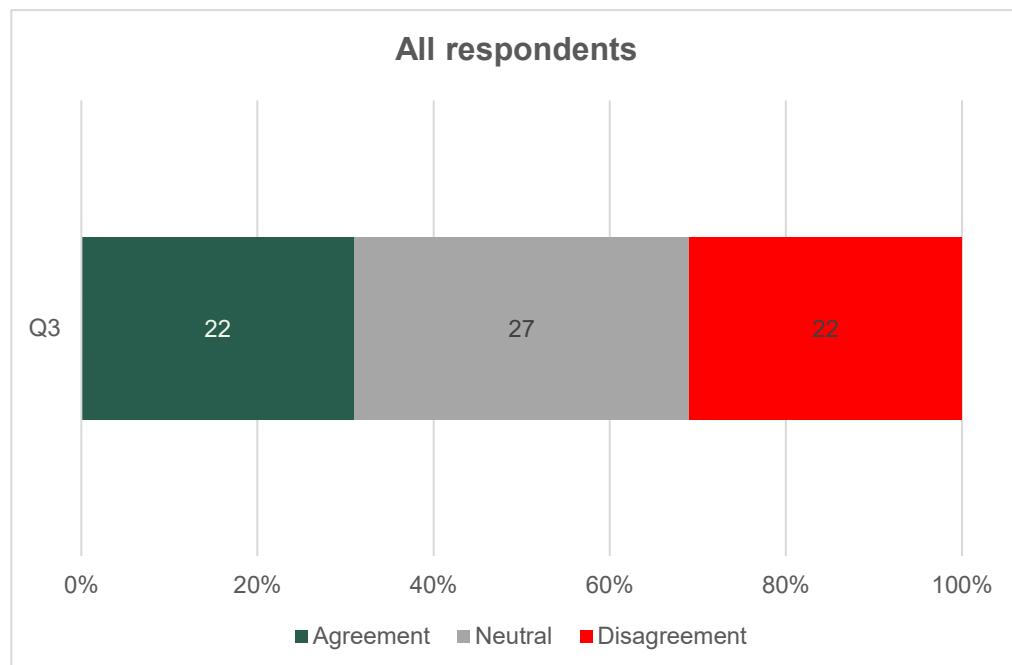
An outline of the results shows that:

Agree: 22 respondents – 31 %

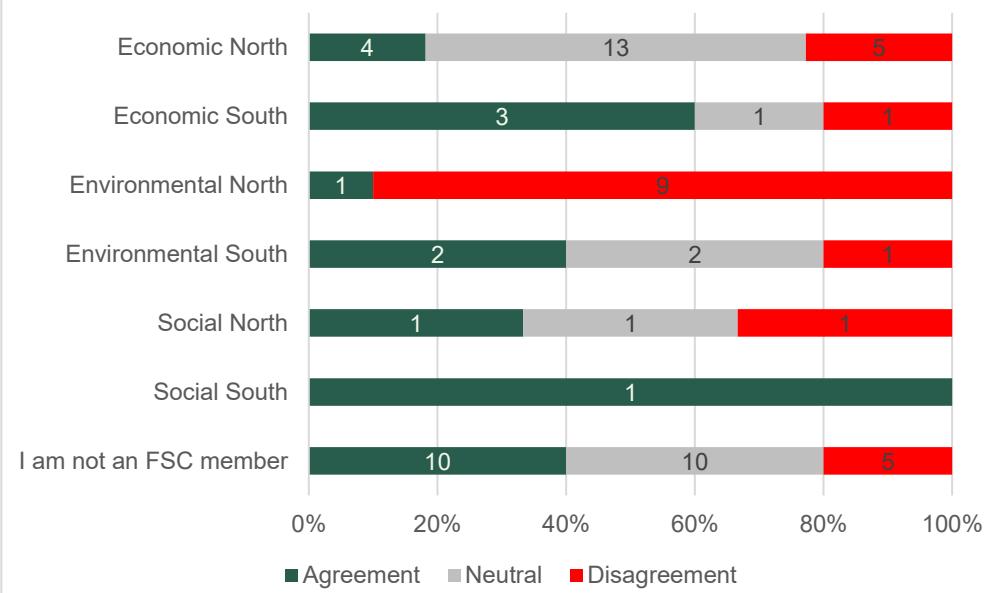
Neutral: 27 respondents – 38 %

Disagree: 22 respondents – 31 %

Results by all respondents



Totals, Non-members, and Members by sub-chamber



The overall results for Question 3 show that respondents were evenly divided, with 31% agreeing and 31% disagreeing, while 38% remained neutral.

The distribution by sub-chamber shows that most respondents from the Economic South and Social South expressed agreement, while disagreement was most pronounced among the Environmental North, where nearly all respondents opposed the proposed conditions. A considerable share of

participants, particularly from the Economic North, expressed neutrality, suggesting uncertainty or the need for further clarification of the proposed requirements.

Option	Comments
Recognition of Flexibility and Adaptive Approaches	Many stakeholders acknowledged the value of establishing clearer conditions for when a converted area can be considered restored. They appreciated the intent to promote accountability and ensure that restoration outcomes are evaluated under measurable ecological principles.
Support for adaptive approaches and regional flexibility	Several participants appreciated the proposed flexibility that allows restoration to reflect different ecological and regional contexts. They highlighted that adaptive approaches, such as enabling diverse yet ecologically sound forest compositions, can strengthen the resilience of restored areas.
Weakness and Ambiguity of Restoration Conditions	The condition that restoration is achieved when the “recovery potential to the equivalent forest is ecologically viable” was viewed as vague and difficult to verify. It focuses on theoretical potential rather than actual recovery and lacks measurable ecological indicators such as structure, composition, and function.
Lack of Additionality and Verification Requirements	The draft does not require restoration efforts to be additional to legal obligations or natural regeneration, nor does it establish clear verification procedures. Without these safeguards, the process could be misused to claim superficial or automatic compliance.
Practical and Auditing Challenges	The proposed wording was considered difficult to audit in practice. The requirement for “on-site assessment” was viewed as potentially too rigid and resource-intensive, while the absence of concrete benchmarks could lead to inconsistent interpretations across regions.
Limited Support for Flexibility and Adaptive Approaches	The intention to maintain flexibility to reflect ecological and regional contexts was acknowledged as positive. Allowing restoration to include alternative but ecologically justified forest compositions (particularly in areas affected by climate change) was seen as acceptable, provided this does not lower ecological standards or allow new conversion.

Table 4: Qualitative analysis Q3

Summary of actions taken to address feedback received

The following summary consolidates the key themes raised through the public consultation on the three guiding questions, highlighting both areas where stakeholders proposed improvements and where adjustments or clarifications have been introduced in response to the feedback on the draft Advice Note.

Option	Comments
1. Recognition of Restoration Efforts	Some stakeholders appreciated the proposal as a constructive step toward acknowledging and rewarding ongoing restoration efforts. They noted that allowing restored areas to reduce the conversion record encourages proactive forest recovery and reinforces positive outcomes within FSC's framework.
2. Flexibility and Practical Implementation	Some respondents welcomed the greater flexibility introduced in the draft, especially for older conversion areas or areas facing ecological changes. They highlighted that adaptive approaches could better account for site-specific realities while supporting long-term forest resilience.
3. Alignment with FSC Normative Framework	The draft was seen as inconsistent with the Policy to Address Conversion (PAC) and the Principles & Criteria (P&C). Allowing restored areas to be subtracted from the conversion record was seen as introducing a compensation mechanism that alters FSC's zero-conversion approach. Such revisions were considered to require a full policy process rather than an Advice Note.
4. Conversion Limits and Potential Loopholes	The proposed text allows areas "already planned and agreed upon" to exceed the 1,000 (one thousand) hectares, creating a potential loophole for ongoing or large-scale conversions. Combined with the option to subtract restored areas, this could enable rolling conversion cycles and undermine the intent of the very limited portion percentage of 5% and maximum hectarage of 1,000 hectares limit.
5. Restoration Requirements and Definitions	The concept of restoration based on "ecologically viable recovery potential" was considered weak and difficult to verify. Stakeholders called for measurable ecological benchmarks, inclusion of an additionality requirement, and clear differentiation between natural forest recovery and plantation establishment.
6. Consistency, Governance, and Linkages	Concerns were raised about the absence of references to the Remedy Framework and the procedural legitimacy of introducing these changes through an Advice Note rather than a policy or standard revision.
7. Credibility and System-wide Implications	Some respondents warned that ambiguity in the text could create uncertainty about FSC's zero-conversion commitment and risk reputational impacts. Using an Advice Note rather than a broader policy process was seen as a procedural shortcut that could weaken stakeholder confidence.

Table 5: Summary table of actions taken to address feedback received

Additional stakeholder input (FSC Germany)

FSC Germany submitted a formal statement expressing concern regarding the clause “unless already planned and agreed upon...” included in Clause 1.1 of the draft Advice Note FSC-ADV-20-007-23.

Option	Comments	P&P responses
Legal considerations and pre-agreed conversions (Clause 1.1)	According to the submission, this wording could create a potential loophole for continued or future conversion activities and might weaken FSC's alignment with the Policy to Address Conversion and external frameworks such as the EU Deforestation Regulation (EUDR).	This provision was already part of the existing Advice Note and was retained to avoid potential legal liability for pre-existing contractual obligations. Therefore, no changes were made to this clause, but the rationale will be communicated in the final version of the document.

Table 6: Additional stakeholder input



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