

Report

# PRINCIPLES, CRITERIA, AND INDICATORS REVISION

PCI Consultation Report: Conceptual Phase



**FORESTS<sup>TM</sup>  
FOR ALL  
FOREVER**

**Title:** Principles, Criteria, and Indicators Revision

**Dates:** **Publication date:** 8 May 2026

**Contact for comments:** **Email:** [forestmanagement@fsc.org](mailto:forestmanagement@fsc.org)

**Objective of document:** This report provides an overview of stakeholder feedback on the Conceptual Phase of Consultation on PCI Revision

**Confidential?**  Yes  No

**Intended audience**  Internal (FSC)  External

**Personal data included?**  Yes  No

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# INTRODUCTION

This report provides an overview and analysis of stakeholder feedback received during the conceptual phase consultation on the revision of the FSC Principles, Criteria, and International Generic Indicators (PCI). It describes the methodology used to analyse the results, summarises overall participation, and presents responses for each section of the consultation. The report also includes, as annexes, notes from the FSC General Assembly.

The Forest Stewardship Council (FSC) is undertaking a joint revision of the following normative documents (collectively referred to as Principles, Criteria and Indicators (PCI):

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

The PCI revision provides an important opportunity to strengthen the outcome orientation of the requirements and to streamline and improve their user orientation and usability for forest stewardship. It also aims to further strengthen social and environmental requirements, including those related to climate change and biodiversity conservation, among other topics. The methodology used to identify the topics included in this consultation was based on the analysis and findings of the Joint Review Report of FSC Principles and Criteria, Indicators, and other Forest Management Normative Documents, as well as a survey of FSC members and a series of discussion papers.

The objectives of the PCI revision align with the parallel revision process for the Requirements for the Development and Maintenance of FSC Country Requirements (Forest Stewardship Standards and FSC Risk Assessments), making the Forest Stewardship Standards (FSS) streamlined towards outcomes. Alignment between these processes is essential to ensure that outcome-oriented PCI requirements can be effectively contextualized and implemented at the country level.

As part of the conceptual phase, FSC has conducted a public consultation open to all interested stakeholders—the consultation aimed to gather stakeholder feedback on the key topics considered in this joint revision. In line with <FSC-PRO-01-001 V4-0 The Development and Revision of FSC Requirements>, the results will inform the Terms of Reference for this revision. Consultation materials are available on the web page dedicated to the PCI Revision.

The consultation was originally open on the FSC Consultation Platform from 1 October 2025 to 30 November 2025 and, following stakeholder requests, was extended until 31 December 2025. This report presents an analysis of stakeholder responses to the conceptual phase questions, including both quantitative and qualitative analyses.

In this report, a summary is provided for each section to allow quick reference, while detailed information is presented in the relevant question sections that follow.

The FSC team would like to thank all participants for their feedback and valuable input on the topics consulted on.

For further information on the revision process, please visit the dedicated web page. For comments or questions related to the revision process, please contact [forestmanagement@fsc.org](mailto:forestmanagement@fsc.org).

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## ABBREVIATIONS

<b>ASI</b>	Assurance Services International
<b>CB</b>	Certification Body
<b>CH</b>	Certificate Holder
<b>FAO</b>	Food and Agriculture Organization of the United Nations
<b>FPIC</b>	Free, Prior and Informed Consent
<b>FSC</b>	Forest Stewardship Council
<b>FSS</b>	Forest Stewardship Standard
<b>GMO</b>	Genetically Modified Organism
<b>HCV</b>	High Conservation Value
<b>HRDD</b>	Human Rights Due Diligence
<b>IFL</b>	Intact Forest Landscape
<b>IGI</b>	International Generic Indicators
<b>IPVI</b>	Indigenous Peoples in Voluntary Isolation
<b>ISO</b>	International Organization for Standardization
<b>IUFRO</b>	The International Union of Forest Research Organizations
<b>MU</b>	Management Unit
<b>NGO</b>	Non-Governmental Organization
<b>NTFP</b>	Non-timber Forest Product
<b>P&amp;C</b>	Principles and Criteria
<b>PCI</b>	Principles, Criteria, and Indicators
<b>SD</b>	Standard Developer
<b>SER</b>	Society for Ecological Restoration
<b>SIR</b>	Scale, Intensity, and Risk
<b>SLIMF</b>	Small and Low Intensity Managed Forests

## SUMMARY

This section summarizes the results of the public consultation conducted during the conceptual phase of the revision of the FSC Principles, Criteria and Indicators (PCI). The consultation was designed to align with the strategic directions before entering the drafting phase and to inform the Terms of Reference for the revision. A total of 186 stakeholders from 44 countries participated, including stakeholders from all FSC membership chambers and a broad range of stakeholder groups, with particularly strong participation from FSC members and certificate holders. Overall, the consultation results show a high degree of alignment across regions, stakeholder types, and membership chambers, providing a clear mandate to proceed with the proposed directions for the PCI revision. Where differences exist, they are largely related to implementation mechanics and proportionality rather than disagreement with the underlying objectives of the revision.

### Outcome orientation

Stakeholders broadly support the move toward a more outcome-oriented PCI, including formulating and designing the Principles and Criteria around intended outcomes. While agreement on the list of key intended outcomes of forest stewardship proposed in the consultation is slightly lower, the majority of respondents recognize the value of making outcomes explicit as a means to improve coherence and communication of FSC's expectations. Importantly, feedback indicates that support for outcome orientation is conditional on maintaining clarity, avoiding excessive complexity, and ensuring that requirements remain within the certificate holder's sphere of control. Stakeholders caution against shifting FSC certification toward performance claims or monitoring obligations that depend on external factors or long-term ecological responses and emphasize that outcome orientation should be used to simplify and strengthen the system rather than introduce new layers of measurement or subjectivity.

### Scope and application

There is strong support among stakeholders for updating the definitions of forests and non-forest vegetation to improve clarity on certification eligibility and to strengthen consistency in forest management certification. Regarding urban forests, there is moderate support for maintaining the current approach, under which certification remains limited to peri-urban forests and woodlands, as well as large urban parks and forests. However, the relatively high level of neutral responses, together with a notable share of disagreement, shows that this topic remains less settled and would benefit from further clarification and engagement. Comments suggest that many stakeholders want FSC to keep its main focus on forest ecosystems. At the same time, some also see potential in future opportunities in urban contexts, provided these do not weaken auditability or FSC's strategic focus.

### Strengthening social requirements

Consultation results on social requirements show overall positive support for strengthening gender equality and respecting Indigenous Peoples in Voluntary Isolation (IPVI), though with less uniform agreement than on environmental topics. For gender equality, respondents clearly favour a comprehensive, integrated approach that combines inclusive language and practical measures, rather than isolated or symbolic interventions. Regarding IPVI, support for incorporating requirements in the PCI is moderate, with a high proportion of neutral responses reflecting the geographically specific nature of the topic and limited direct experience in many regions. Across both topics, stakeholders consistently emphasize the need for proportionality, clarity of applicability, and flexibility for country-level adaptation, particularly to avoid undue burden on smallholders or in contexts where these topics are not relevant. Opposition is not directed at respecting IPVI; rather, it is primarily focused on concerns about indicator proliferation, duplication with

country or national legal frameworks, and the risk of including globally prescriptive rules for context-specific topics, rather than reflecting disagreements with the underlying social safeguards.

### **Climate change and biodiversity conservation**

Proposals to strengthen requirements on climate change, biodiversity conservation, and forest resilience received clear majority support, though at lower levels of agreement than for streamlining. Around two-thirds of respondents agree that the revised PCI should include explicit requirements on climate change adaptation and mitigation, achieve more measurable biodiversity outcomes, and make forest resilience more explicit. Support for these directions is broadly consistent across the Economic, Environmental, and Social chambers, while certificate holders express comparatively higher levels of caution. This caution relates primarily to feasibility, monitoring burden, and cost implications, rather than opposition to the underlying objectives. Feedback emphasizes the need for outcome-focused framing, flexibility across forest types and regions, reliance on science-based approaches, and avoidance of overly prescriptive or rigid requirements. Stakeholders also highlight that any increase in ambition should be accompanied by clear, auditable requirements that build on the existing IGI, rather than introducing parallel or duplicative systems.

### **User orientation and streamlining**

Across the consultation, there is strong support for streamlining the PCI by introducing a new structure that reduces redundancy, clarifies its organization, and improves alignment across FSC's normative framework. Respondents consistently support reducing complexity, clarifying the hierarchy and purpose of different normative elements, and improving coherence between global requirements and country implementation. The results indicate that stakeholders agree on the strategic direction for the PCI revision, and that remaining differences relate primarily to how the changes are implemented in practice. They also support retaining the IGI as the starting point for developing country adaptations, with many respondents viewing this as a critical step toward improving consistency, auditability, and user understanding. Key cross-cutting expectations include maintaining strong environmental and social safeguards, ensuring proportionality and auditability, preserving national flexibility within a clear global framework, and using outcome orientation as a means to enhance clarity and effectiveness rather than to expand obligations.

### **Outline**

The consultation results provide a robust and credible foundation for moving from the conceptual phase into the drafting phase of the PCI revision. They confirm broad stakeholder support for the proposed directions and identify clear design conditions to be addressed during drafting, particularly around clarity, feasibility, and ensuring the economic viability of forest management certification is maintained while safeguarding its integrity.

## METHODOLOGY

The methodology for developing the consultation questions and materials was based on The [Joint Review Report of FSC Principles and Criteria, Indicators, and other Forest Management Normative Documents](#), which serves as the basis for the current revision process and identifies areas requiring revisions or potential withdrawals. Based on these findings, a [survey](#) was subsequently launched among FSC members to gather input on the general aspects of the PCI from December 2024 to February 2025. The results provided direction to the Secretariat to commission the development of several discussion papers.

These papers presented recommendations on [climate change and biodiversity](#), a review of Principle 3 on Indigenous Peoples' rights, an assessment of the scope, applicability, and usability of the PCI, and options for introducing an outcome-oriented approach into the PCI.

The following key topics were subsequently identified and assessed for further analysis and consultation:

- 1) Social aspects, including strengthening gender and diversity, Indigenous Peoples' rights, workers' rights, and community relations.
- 2) Climate change and biodiversity, focusing on how to better integrate climate change mitigation and adaptation into the PCI and strengthen biodiversity conservation.
- 3) Scope and applicability, exploring the applicability of the scope of the PCI and ways to enhance clarity and user friendliness.
- 4) Outcome orientation, defining the intended outcomes of forest stewardship.

A series of [public webinars](#) was organized to discuss these topics. The feedback collected during these webinars informed the further development of the public consultation's content and questions. The consultation was conducted through the [FSC Consultation Platform](#) and made available in all three official FSC languages: English, Spanish, and French. Additionally, the Forest Management Community (FMC) and Network Partners (NP) have provided consolidated feedback for the consultation, which is included in the evaluation of the results.

This report presents the quantitative and qualitative results of the consultation and provides a detailed overview of the findings. The structure of the consultation and methodology used to analyse the results are described in the sections below.

### Stakeholder engagement

Stakeholder engagement during the conceptual phase was conducted primarily through consultation platform, supported by targeted outreach activities. To support understanding and encourage participation, FSC International organized four public webinars during the consultation period (14 October and 20 November 2025), with a total of 323 registered participants. These webinars presented consultation topics, explained the intent of the proposed directions, and shared the consultation link and supporting materials.

Additional engagement also occurred during activities at the FSC General Assembly (GA), allowing for further exchanges and clarification of the PCI revision. A summary of the relevant GA sessions is presented in the annexes of this report. Information on engagement activities, including materials developed for the webinars, is available on the [PCI Hub](#).

### Consultation questions

The consultation was developed based on the key topics. It included 33 questions: 24 multiple-choice (closed-ended) and 9 free-text questions (open-ended), providing stakeholders with the opportunity to offer

additional written feedback for each section. The close-ended questions mainly used a Likert-scale (e.g., strongly disagree – 1, to strongly agree – 5), while there were also some with binary options (e.g., Yes or No) or scaling (from 1 to 5). All questions were optional, so participants did not need to answer each one to move through the consultation.

## Data analysis

FSC International analysed the results. Responses submitted in other languages were translated into English. Quantitative analysis was applied to closed-ended questions, with results presented by stakeholder group. For open-ended questions, comments were reviewed and grouped by agreement/disagreement, and the results are summarized in tables that highlight the main feedback from participants. The analysis shows general support across stakeholder types; however, it is not fully representative of each group due to low participation in some cases.

## Stakeholder types

The following stakeholder types were available for participants for self-identification and selection on the FSC Consultation Platform (in alphabetical order): Academia/research organization, Assurance Services International (ASI), Certificate Holder (CH), Certification Body (CB), Consultant, FSC Network Partner, FSC International Staff, FSC Member, Forest owner, Governmental Organization, Indigenous Peoples' Representative, Industry Representative, ISEAL (a non-profit organization that sets global best practices for social and environmental standards) members, Non-Governmental Organization (NGO), Promotional License Holder, and Other. The responses reflect how stakeholders choose to identify themselves.

Self-identified categories are used for stakeholder types and FSC membership due to the absence of a membership verification system in the current consultation platform. Participants are required to create an account to take part in the consultation; however, the platform does not verify the creation of multiple accounts or affiliation with a particular organization.

Regarding the FSC Member category, the number of respondents selecting this category may not reflect the actual number of international FSC members listed, as individuals in other categories (e.g., certificate holders or certification bodies) may also be FSC members.

## Interpreting the results

The total number of responses received for each question varies. Accordingly, the percentages of selected options shown for each question are calculated based on the total number of responses to that specific question.

For remarks on whether the results are in 'agreement', 'neutral', or in 'disagreement' for quantitative results, 'agreement' refers to the total number/percentage of 'strongly agree' and 'agree' choices; 'neutral' refers to the total number/percentage of 'neutral' answers; and 'disagreement' refers to the total number/percentage of 'strongly disagree' and 'disagree' choices. For qualitative results, these are classified as defined below:

- 1) **Strong Support:** comments that clearly and unconditionally support the proposal as presented, without requesting changes or expressing reservations. These responses typically endorse the proposal's intent and approach as necessary and appropriate.
- 2) **Support, but with Conditions / Improvements requested:** comments that generally support the proposal but include conditions, caveats, or suggestions for improvement. These may involve requests for clarifications, additional safeguards, technical adjustments, or process-related recommendations.

- 3) **Neutral / Abstain / Unclear:** comments that do not express a clear stance for or against the proposal. This includes responses indicating no opinion, insufficient knowledge, or comments that are off-topic or focused on procedural aspects rather than the substance of the proposal.
- 4) **Opposition and presenting Alternative Proposal / Approach:** comments that oppose the proposal in its current form but offer constructive alternatives or modifications. These responses often suggest alternative frameworks, methodologies, or implementation strategies other than the proposed approach.
- 5) **Strong Opposition / Rejection:** comments that reject the proposal outright and/or call for discontinuing the discussion. These responses typically advocate maintaining the status quo or express fundamental disagreement with the proposal's intent or direction.

## OVERALL PARTICIPATION

This section provides an overview of consultation participation, with details for each question presented in the Responses section. A total of 186 participants took part in the consultation. The figure includes only those who answered at least one consultation question<sup>1</sup>.

### Regional Representation

The consultation attracted a diverse range of participants from across all regions, ensuring broad geographic representation. Figure 1 illustrates the regional distribution of respondents. Europe accounted for the largest share of responses (42%), followed by Latin America (22%) and Africa (15%).

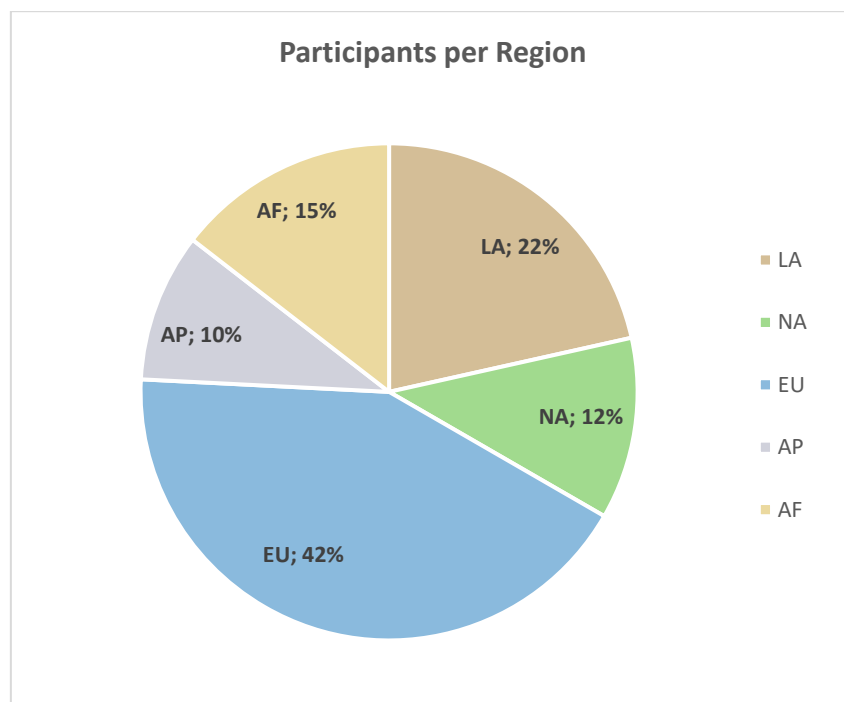
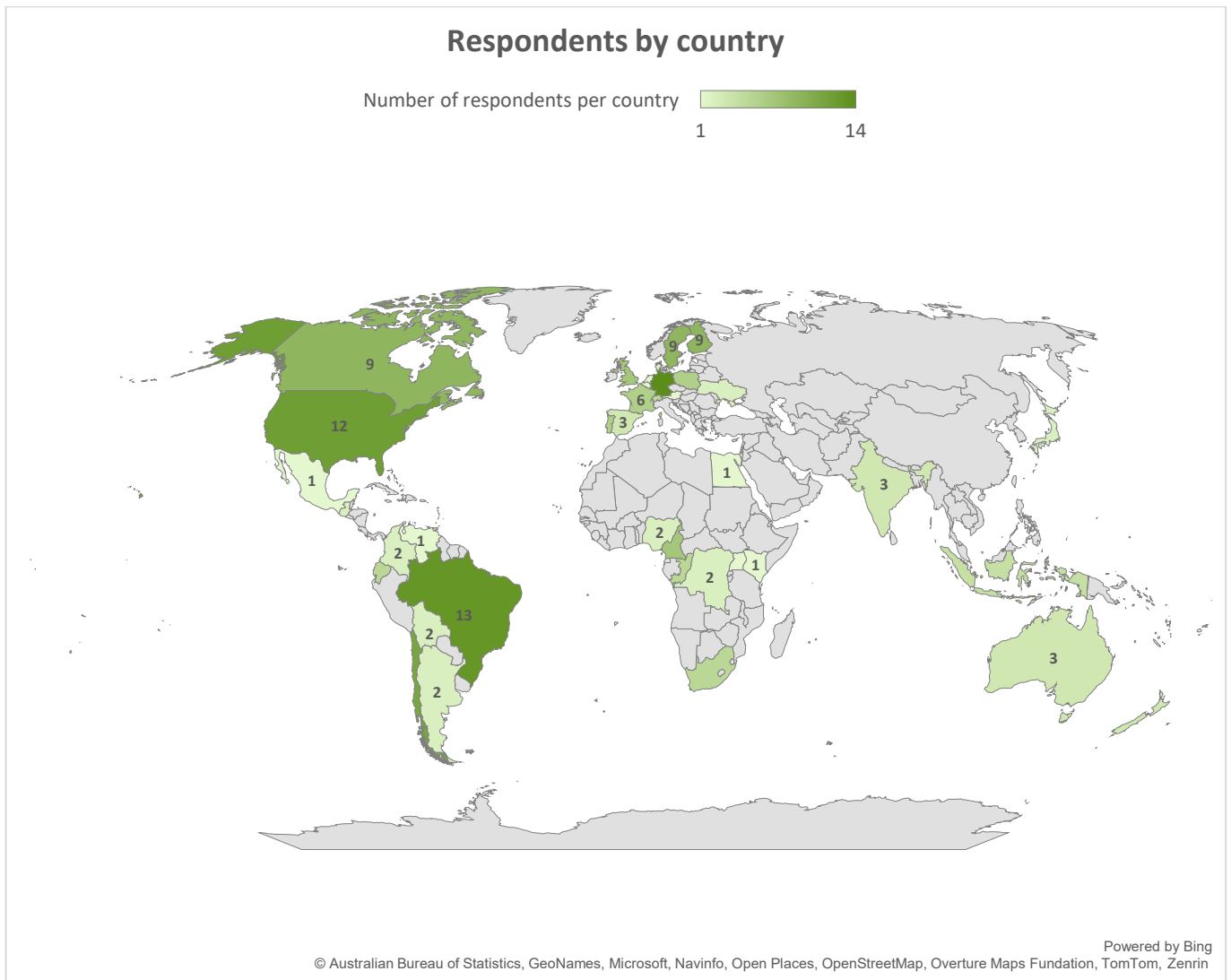


Figure 1. Breakdown of participants per region (LA: Latin America, NA: North America, EU: Europe, AP: Asia-Pacific, AF: Africa)

### Country Representation

Figure 2 illustrates the country-level distribution of respondents. Responses were received from 44 countries. Germany and Brazil had the highest number of participants at the country-level (13 respondents), and the United States (12 respondents).

<sup>1</sup> A total of 12 participants did not provide answers to the content sections but only on the initial questions on respondents profile.



*Figure 2. Number of respondents per country*

### Stakeholder Type

Respondents were asked to identify themselves by their respective background groups. Based on the responses, 13 stakeholder types (including ‘Other’) are identified – reflecting self-identification – who took part in the consultation, with FSC members representing the largest group (61 respondents), followed by certificate holders (52 respondents) (Figure 3).

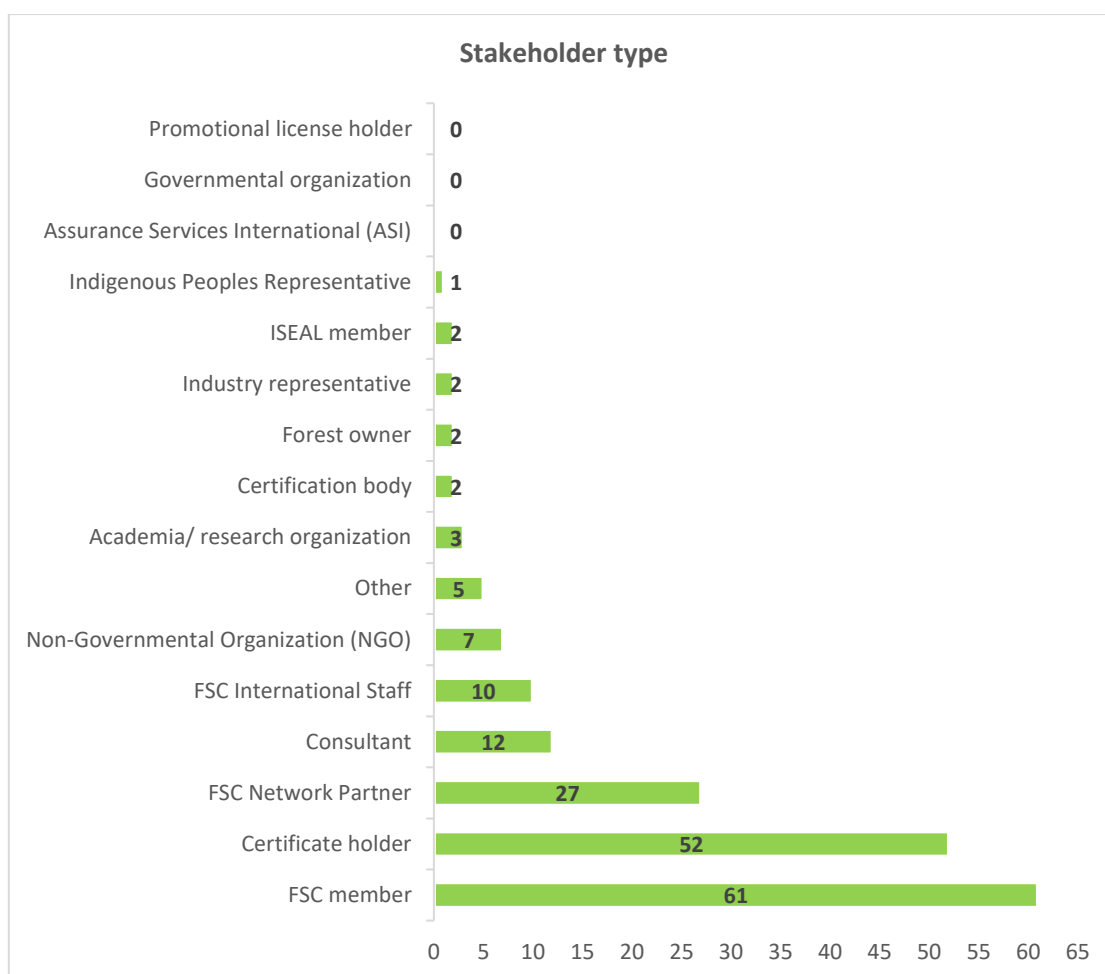


Figure 3. Participation levels by stakeholder types: number of respondents by stakeholder type

### FSC Membership Representation

Among the 61 respondents who self-identified as FSC members, the chamber distribution is as follows: Environmental South, 15 (24%); Environmental North, 11 (18%). Social South accounts for 3 respondents (5%), while Social North accounts for 5 respondents (8%). The Economic South and Economic North sub-chambers each account for 12 respondents (20% each). Additionally, 3 respondents (5%) did not complete the field to indicate a sub-chamber (Figure 4).

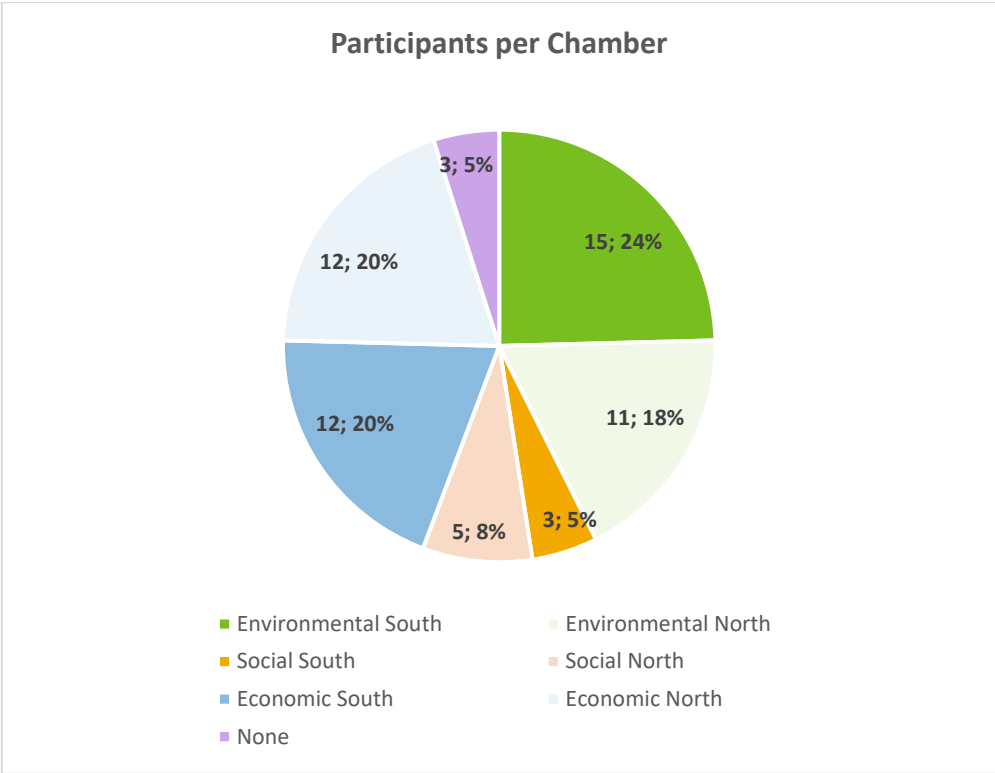


Figure 4. Breakdown of participation by FSC Membership Chambers (number of respondents; percentage)

# RESPONSES

Figure 5 presents the overall levels of agreement and disagreement for the consultation questions that used a Likert-scale and Yes/No response formats. For details on what is proposed for each question, please refer to the following sections. The figure provides an overall snapshot of the consultation results: percentages of responses are shown at the bottom of the chart. At the same time, the number of respondents for each question is indicated within the corresponding bars.

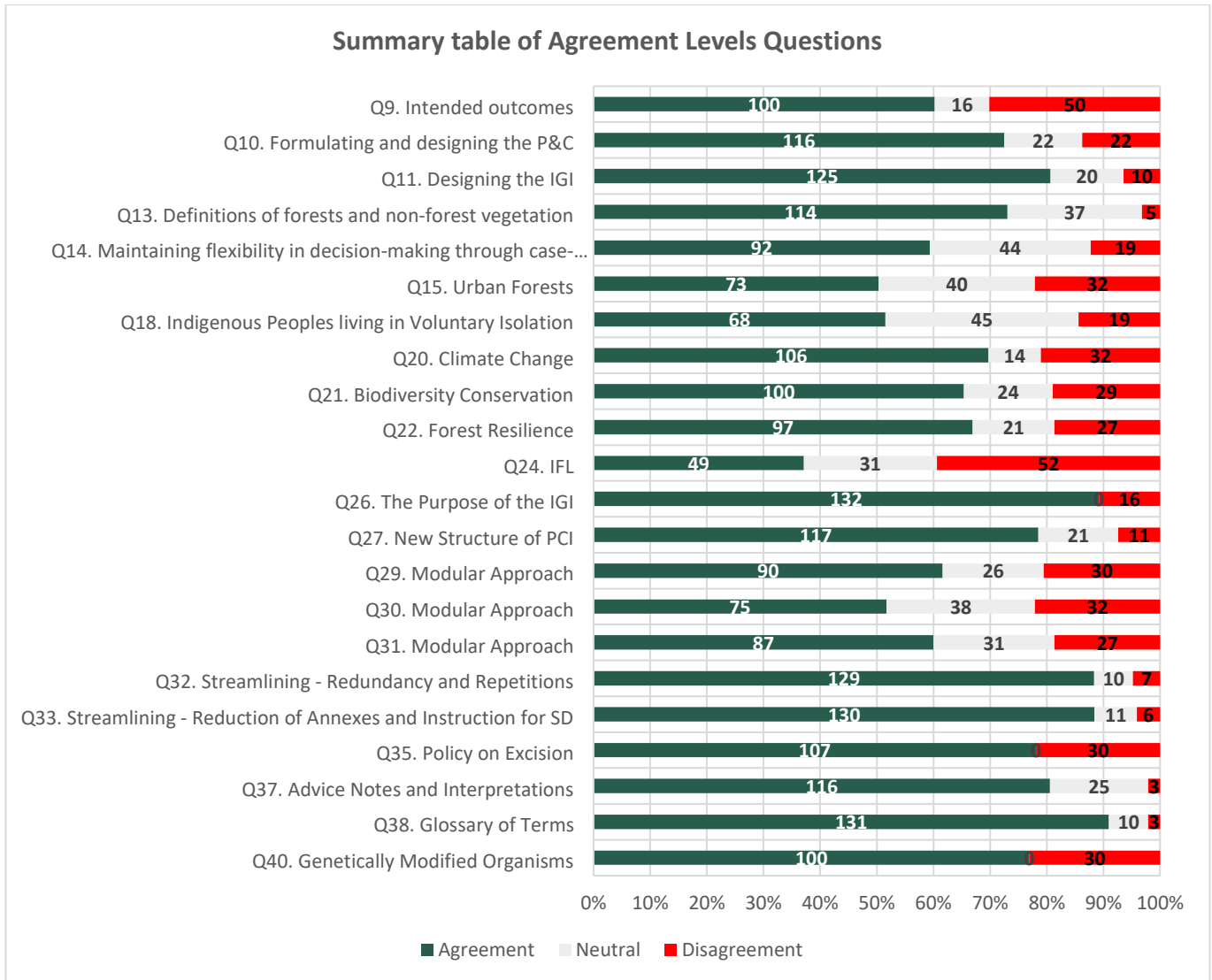


Figure 5. Overall agreement/disagreement for Likert-scale and Yes/No type questions included in the Consultation.

The results show broad support for the proposed directions in the PCI revision. The highest levels of agreement were observed on topics related to streamlining the requirements, including incorporating Advice Notes and Interpretations directly into the PCI, reducing redundancies and repetitions, and revising the glossary of terms. Strong support was also expressed for maintaining the International Generic Indicators (IGI) as the starting point for developing country adaptations, as well as for exploring a new structure for the PCI. Each of these topics achieved agreement levels of 80% or higher.

In contrast, the question of whether FSC should maintain the current threshold protection approach to Intact Forest Landscapes recorded the highest level of disagreement, with over 50% expressing disagreement. As detailed in Section 5, the disagreement can be explained as support for the passing of

Motion 45, “Moving beyond fixed thresholds to outcome-based conservation for Intact Forest Landscapes (IFLs)”.

## 1. Outcome Orientation

This section consulted stakeholders on introducing a more outcome-oriented design for the PCI, including defining global intended outcomes for forest stewardship, reformulating Principles and Criteria around intended outcomes, and clarifying the role of the IGI. Overall, the proposals received moderate to high support, with agreement outweighing disagreement across questions, although disagreement and neutral responses are notable, particularly regarding the proposed list of intended outcomes. Responses from stakeholder types and FSC membership sub-chambers show broadly aligned patterns, with slightly lower support in the Social North sub-chamber. Open feedback generally supports the proposed direction while emphasizing the need to preserve clarity, auditability, and safeguards.

### 1.1. Intended outcomes of forest stewardship

**Q9. To what extent do you agree with the list of main intended outcomes of forest stewardship proposed above? (1 – strongly disagree; 5 – strongly agree)**

#### Overview:

In total, 166 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 23 respondents – 14%

**Agree:** 77 respondents – 46%

**Neutral:** 16 respondents – 10%

**Disagree:** 32 respondents – 19%

**Strongly Disagree:** 16 respondents – 11%

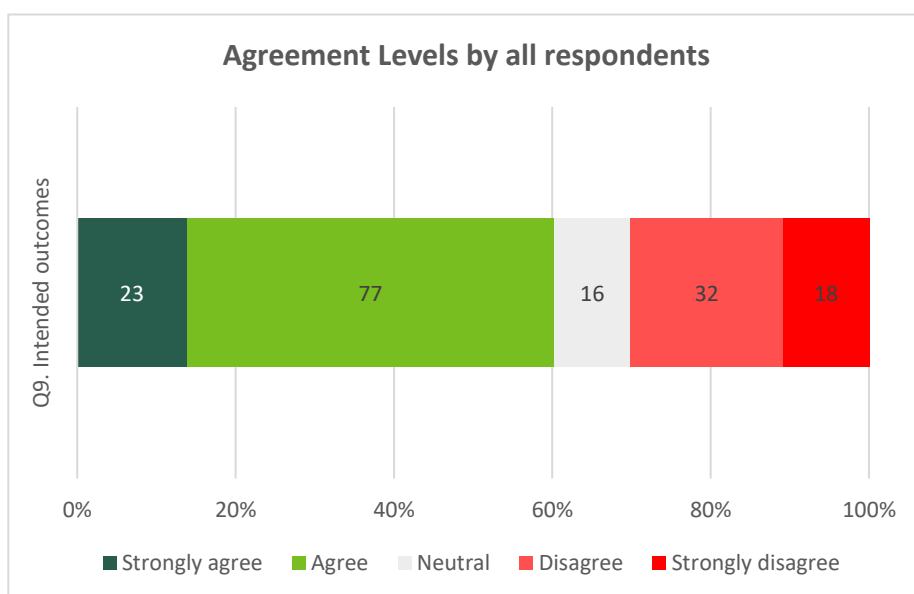


Figure 6. Agreement levels for Question 9 across all respondents

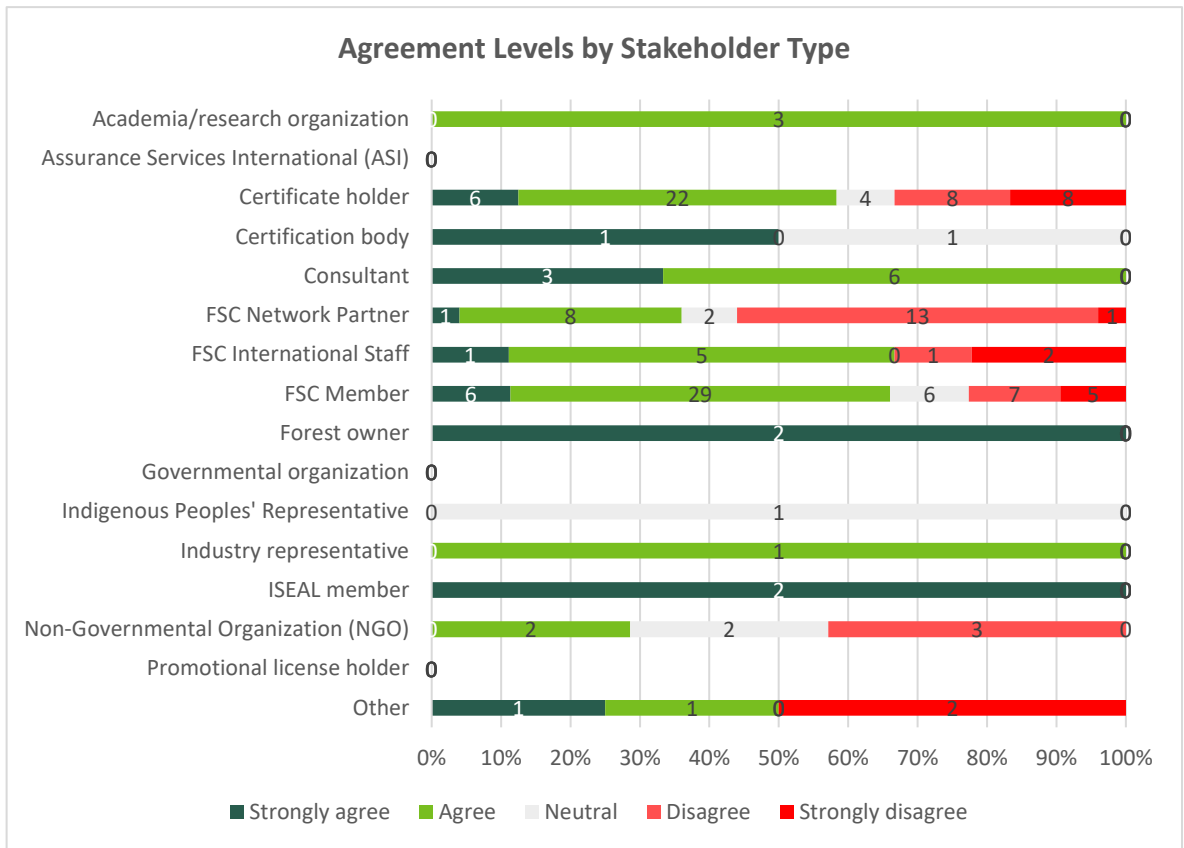


Figure 7. Agreement levels for Question 9 by stakeholder type

166 respondents answered this question. The proposed list of main intended outcomes of forest stewardship received considerable support, with 60% of respondents agreeing or strongly agreeing. Overall, multiple stakeholders recognize the value of using the PCI revision as an opportunity to define the main intended outcomes that forest stewardship should deliver globally. The major disagreement was from FSC Network Partners (54%).

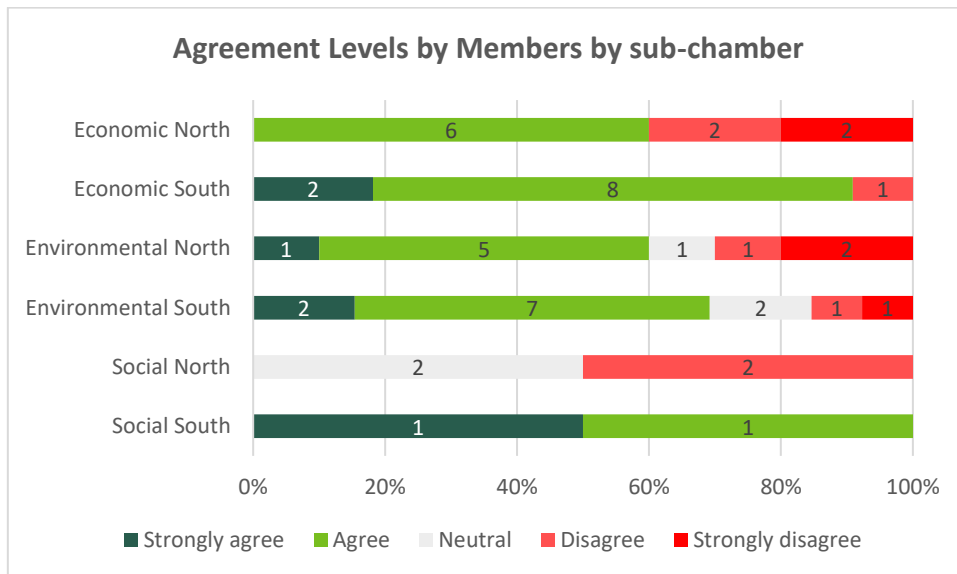


Figure 8. Agreement levels for Question 9 by sub-chamber

The question was answered by 50 FSC members across all six sub-chambers. While overall support varies between sub-chambers, higher levels of disagreement are observed in the Social North sub-chamber, where 50% of respondents disagreed.

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

**Q10. To what extent do you agree with formulating and designing the principles and criteria around intended outcomes? (1 – strongly disagree; 5 – strongly agree)**

**Overview:**

In total, 160 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 31 respondents – 19%

**Agree:** 85 respondents – 53%

**Neutral:** 22 respondents – 14%

**Disagree:** 17 respondents – 11%

**Strongly Disagree:** 5 respondents – 3%

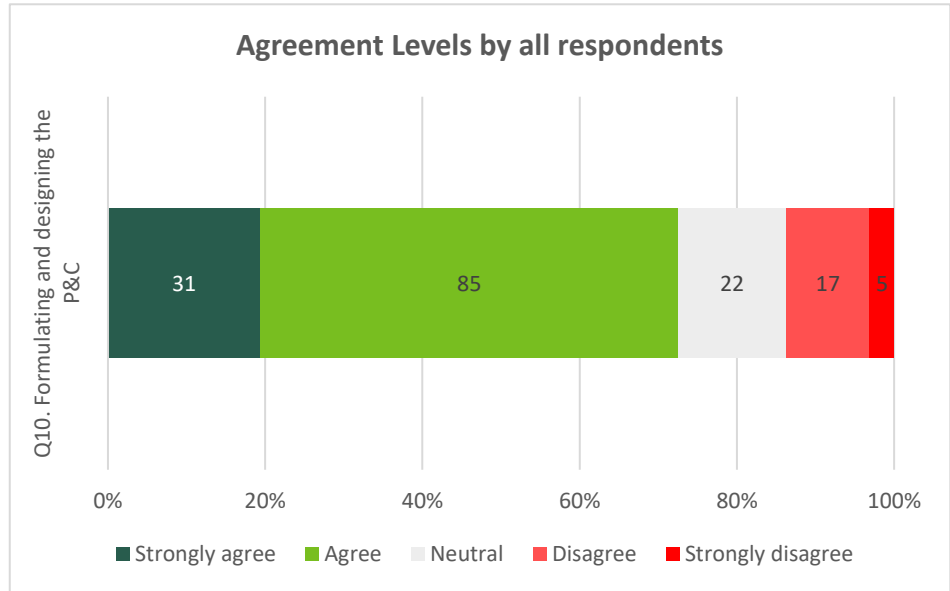


Figure 9. Agreement levels for Question 10 across all respondents

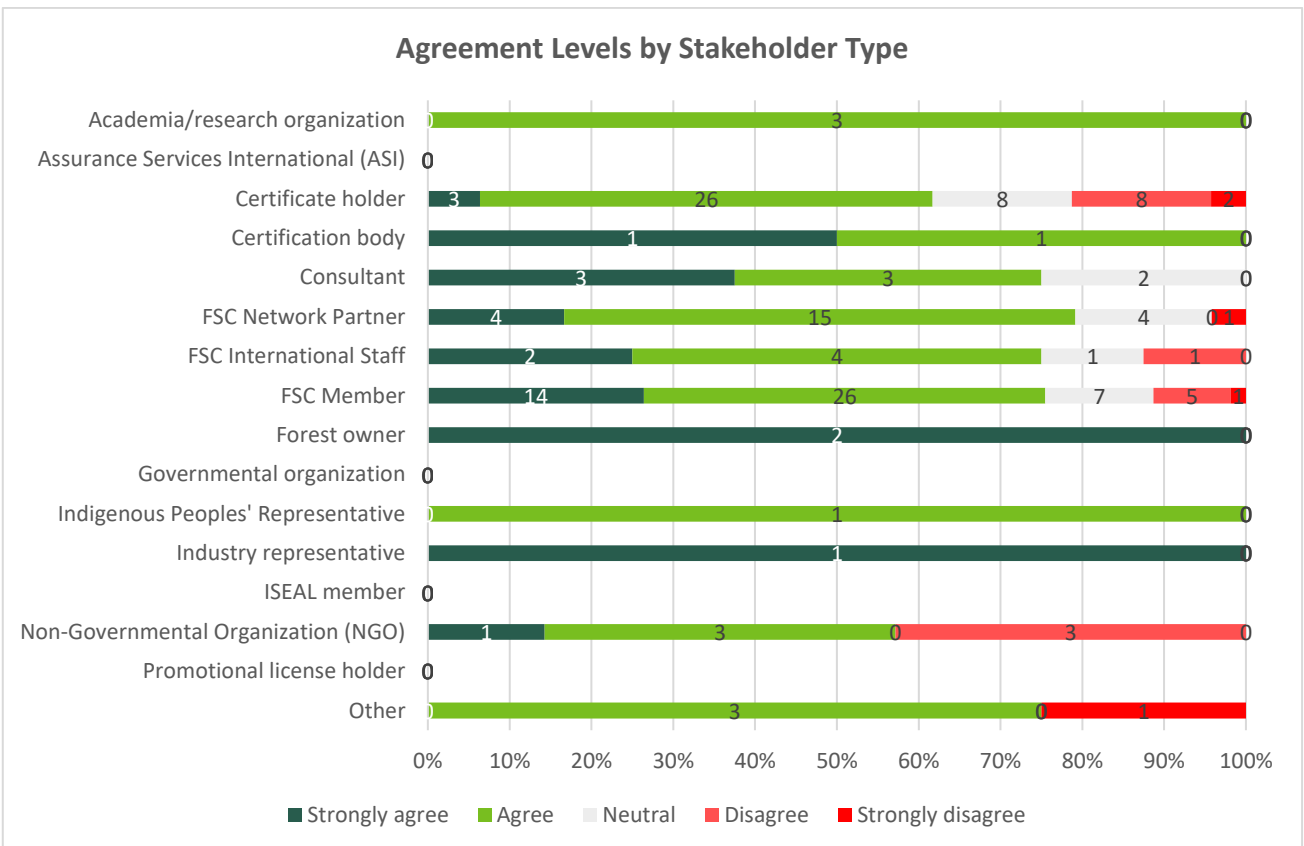


Figure 10. Agreement levels for Question 10 by stakeholder type

The question was answered by 160 respondents. The proposal to make the PCI outcome oriented, with principles and criteria specifically formulated and designed around intended outcomes, received strong support from multiple stakeholders: 73% of respondents agreed or strongly agreed with the proposal. Overall, certificate holders and FSC members recognize the importance of formulating the principles and

criteria around intended outcomes by supporting this proposal. The highest level of disagreement was among NGOs (43%).

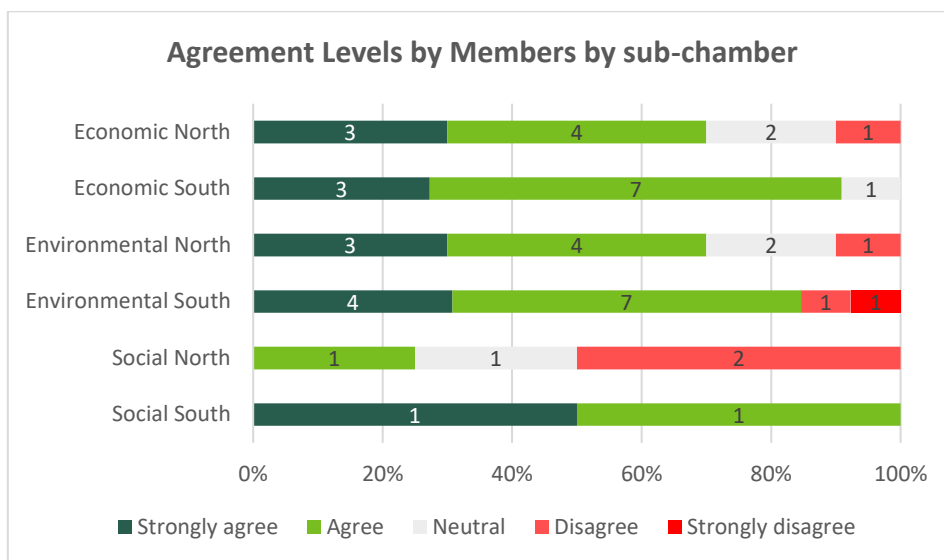


Figure 11. Agreement levels for Question 10 by sub-chamber

The question was answered by 50 FSC members across all six sub-chambers. While the overall level of support varies between sub-chambers, higher levels of disagreement are observed in the Social North sub-chamber, where 50% of respondents disagreed or strongly disagreed.

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

**Q11. To what extent do you agree that the IGI should be clear, verifiable requirements (binary), while being drafted to specify forest management activities that contribute to the relevant intermediate intended outcome? (1 – strongly disagree; 5 – strongly agree)**

#### Overview:

In total, 155 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 47 respondents – 30%

**Agree:** 78 respondents – 50%

**Neutral:** 20 respondents – 13%

**Disagree:** 5 respondents – 3%

**Strongly Disagree:** 5 respondents – 3%

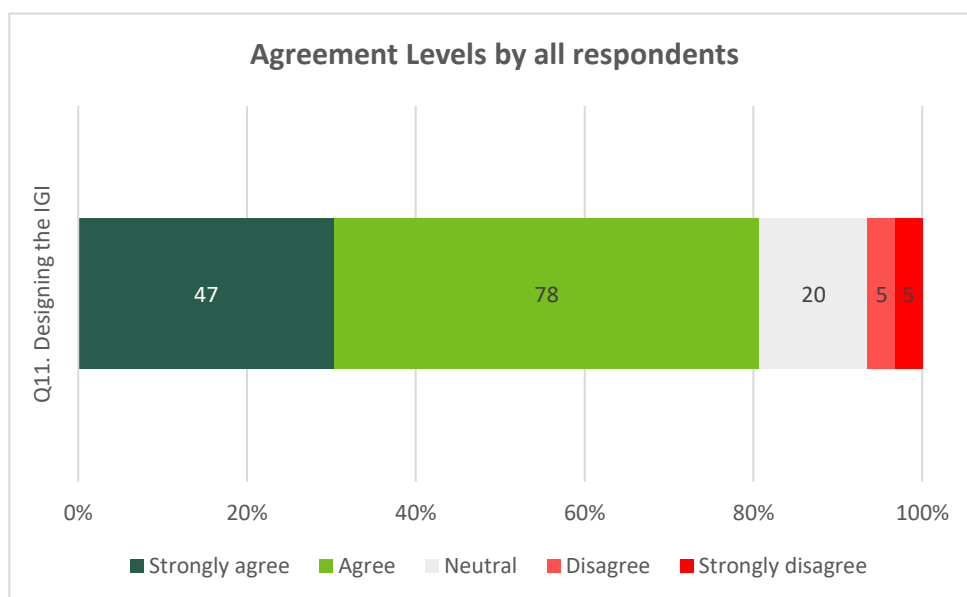


Figure 12. Agreement levels for Question 11 across all respondents

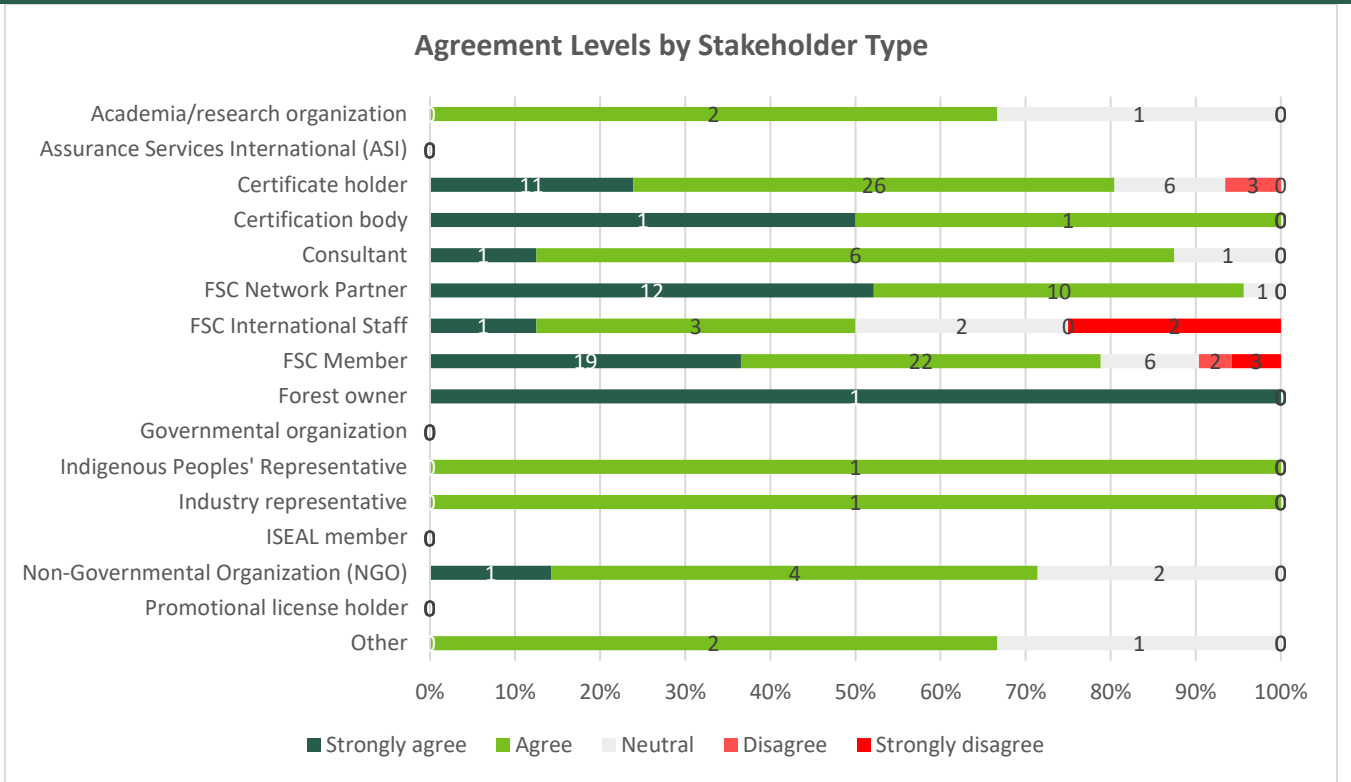


Figure 13. Agreement levels for Question 11 by stakeholder type

The question was answered by 155 respondents. The proposal to formulate the International Generic Indicators (IGI) as forest management activities that contribute to the intermediate intended outcomes (criteria) received strong support from multiple stakeholders. Of the 155 respondents, 80% agreed or strongly agreed with the proposal presented for the formulation of the IGI. These results indicate that certificate holders, certification bodies, and FSC members support the proposal to formulate IGI, considering their utility for auditing and contribution to the intermediate intended outcomes (criteria). The highest level of disagreement was among FSC International Staff (33%).

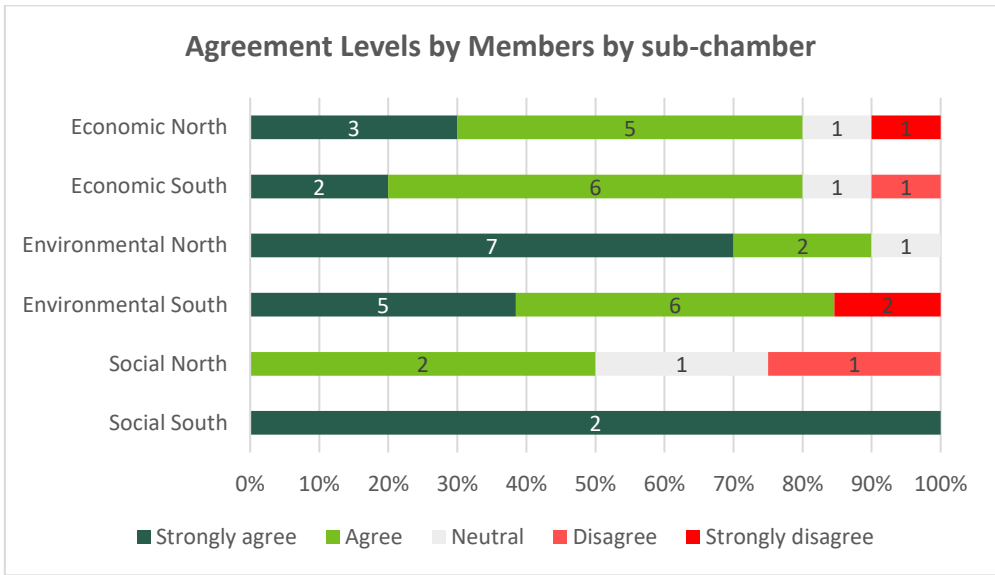


Figure 14. Agreement levels for Question 11 by sub-chamber

The question was answered by 49 FSC members across all six sub-chambers. Overall support is high across most sub-chambers (above 80%), except for the Social North sub-chamber, which shows lower support (50%).

#### 1.4. Open feedback on Outcome Orientation

##### **Q12. Do you have any additional comments, suggestions or feedback regarding this section on an outcome-oriented approach for structuring the PCI?**

A total of 88 open feedback comments were received on this section. Overall, respondents broadly support the proposal to make the PCI outcome-oriented, but most seek clarity, feasibility, and safeguards to avoid unintended complexity. Supporters emphasize the need for a binary IGI linked to outcomes, flexibility for local adaptation, and wording that stays auditable and within the certificate holder's (CH) control. Concerns center on costs, monitoring burden, and risk of weakening safeguards (e.g., High Conservation Values-HCVs, biodiversity, climate). Opposition is less about intent and more about mechanics, on how to preserve clarity, avoid over-promising, and maintain strong prescriptions where needed.

Below is a summary of key feedback from participants, grouped into five categories according to the degree of their support or opposition to the proposal.

<b>Categories of Comments</b>	<b>Summary of Comments</b>
<b>Strong support</b>	A few respondents support framing the PCI around intended outcomes and keeping the IGI binary (yes or no conformance) while making their causal link to outcomes explicit; they appreciate clearer examples and simpler wording. Some ask only for minor term clarifications (e.g., safeguarded). The approach can improve understanding and audits if outcome wording stays clear and field-auditable.
<b>Support, but with conditions / improvements requested</b>	Many respondents supported the proposals with the following condition/improvements: (1) keeping binary IGI but avoiding rigidity; recognizing that record-keeping may indirectly improve outcomes; not requiring certificate holders to prove both activity and measured outcome where external factors dominate; ensuring local adaptation of IGI remains possible; (2) refining wording (e.g., 'safeguarded'), ensuring outcomes are within a certificate holder's sphere of control, and combining/clarifying ecosystem outcomes (e.g., outcomes on native ecosystem structure and composition; native ecosystem functional processes) to reduce complexity; (3) they asked for clear guidance, examples and limits to the number of criteria/indicators, and cautioned against excessive monitoring complexity and subjectivity.
<b>Neutral / abstain / unclear</b>	Very few respondents were neutral or abstained. These respondents did not take a clear position and often provided brief remarks, including questions seeking clarification on how the approach would work in practice.
<b>Opposition with alternative proposal / approach</b>	One third of the open feedback comments opposed the proposal and provided the following comments: (1) the nine outcomes omit or weaken core areas (e.g., HCVs, climate/biodiversity); they question the split between structure and function (6 & 7), and worry about plantations or narrowly defined 'native ecosystems'; they propose combining items or adding explicit outcomes for biodiversity/climate/HCVs; (2) several respondents argue that dismantling Principle 9 – currently specific to HCVs – and redistributing HCV elements across other principles could weaken safeguards and complicate auditing; therefore, they call for either retaining a dedicated HCV principle or requiring explicit HCV mapping and documentation; (3) concern was expressed that outcome orientation shifts FSC toward performance claims beyond CH control,

Categories of Comments	Summary of Comments
<b>Strong opposition or rejection</b>	<p>creating costly monitoring and auditor inconsistency. Some propose keeping the PCI as requirements and adding separate outcome indicators.</p> <p>A few respondents rejected the outcome-oriented reframing as unclear or biased, arguing that the current P&amp;C already implies outcomes; they recommend applying outcome logic only at the indicator level and keeping the P&amp;C as is.</p>

*Table 1. Summary of qualitative feedback on Outcome Orientation*

## 2. Scope of Application

This section addresses the scope of application of the PCI, including definitions of vegetation types and the approach to urban forest certification. Updating vegetation type definitions received high levels of support, with strong agreement across stakeholder types and FSC membership sub-chambers. In contrast, proposals related to urban forests received mixed responses, with substantial neutrality and disagreement visible in results from both stakeholder types and FSC sub-chambers, particularly among Economic and Environmental North respondents. Open feedback highlights concern about clarity, boundaries, and consistent application across contexts.

### 2.1 Vegetation types

**Q13. To what extent do you agree that updating the current definitions of forests and non-forest vegetation is necessary to proactively inform users about eligibility for the scope of certification? (1 – strongly disagree; 5 – strongly agree)**

#### Overview:

In total, 156 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 39 respondents – 25%

**Agree:** 75 respondents – 48%

**Neutral:** 37 respondents – 24%

**Disagree:** 3 respondents – 2%

**Strongly Disagree:** 2 respondents – 1%

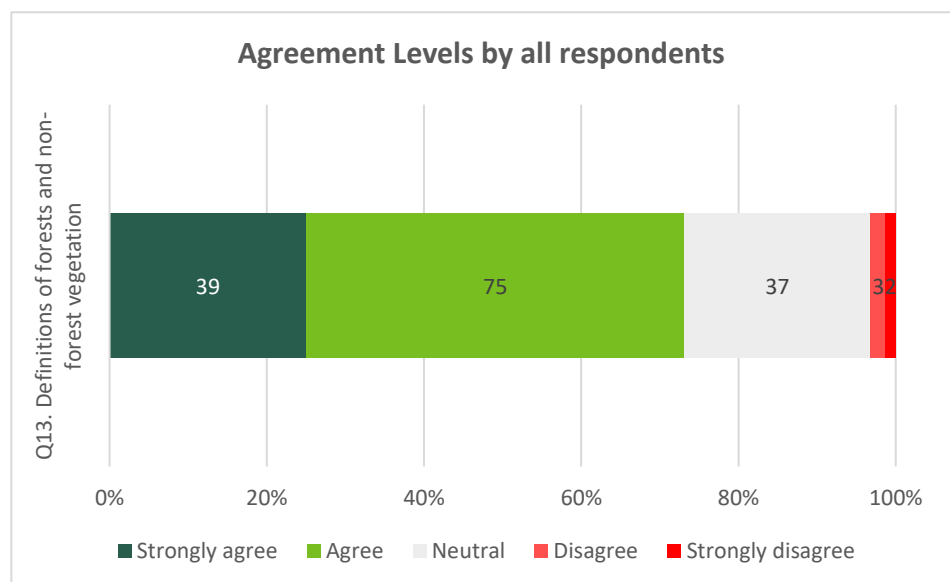


Figure 15. Agreement levels for Question 13 across all respondents

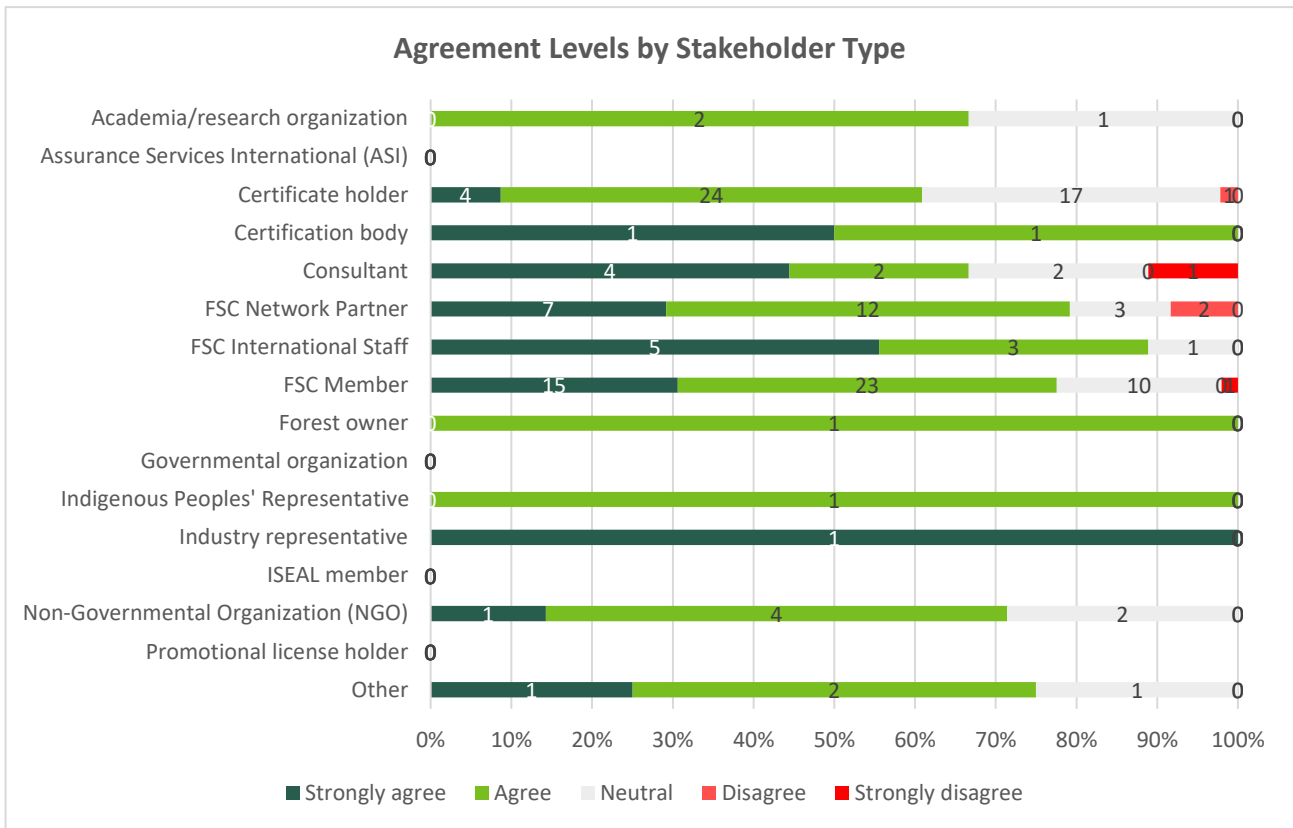


Figure 16. Agreement levels for Question 13 by stakeholder type

The question was answered by 156 respondents. The proposal to update the current definitions of forest and non-forest vegetation, with the aim of proactively informing users about eligibility for the scope of certification, received strong stakeholder support. Overall, 73% of respondents agreed or strongly agreed with the proposal, 24% expressed a neutral position, and only 3% disagreed or strongly disagreed.

Overall, the strong consensus indicates that stakeholders recognize the need for clearer definitions to improve predictability regarding certification eligibility.

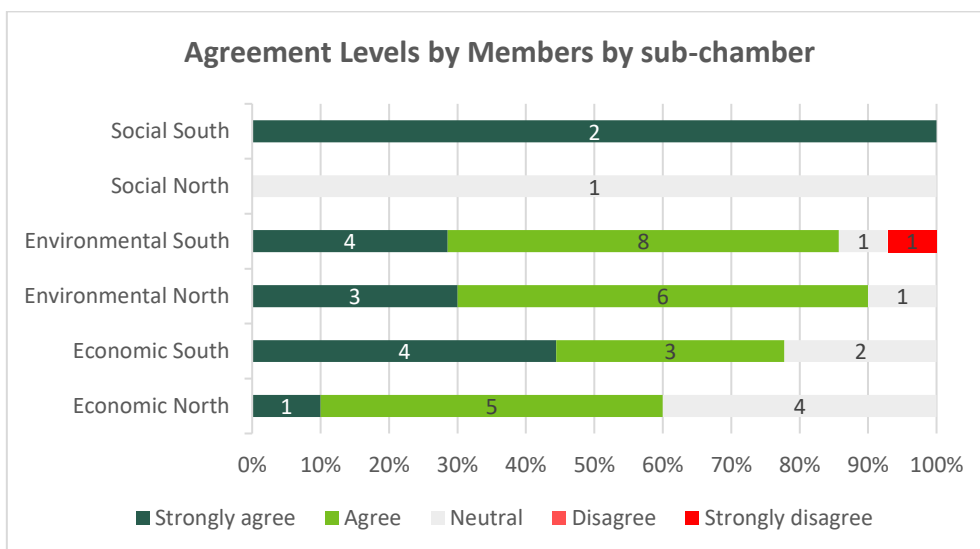


Figure 17. Agreement levels for Question 13 by sub-chamber

The question was answered by 46 FSC members across all six sub-chambers. Overall, support is high across most sub-chambers (above 60%), with limited disagreement and some variation in neutrality between sub-chambers.

**Q14. To what extent do you agree with the current normative approach of maintaining flexibility in decision making through case-by-case assessment? (1 – strongly disagree; 5 – strongly agree)**

**Overview:**

In total, 155 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 21 respondents – 14%

**Agree:** 71 respondents – 46%

**Neutral:** 44 respondents – 28%

**Disagree:** 13 respondents – 8%

**Strongly Disagree:** 6 respondents – 4%

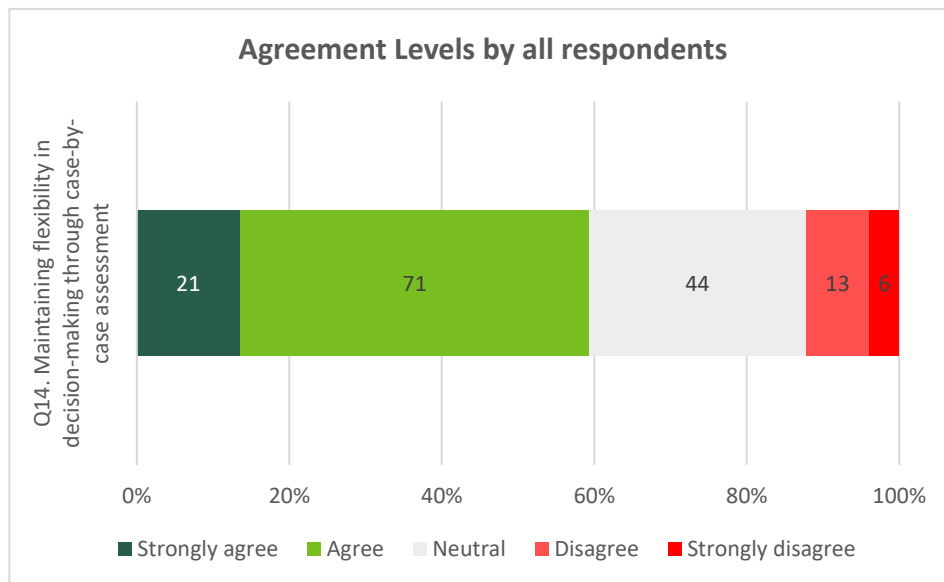


Figure 18. Agreement levels for Question 14 across all respondents

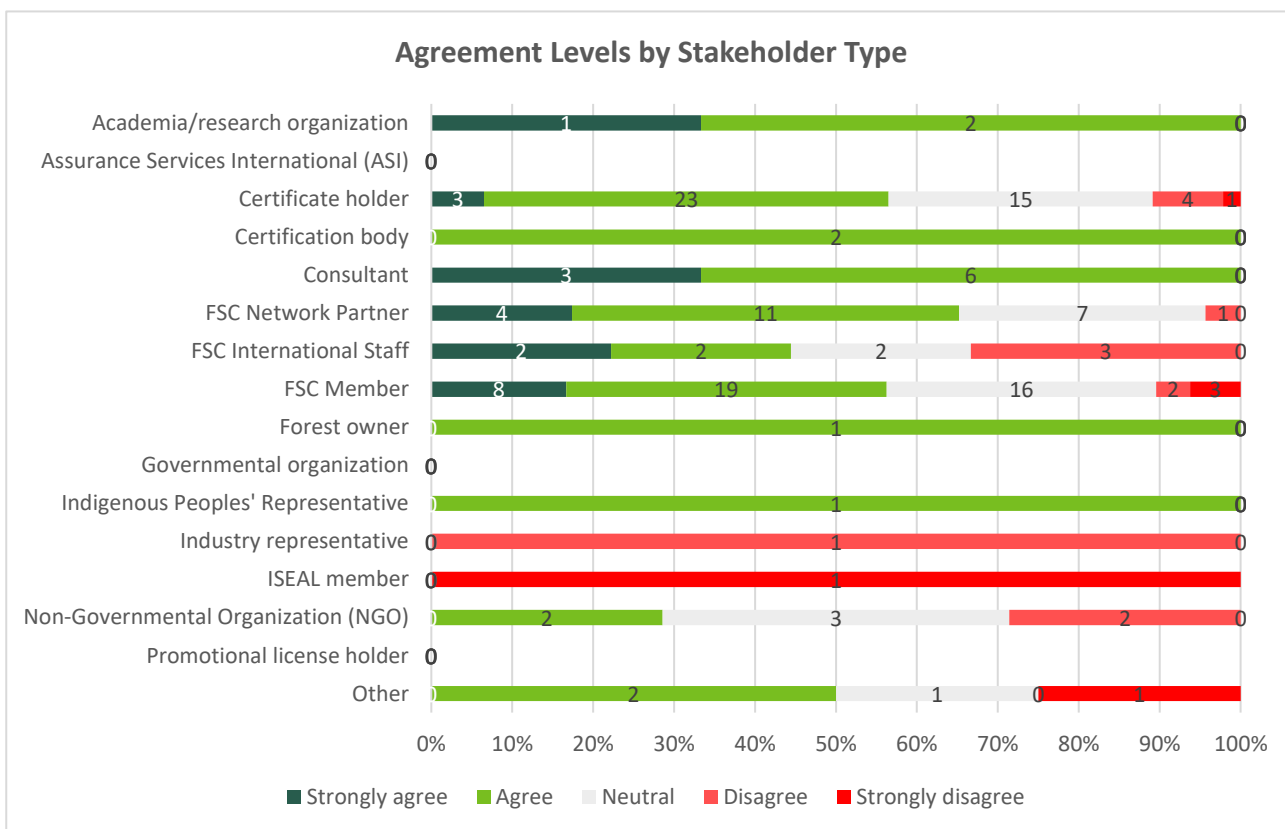


Figure 19. Agreement levels for Question 14 by stakeholder type

The question was answered by 155 respondents. The current normative approach of determining, on a case-by-case basis, whether specific vegetation types are eligible for FSC certification received moderate

support with 60% agreeing or strongly agreeing, though 28% remained neutral and 12% disagreed or strongly disagreed. Major disagreements came from the industry representative and the ISEAL member (100% – single respondents each), while disagreement was low for certificate holders (11%) and FSC members (11%). Overall, the data reflect general support for the current approach, with considerable neutrality by specific stakeholder groups.

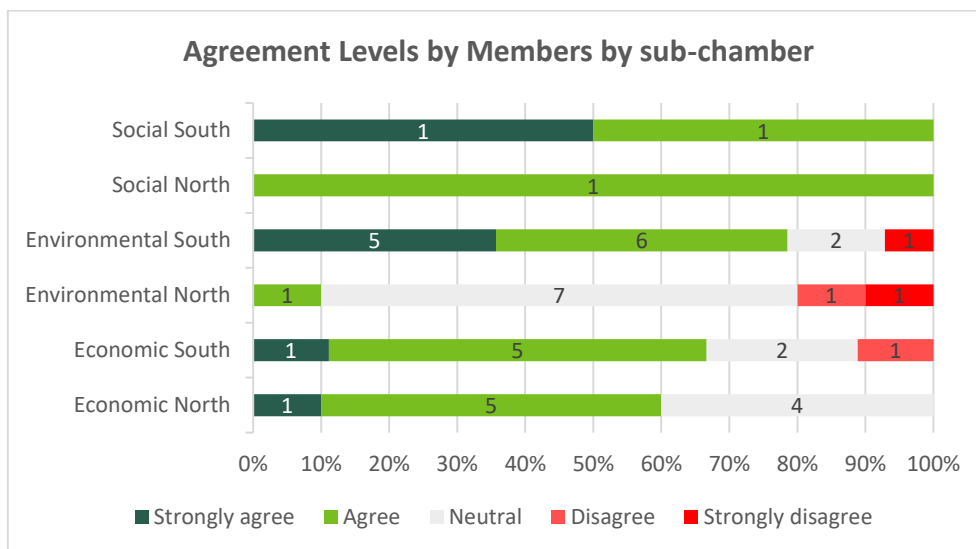


Figure 20. Agreement levels for Question 14 by sub-chamber

The question was answered by 46 FSC members across all six sub-chambers. Overall support exceeds 60% in most sub-chambers; however, the Environmental North sub-chamber shows notably lower agreement levels (around 10%), with the majority of responses being neutral.

## 2.2 Urban Forests

**Q15. To what extent do you agree with the current normative approach of maintaining certification limited to (a) Peri-urban forests and (b) Large city parks? (1 – strongly disagree; 5 – strongly agree)**

### Overview:

In total, 145 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 27 respondents – 19%

**Agree:** 46 respondents – 32%

**Neutral:** 40 respondents – 28%

**Disagree:** 20 respondents – 14%

**Strongly Disagree:** 12 respondents – 8%

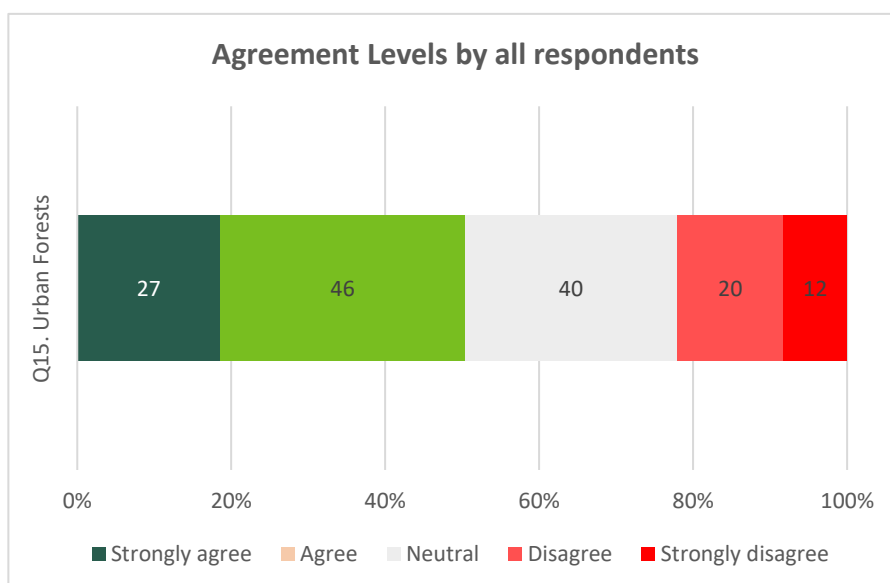


Figure 21. Agreement levels for Question 15 across all respondents

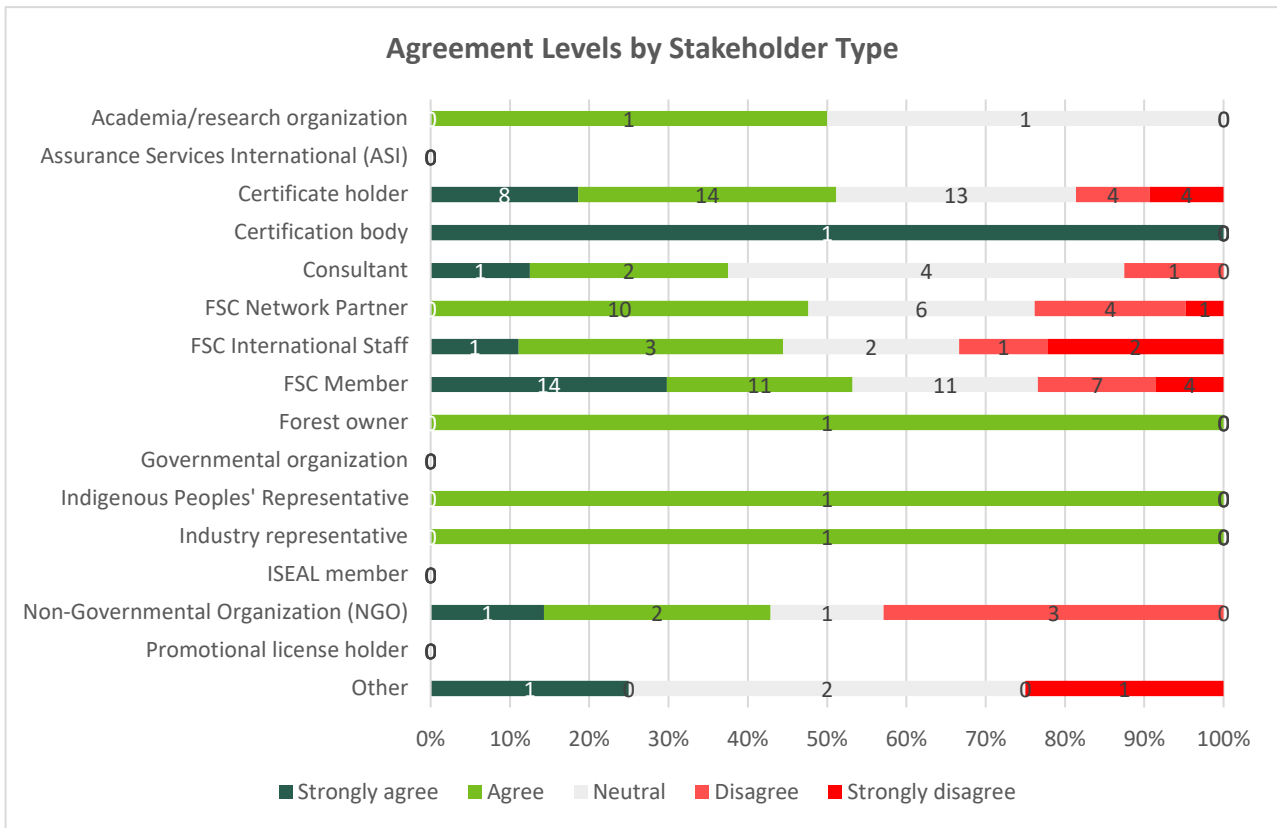


Figure 22. Agreement levels for Question 15 by stakeholder type

The question was answered by 145 respondents with 51% in general agreement. On the other hand, 28% were neutral, and 22% disagreed or strongly disagreed. The highest level of disagreement was shown by NGOs (43%). Overall, while a majority leans toward agreement, the relatively high levels of neutrality and disagreement suggest that further clarification and engagement may be needed to address concerns and build a broader consensus.

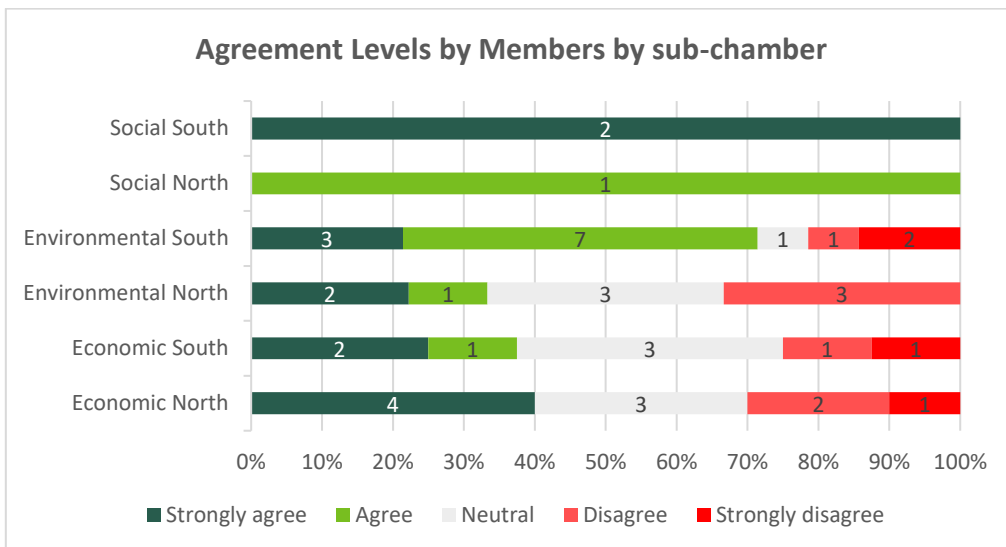


Figure 23. Agreement levels for Question 15 by sub-chamber

The question was answered by 44 FSC members across all six sub-chambers. Responses show mixed levels of support across sub-chambers, with higher agreement in the Social sub-chambers (100%) and Environmental South sub-chamber (>70%), while agreement is lower in the Economic sub-chambers and the Environmental North sub-chamber (<40%).

## 2.3 Open feedback on the Scope of Application

### Q16. Do you have any additional comments, suggestions or feedback regarding the section on Scope of Application of the PCI?

A total of 78 respondents provided open feedback on this section. On vegetation types, most comments supported updating the definitions of forests and non-forest vegetation to improve clarity on certification eligibility. At the same time, many comments stressed the need to avoid opening certification to very small, highly fragmented, or clearly agricultural systems without clear justification and safeguards. On urban forests, many respondents supported keeping the current approach under which FSC certification is limited to peri-urban forests and large urban parks, gardens, and other isolated urban green spaces, mainly because of concerns about FSC's mission, credibility, and auditability. Some respondents supported the current limitation but were open to future, carefully designed pilot approaches in urban contexts if strict safeguards and clear eligibility rules are in place. In contrast, neutral and opposing comments pointed to possible social and environmental benefits of broader urban certification and called for further discussion.

Below is a summary of key feedback from participants, grouped into five categories according to the degree of their support or opposition to the proposal.

Categories of Comments	Summary of Comments
<b>Strong support</b>	Few stakeholders expressed strong support for updating the current definitions of forest and non-forest vegetation types to ensure clarity, consistency, and integrity, and for explicitly distinguishing forests, plantations, and non-forest vegetation and reducing reliance on advice notes, while aligning with contemporary ecological science and land-use realities, including climate change adaptation. They also supported retaining case-by-case assessment where it demonstrably improves fit to the local context and remains transparent and evidence-based. Regarding urban forests, these respondents supported maintaining the current eligibility limitation to peri-urban forests and large urban parks, in order to keep FSC's focus on forest ecosystems and avoid credibility risks linked to certifying individual trees or very small urban green spaces.
<b>Support, but with conditions / improvements requested</b>	Many respondents supported definition updates on the condition that FSC references widely recognized frameworks, prevents short-rotation monocultures from being presented as 'forests', and considers whether separate normative pathways for plantations and natural forests are warranted. Support for case-by-case flexibility was coupled with requests for clear parameters, public justification, and guardrails, and for pairing decisions with modular readiness (e.g., for agroforestry and urban contexts) to preserve core coherence. Regarding the scope of urban forest certification, some stakeholders were open to future innovation via pilots, provided it does not take attention or resources away from core priorities, and provided requirements remain simple, with clear verifiers and practical auditability.
<b>Neutral / abstain / unclear</b>	Some neutral and ambivalent comments recognized the value of flexibility but highlighted risks of inconsistency, subjectivity, and reduced legal certainty if decisions are not bounded by clear guardrails and scientific principles. On potential scope changes in urban contexts, these respondents primarily asked for more information and assurance that any evolution would not take the focus or resources away from FSC's core priorities.

Categories of Comments	Summary of Comments
<b>Opposition with alternative proposal / approach</b>	A considerable number of opposing views argued that updating definitions could add complexity and therefore preferred simpler solutions while resolving confusion between agricultural crops and plantations. They opposed maintaining a broad case-by-case approach, warning it could become a ‘carte blanche’ that undermines predictability, and instead called for fixed, objective eligibility criteria that define acceptable types upfront. For urban forests, opponents proposed an alternative model that broadens eligibility to small parks, street tree networks, and other treed sites for ecosystem-services outcomes, such as connectivity, climate and biodiversity, suggesting a tailored urban framework focused on resilience and biodiversity rather than timber production.
<b>Strong opposition or rejection</b>	A few respondents rejected the current limits outright and demanded immediate certification of urban trees and small parks to address biodiversity, social equity, and climate resilience (including micro-forest initiatives).

*Table 2. Summary of qualitative feedback on Scope of Application*

### 3. Social Requirements

This section consulted on social requirements, including proposals related to gender equality and Indigenous Peoples in Voluntary Isolation (IPVI). Overall, the proposals received positive but not uniformly high support, with agreement outweighing disagreement across questions, while neutral responses remain notable for the proposal on IPVI. Patterns observed across stakeholder types and FSC membership sub-chambers are broadly consistent, indicating no major differences in views. Open feedback supports maintaining strong social safeguards, while noting the importance of proportionality, clarity, and effective implementation.

#### 3.1 Gender equality

**Q17. How should FSC strengthen the integration of gender equality in the revision of the PCI? (Select one or more options)**

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

**Overview:**

In total, 142 out of 186 respondents answered this question by selecting one or more than one option:

- Option 1:** 37 respondents – 19%
- Option 2:** 21 respondents – 11%
- Option 3:** 46 respondents – 24%
- Option 4:** 23 respondents – 12%
- Option 5:** 52 respondents – 27%
- None of the above:** 14 respondents – 7%

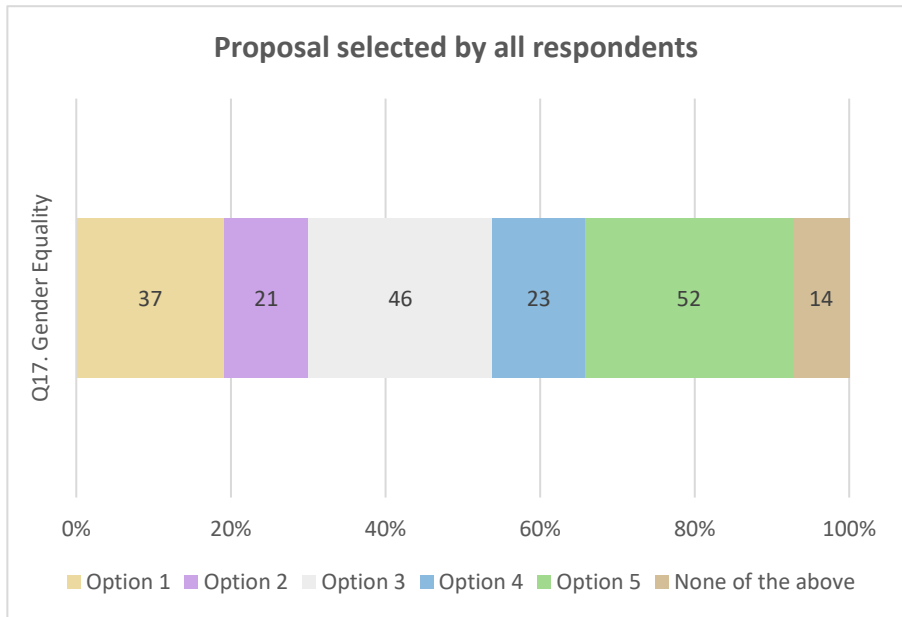


Figure 24. Agreement levels for Question 17 across all respondents

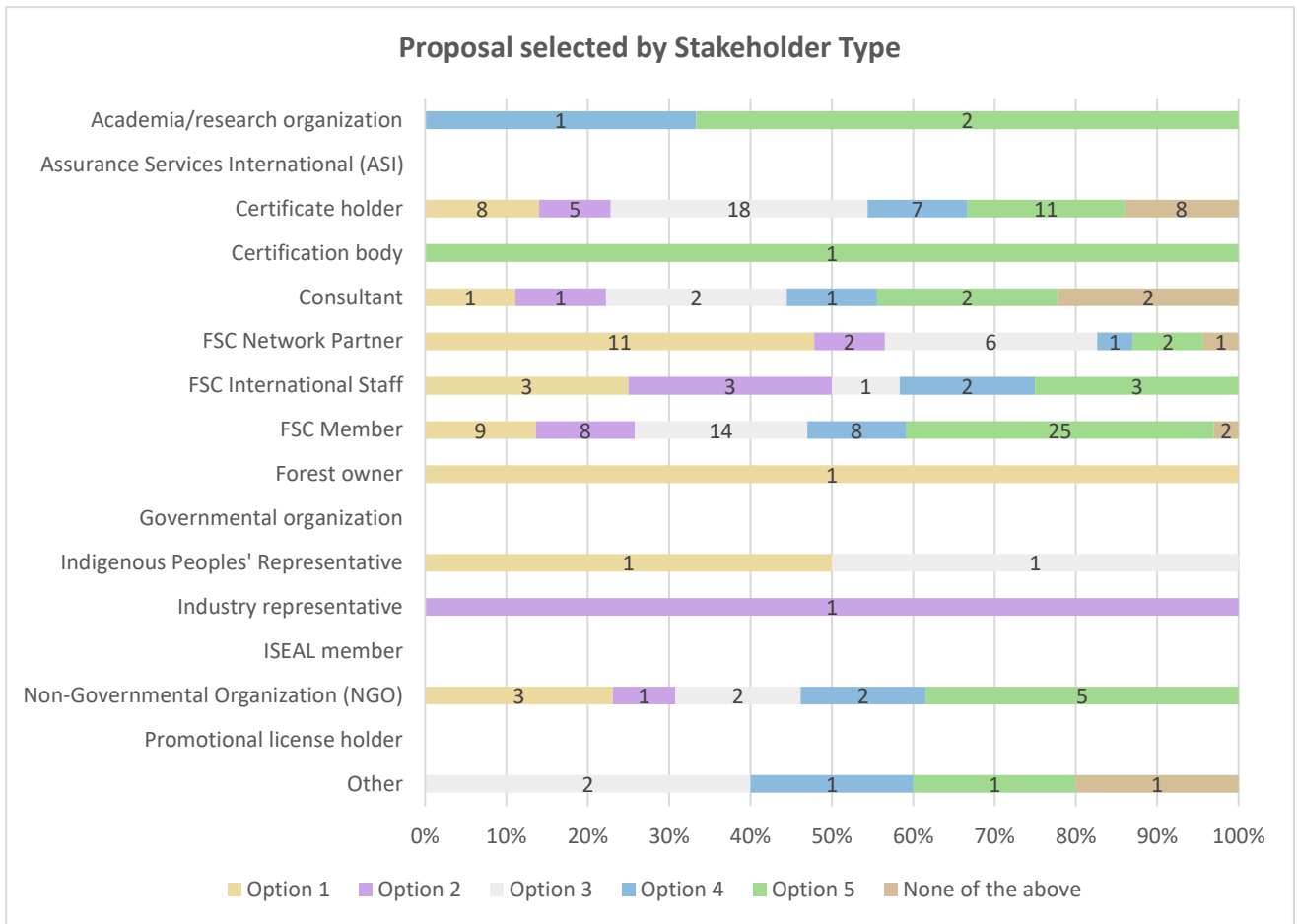


Figure 25. Agreement levels for Question 17 by stakeholder type

The question was answered by 142 respondents, with 10 respondents selecting more than one option and 45 respondents selecting only one option. The results show that participants clearly favour a comprehensive approach to strengthening gender equality in the PCI revision. Option 5 received the highest support (27%), followed by Option 3 (24%). Support for the other choices is more moderate, ranging between 11 and 20%, while None of the above is around 7%. Overall, the pattern suggests that specific strategies (inclusive language, systemic frameworks, active steps, and benefit sharing) are each seen as relevant, but respondents most often prefer an integrated, multi-strategy package rather than a single isolated intervention.

At the stakeholder level, the same trend holds. FSC members (25 selections) and NGOs (5 selections) show a strong preference for Option 5, and certificate holders show comparatively stronger support for Option 3 (18 selections) alongside Option 5 (11 selections), indicating interest in practical, action-oriented inclusion measures. Across the smaller stakeholder groups, responses are more mixed, but where selections are present, Option 5 remains the most consistently chosen option.

**Consolidated summary of discussion points from FSC General Assembly side event on integrating gender equality (Annex 2):**

1. Gender and cultural sensitivity: avoid generalizations; recognize cultural norms and promote intercultural dialogue and gender-balanced representation.
2. Respect for Indigenous women's life plans: promote inclusion, career opportunities, and respect for Indigenous women's aspirations.
3. Regional diversity matters: cultural differences across Latin America affect representation and inclusion strategies.

- Pragmatic implementation: balance complexity and cost with integrity; provide clearer guidance on handling specific issues.

### 3.2 Indigenous Peoples living in voluntary isolation

**Q18. To what extent do you agree that FSC should incorporate requirements of the Indigenous Peoples living in voluntary isolation within the PCI? (1 – strongly disagree; 5 – strongly agree)**

**Overview:**

In total, 132 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 39 respondents – 30%

**Agree:** 29 respondents – 22%

**Neutral:** 45 respondents – 34%

**Disagree:** 6 respondents – 5%

**Strongly Disagree:** 13 respondents – 10%

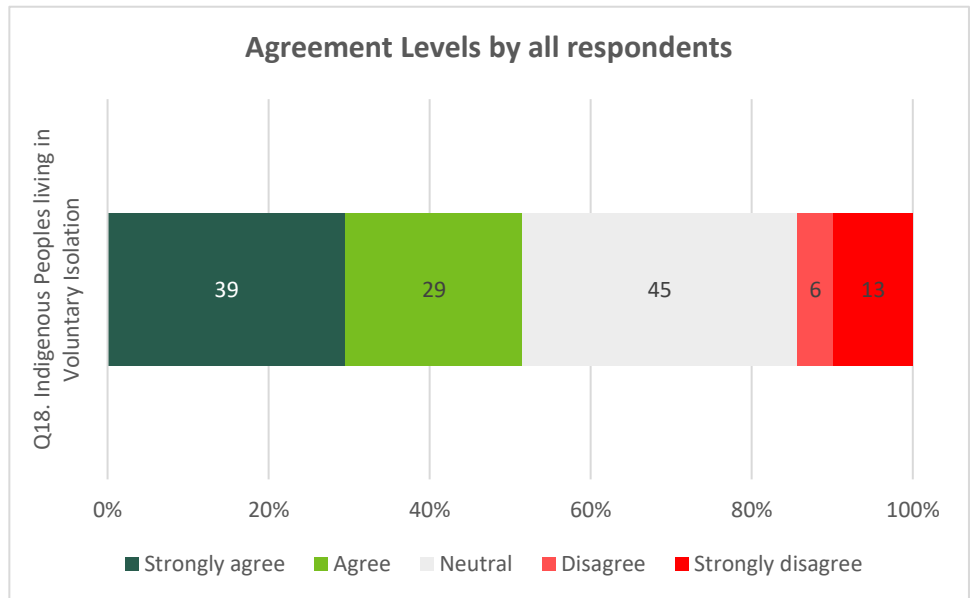


Figure 26. Agreement levels for Question 18 across all respondents

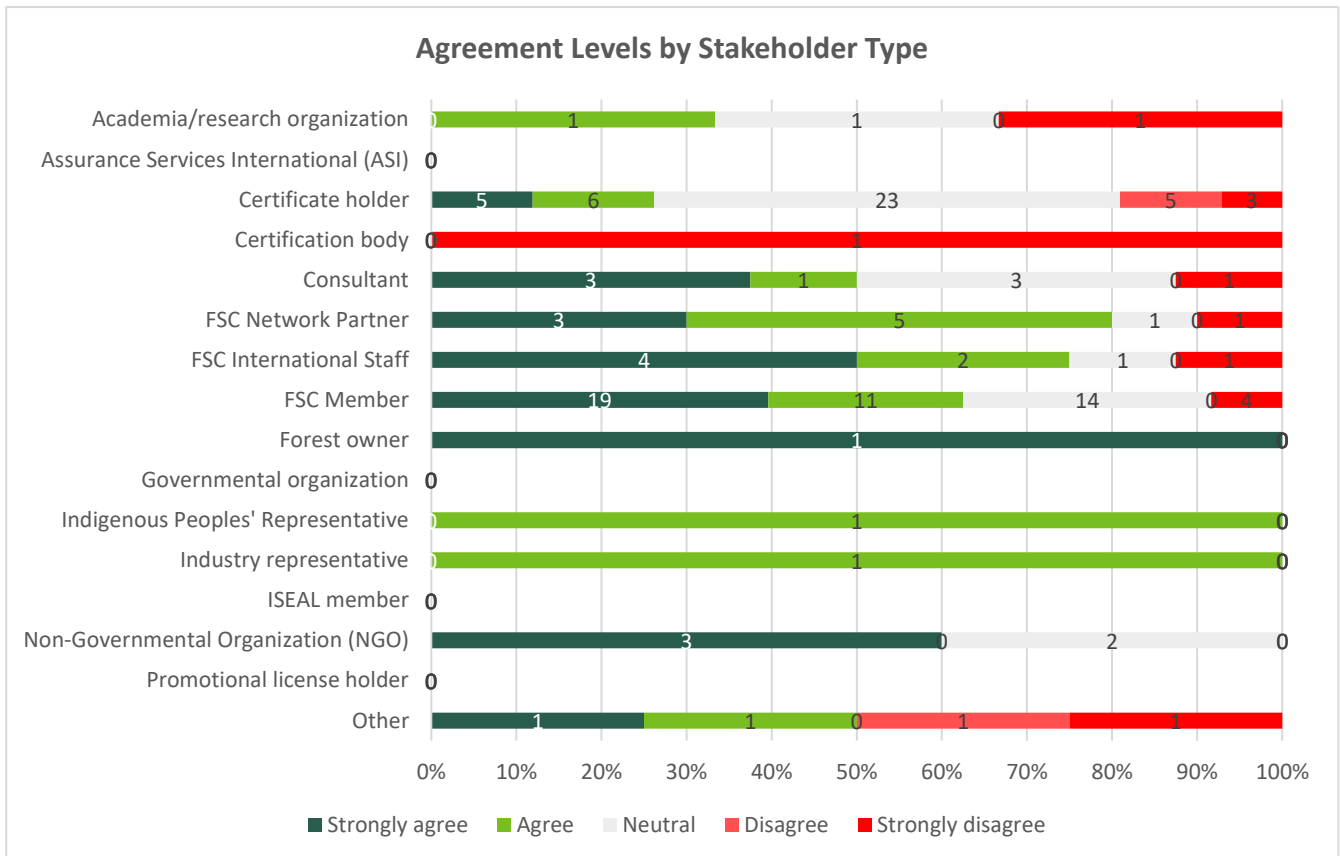


Figure 27. Agreement levels for Question 18 by stakeholder type

The question was answered by 132 respondents. Overall, 52% of respondents agree or strongly agree, indicating moderate support; however, 34% remain neutral and 15% disagree or strongly disagree, showing that the topic generates some polarization.

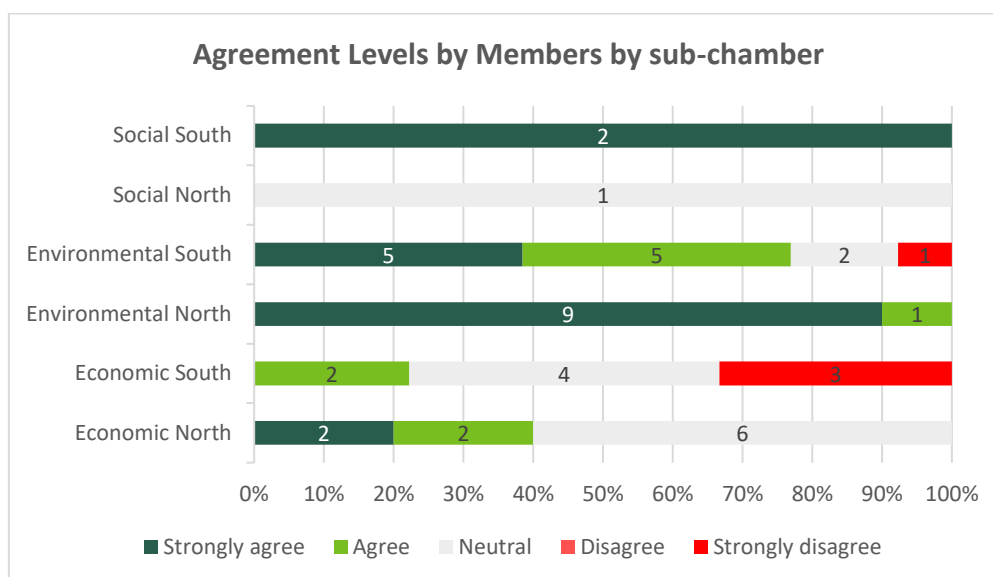


Figure 28. Agreement levels for Question 18 by sub-chamber

The question was answered by 45 FSC members across all six sub-chambers. Overall support is high in the Environmental and Social sub-chambers, while the highest level of disagreement is observed in the Economic South sub-chamber.

**Consolidated summary of discussion points from FSC General Assembly side event on Indigenous Peoples’ rights (Annex 2):**

1. Enhanced support for Indigenous Peoples FSC and Network Partners (NPs) should increase tools, engagement, and direct communication with IP.
2. FPIC improvements: strengthen Free, Prior and Informed Consent processes, especially to amplify the voices of women and youth.
3. FSC expertise and collaboration: FSC IC brings Indigenous Peoples’ rights expertise to decision-making; NPs are building capacity and should act as counterparts to auditors.
4. Recognition of existing efforts: FSC is already doing good work (e.g., FM, HCVs 5 & 6), but these efforts need better communication and storytelling.
5. Certification beyond harvesting: FSC should facilitate certification in areas not solely focused on resource extraction.
6. Beyond legal compliance: FSC should aim to exceed legal requirements, respecting local knowledge and cultural values, especially in places like Congo.

**3.3 Open feedback on Social Requirements**

**Q19. Do you have any additional comments, suggestions or feedback regarding the section on Social Requirements in the PCI revision?**

A total of 67 open feedback comments were received. Overall, respondents back the proposed direction on gender equality and Indigenous Peoples in Voluntary Isolation (IPVI) protections, with the majority seeking risk-based, proportionate design, clear applicability, and country/national flexibility to avoid undue burden – especially for smallholders. The main opposition is not to the intent (equity and rights), but to the mechanics: fear of indicator bloat, duplicative obligations where national law already applies, and globally embedding IPVI-specific rules for a geographically limited topic.

Below is a summary of the key feedback from participants, grouped into five categories according to the degree of their support or opposition to the proposal.

Categories of Comments	Summary of Comments
<b>Strong support</b>	A considerable portion of respondents fully supported strengthening social requirements, framing gender equality and IPVI protections as core rights and safeguards that should be explicit in the PCI. They emphasized that IPVI rights should prevail along with certification interests, and that Free, Prior, and Informed Consent (FPIC) and Indigenous Peoples' (IP) engagement remains central to FSC's credibility.
<b>Support, but with conditions / improvements requested</b>	Many respondents generally supported strengthening gender equality requirements but asked for special attention on country adaptations and proportionality for smallholders. Regarding IPVI, this group highlighted the need for practical guidance on how to identify dynamic territories and for identifying responsible stakeholders if IPVI do not engage.
<b>Neutral / abstain / unclear</b>	A small group did not take a clear position on the topic. Typical reasons were: "not applicable in our geography/no experience with IPVI", "not familiar enough", "country-specific topic", or simply no additional comment. Some were neutral on Q18, without offering concrete design direction. Some recognized the importance of strengthening gender diversity concepts and asked to focus on the adaptability of the standards.
<b>Opposition with alternative proposal / approach</b>	A few respondents questioned whether and how FSC should regulate these topics at the international PCI level, while offering alternatives. Core patterns: (1) IPVI logic challenged ("if they are uncontacted, 'requirements' risk being misconstrued as engagement"; concerns about privacy/feasibility); (2) governance/scoping concerns (social pillar perceived as expanding into broader state responsibilities; risk of 'process-heavy' requirements); (3) preference for national determination (arguing IPVI is geographically specific and should be dealt via Forest Stewardship Standards (FSS) or domestic frameworks, with strong opt-out/applicability controls); (4) concern about demands on CH (requests that requirements do not force CH to accept unilateral stakeholder/NGO proposals without a validity test).
<b>Strong opposition or rejection</b>	A small set rejected the direction outright. Typical comments were: "don't add complexity", "current social requirements are sufficient", "IPVI is too geographically limited to belong in an international standard", or "FSC cannot/should not impose a framework around people who have chosen isolation".

Table 3. Summary of qualitative feedback on Social Requirements

## 4. Climate Change and Biodiversity Conservation

This section consulted on strengthening the integration of climate change, biodiversity conservation, and forest resilience within the PCI framework. The proposals received high levels of support, with strong agreement and limited neutrality or disagreement across stakeholder types and FSC membership sub-chambers. Responses are consistent across Economic, Environmental, and Social chambers. Open feedback largely endorses the proposals, while highlighting the need for outcome-oriented framing and flexibility across forest contexts.

### 4.1 Climate change

**Q20. To what extent do you agree that the revised PCI should include explicit requirements for climate change adaptation and mitigation as exemplified above? (1 – strongly disagree; 5 – strongly agree)**

#### Overview:

In total, 152 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 37 respondents – 24%

**Agree:** 69 respondents – 45%

**Neutral:** 14 respondents – 9%

**Disagree:** 21 respondents – 14%

**Strongly Disagree:** 11 respondents – 7%

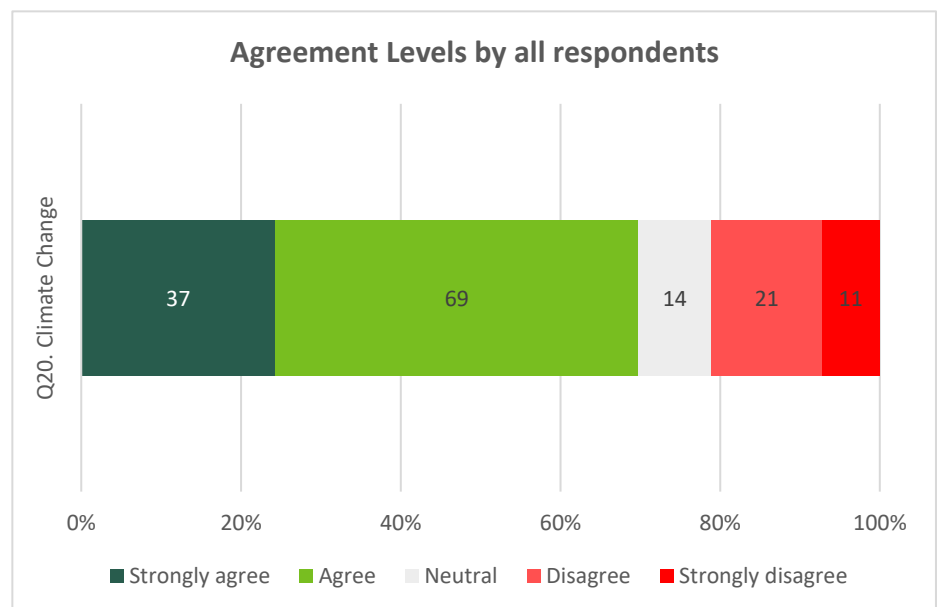


Figure 29. Agreement levels for Question 20 across all respondents

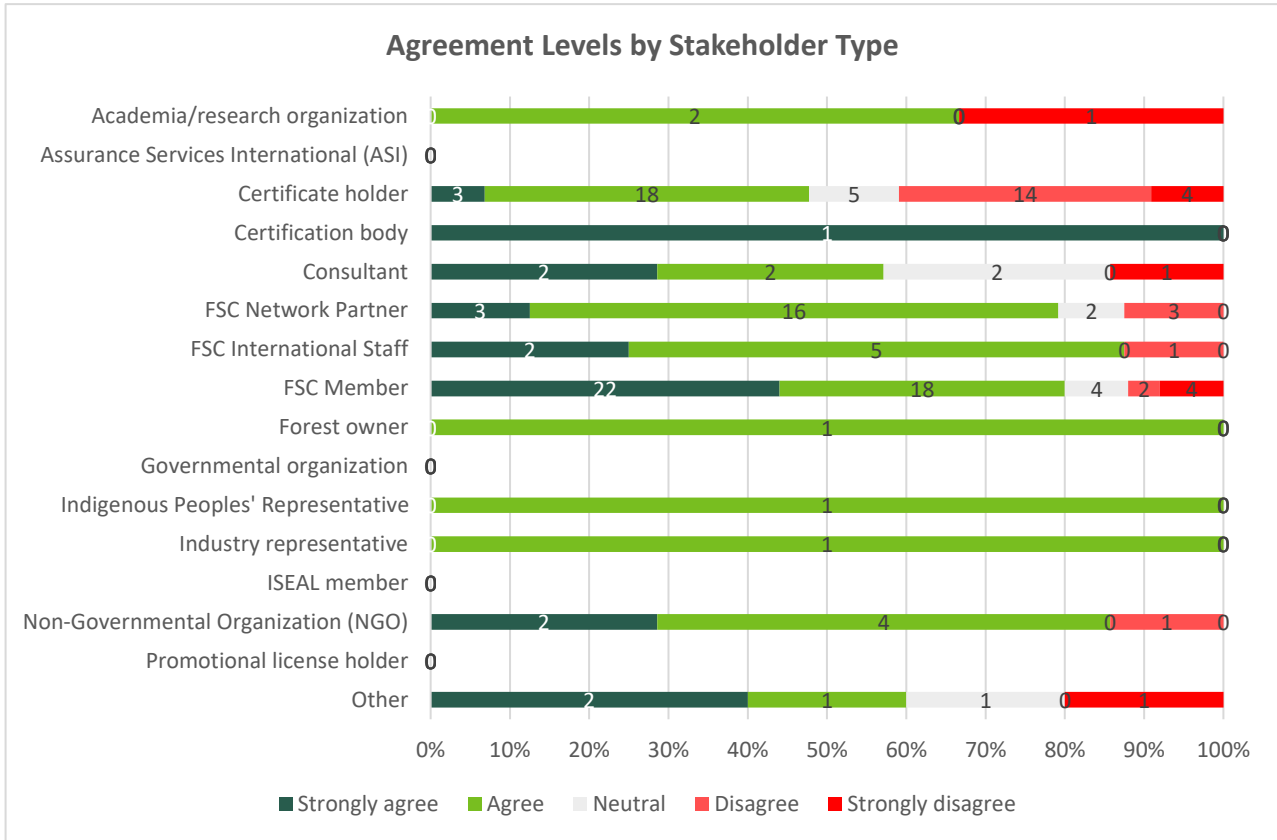


Figure 30. Agreement levels for Question 20 by stakeholder type

The majority of stakeholders supported the inclusion of explicit requirements for climate change in the PCI revision. Of the 152 responses, 69% agreed with the proposal, while 21% disagreed. The main disagreement came from certificate holders, with 41% disagreeing or strongly disagreeing with the proposal.

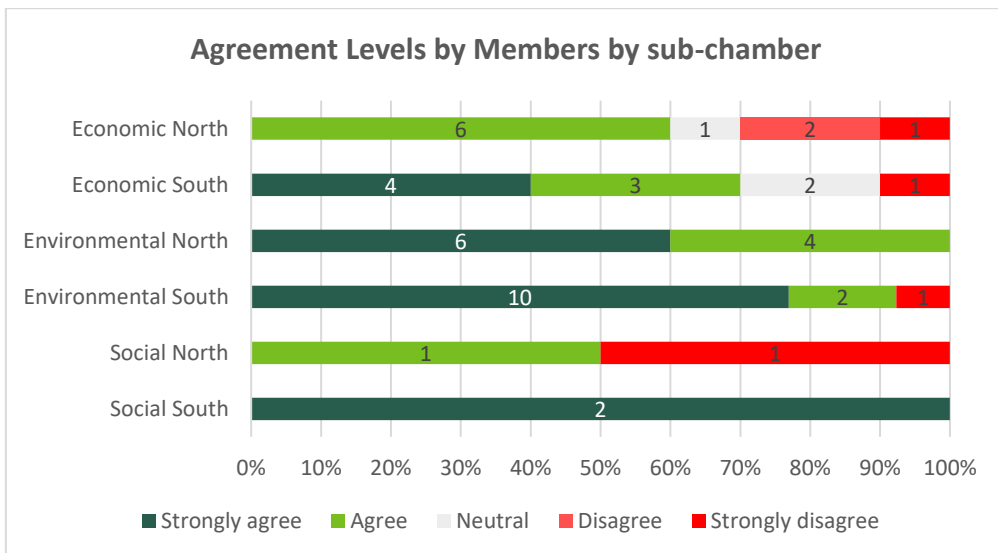


Figure 31. Agreement levels for Question 20 by sub-chamber

The question was answered by 47 FSC members across all six sub-chambers. Responses indicate strong support in the Environmental sub-chambers, with limited disagreement observed across other sub-chambers.

## 4.2 Biodiversity conservation

**Q21. To what extent do you agree that the revised PCI should strengthen and streamline requirements to achieve measurable biodiversity outcomes, as exemplified in the points above? (1 – strongly disagree; 5 – strongly agree)**

**Overview:**

In total, 153 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 39 respondents – 25%

**Agree:** 61 respondents – 40%

**Neutral:** 24 respondents – 16%

**Disagree:** 21 respondents – 14%

**Strongly Disagree:** 8 respondents – 5%

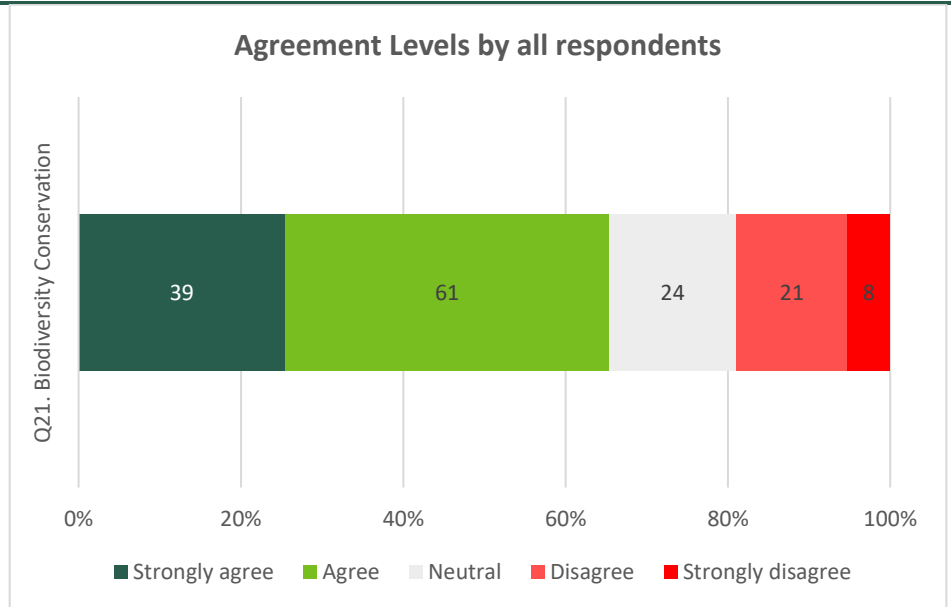


Figure 32. Agreement levels for Question 21 across all respondents

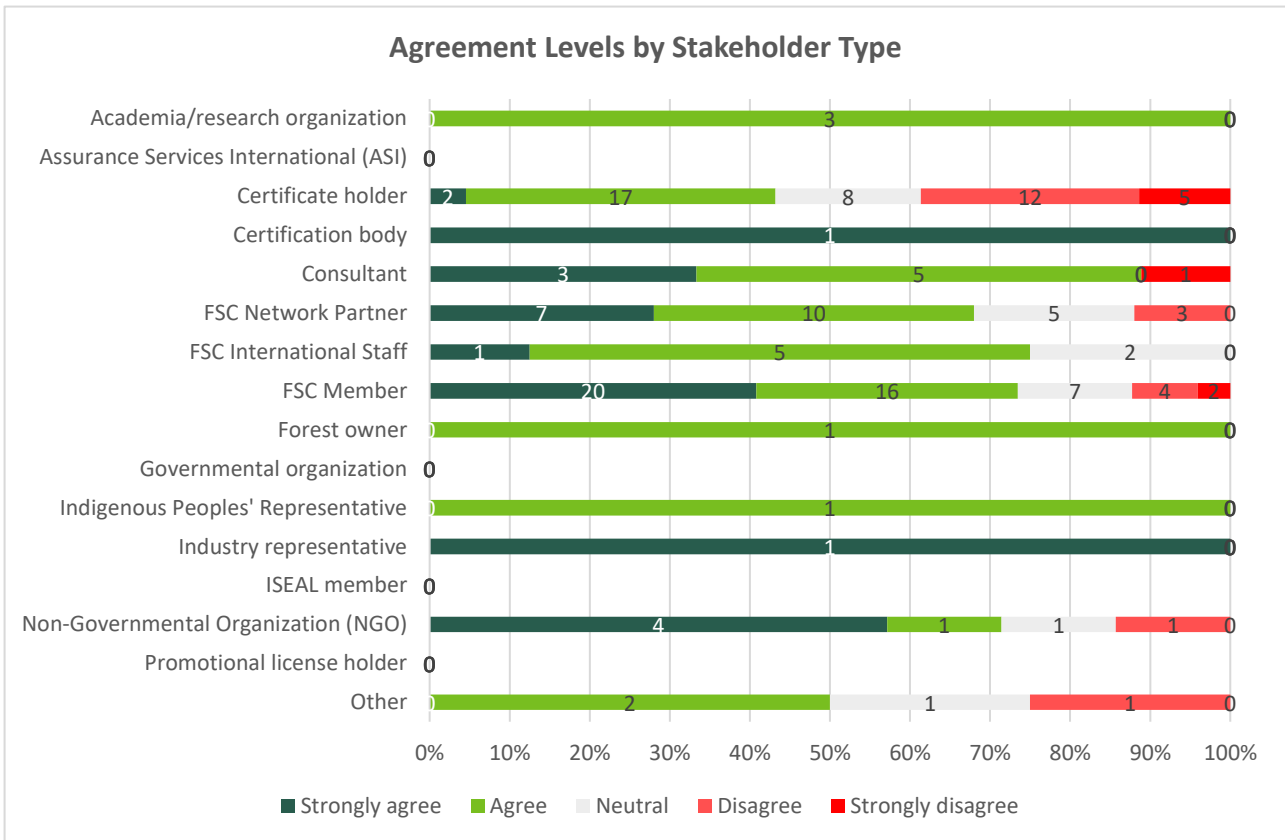


Figure 33. Agreement levels for Question 21 by stakeholder type

The majority of stakeholders supported strengthening and streamlining requirements to achieve measurable biodiversity outcomes in the PCI revision, although some disagreement and neutral responses were also noted. Of the 153 responses provided, 65% agreed or strongly agreed with the proposal, while

19% disagreed or strongly disagreed. The main disagreement came from certificate holders, with 39% disagreeing or strongly disagreeing with the proposal.

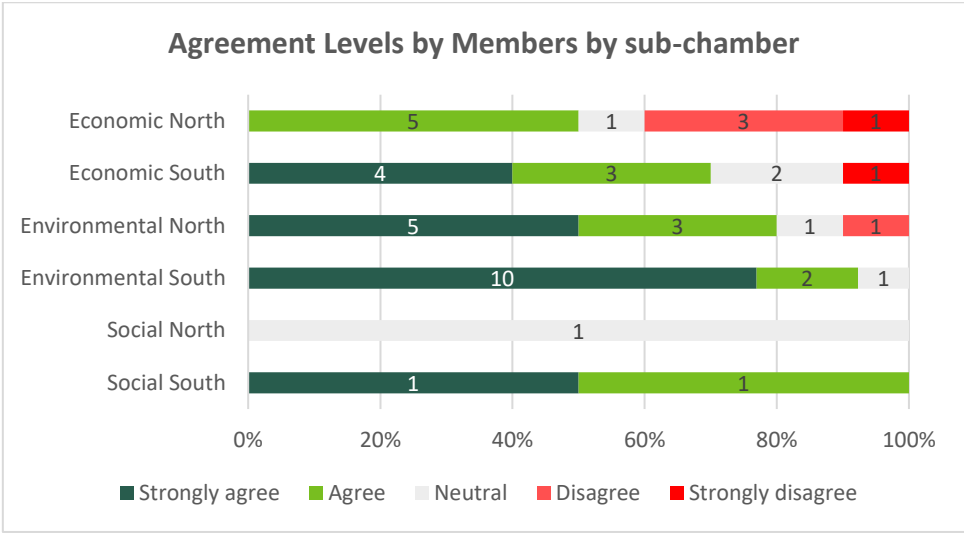


Figure 34. Agreement levels for Question 21 by sub-chamber

The question was answered by 46 FSC members across all six sub-chambers. Overall, support is strong in the Environmental sub-chambers and remains generally positive in the Economic sub-chambers, while some disagreement (40%) is observed in the Economic North sub-chamber.

**Consolidated summary of discussion points from the General Assembly side event on biodiversity Annex 2:**

1. FSC strengths: FSC is strong in biodiversity and conservation; these should remain central, alongside traditional knowledge.
2. Knowledge sharing: learn from regions like Australia; expand practices to other ecosystems and share biodiversity monitoring methods.
3. HCVs and biodiversity: use High Conservation Values (HCVs) as a lens for biodiversity and extreme event planning.
4. Adaptation and resilience: forests must adapt to changing conditions while maintaining biodiversity and ecosystem services.
5. Communication strategy: improve both quantity and quality of climate-related communications, even beyond the PCI.
6. Chain of Custody (CoC) awareness: FM certificate holders must understand product lifecycle impacts, even if products are burned.

### 4.3 Forest resilience

**Q22. To what extent do you agree that FSC should make its requirements more explicit in promoting forest resilience against the negative effects of climate change? (1 – strongly disagree; 5 – strongly agree)**

**Overview:**

In total, 145 out of 186 respondents answered this question.

An outline of the results shows that:

- Strongly Agree:** 41 respondents – 28%
- Agree:** 56 respondents – 39%
- Neutral:** 21 respondents – 14%
- Disagree:** 26 respondents – 18%
- Strongly Disagree:** 1 respondent – 1%

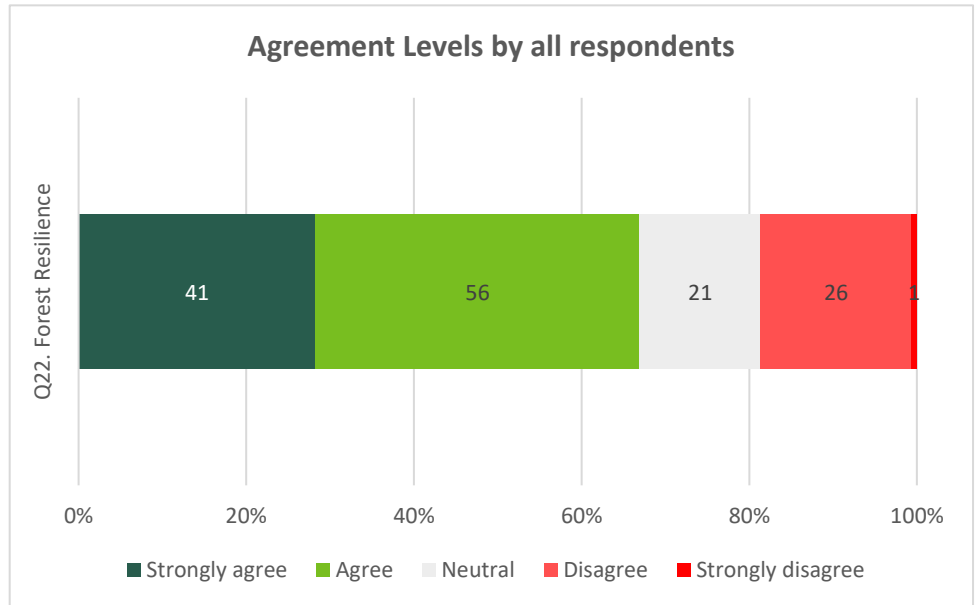


Figure 35. Agreement levels for Question 22 across all respondents

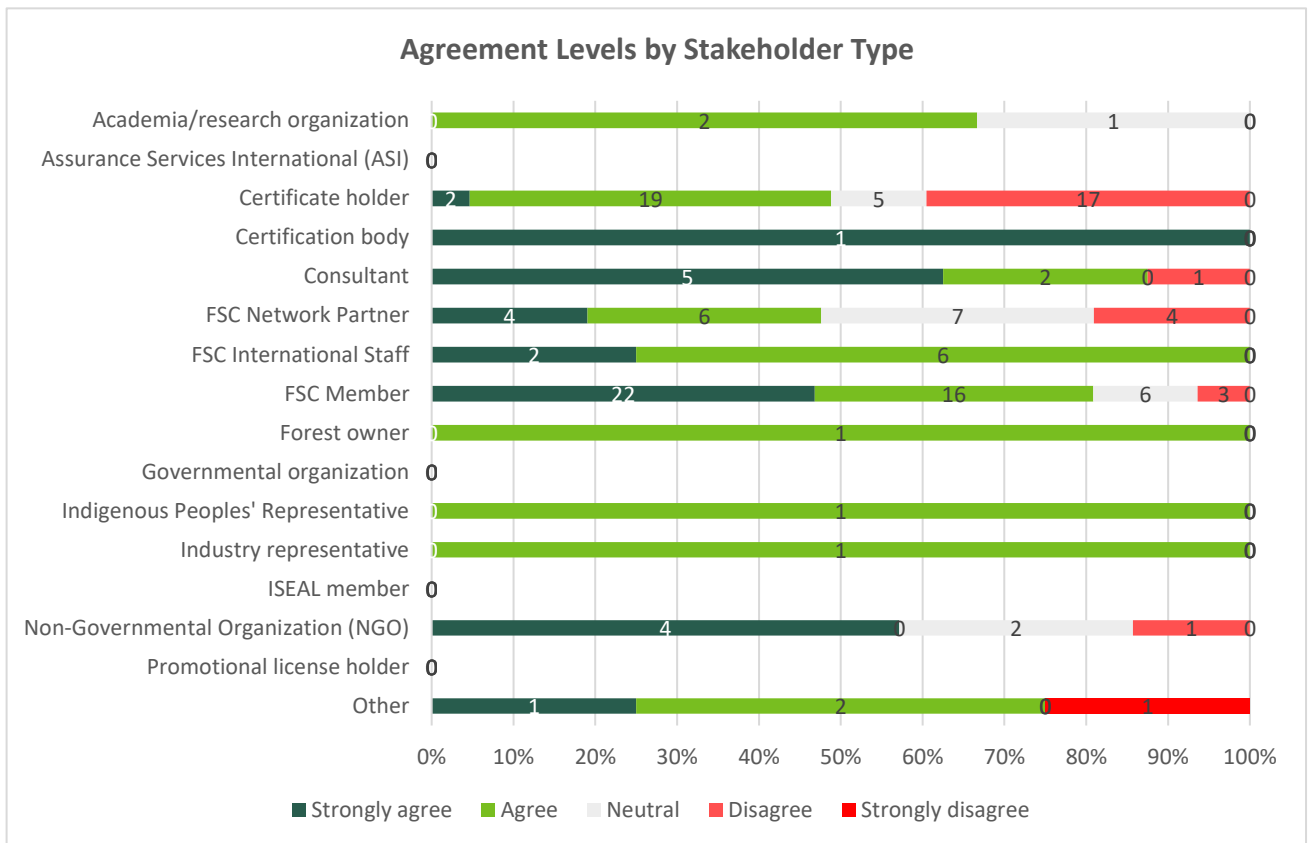


Figure 36. Agreement levels for Question 22 by stakeholder type

The majority of stakeholders are in favour of developing more explicit requirements to promote forest resilience. Of the 145 responses, 67% agreed with the proposal, while 19% disagreed. The main disagreement came from certificate holders, with 39% disagreeing or strongly disagreeing with the proposal.

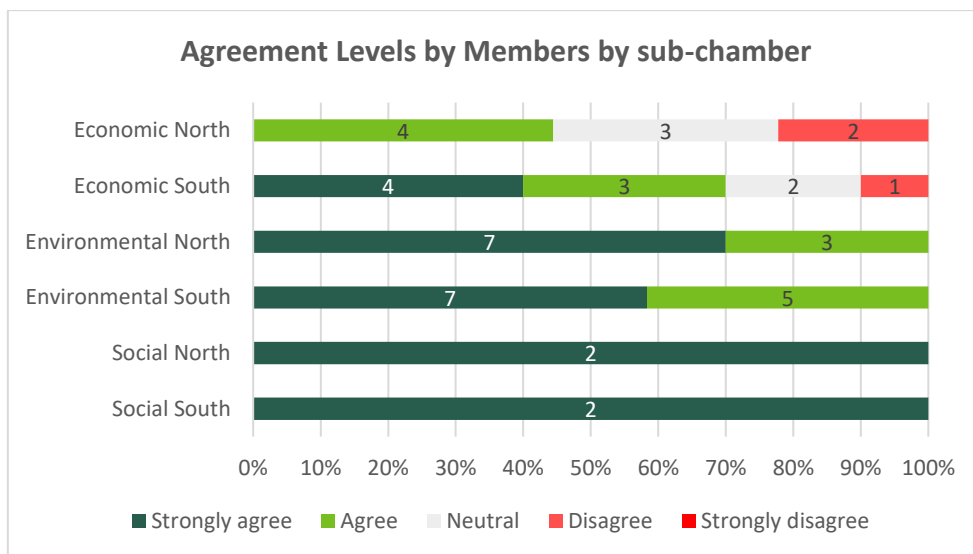


Figure 37. Agreement levels for Question 22 by sub-chamber

The question was answered by 45 FSC members across all six sub-chambers. Responses indicate high levels of support across sub-chambers, especially within the Environmental and Social sub-chambers, with only limited disagreement observed in the Economic sub-chambers.

#### Consolidated summary of discussion points from FSC General Assembly side event on climate Annex 2:

1. Carbon strategies: emphasize carbon sequestration (above/below ground and in products) and accounting; carbon credits should reduce harvest pressure.
2. Business models: develop investment-driven models that benefit forest owners and incentivize conservation.
3. Climate risk management: companies need strategies for wildfire preparedness and broader climate-related risks.
4. Standards credibility: overloading adaptation into FSC standards risks diluting their clarity and credibility.
5. Outcome-focused certification: shift from process-heavy standards to impact-driven approaches; explore alternative certification systems.
6. Carbon credit relevance: consider the end-product's carbon impact, not just forest-level metrics.
7. Climate adaptability mapping: identify where climate adaptation is addressed, including risks like landslides in Canada.
8. Carbon footprint tracking: measure operational emissions and integrate local/traditional knowledge.

#### 4.4 Open feedback on Climate Change and Biodiversity Conservation

##### Q23. Do you have any additional comments, suggestions or feedback regarding the section on climate change, biodiversity conservation, and forest resilience in the PCI revision?

A total of 92 open feedback comments were received on this section. Overall, respondents back the proposal on climate change, biodiversity and forest resilience. Strong supporters of the proposals broadly endorse making climate, biodiversity and resilience explicit in the PCI, often linking good stewardship to positive impact and calling for clarity rather than new mechanisms. Supporters emphasize practicality, flexibility, and science/feasibility as conditions for their support. Neutral respondents recognize the topics' importance but seek clarity on definitions, scope, and how outcomes translate into auditable requirements. Opposition is often targeted at prescriptive elements; alternatives typically emphasize outcome focus, local context, and landscape-level planning. Very few comments from strong opposition generally reject expanding requirements or warn that certification could become economically unsustainable.

Below is a summary of key feedback from participants, grouped into five categories according to the degree of their support or opposition to the proposal.

Categories of Comments	Summary of Comments
<b>Strong support</b>	Comments from strong supporters to make climate/biodiversity/resilience explicit in the PCI emphasized including explicit outcomes and keeping the standard coherent; some suggested positioning overarching climate language in the PCI preamble. Outcome orientation in forest resilience is also welcomed, favouring clearly stated intended outcomes over scattered activity lists, to simplify auditing and communication.
<b>Support, but with conditions / improvements requested</b>	Many respondents supported stronger provisions on climate, biodiversity, and resilience, but emphasized feasibility and design safeguards. Core patterns: (1) flexibility and non-prescriptive logic (call for locally adaptable measures; reject fixed thresholds and 'natural regeneration only' prescriptions; favour site- and landscape-specific approaches); (2) monitoring burden concerns (warn that data collection and indicator reporting could be costly and hard to audit; request simple, standardized, and practical metrics, leveraging existing IGI); (3) value/compensation expectations (argue higher ambition must be paired with mechanisms to monetize or compensate added climate/biodiversity value to avoid reduced uptake); (4) evidence-based framing (support climate outcomes but insist decisions remain science based; seek recognition of carbon substitution and long-lived wood products; caution against carbon-only focus); (5) Indigenous knowledge integration (support inclusion where relevant and with consent, but stress that management decisions should remain evidence-driven).
<b>Neutral / abstain / unclear</b>	Many respondents acknowledged the importance of these topics but asked for clarity and proportionality under these topics: (1) definition gaps (request clearer explanation of resilience v adaptation; suggest alternative terminology like 'adaptation capacity'); (2) avoiding redundancy (concern that many elements already exist in the PCI/IGI; propose visibility tools such as colour-coding rather than adding new layers); (3) feasibility of monitoring (accept outcome monitoring but stress cost control and alignment with national Standard Development Group frameworks; prefer simple, comparable indicators).

Categories of Comments	Summary of Comments
<b>Opposition with alternative proposal / approach</b>	Some respondents opposed prescriptive elements and proposed alternative strategies. Core patterns mentioned were: (1) opposition to rigid prescriptions (reject fixed age/density thresholds and 'natural regeneration only' post-fire; advocate assisted regeneration, site-specific species, and risk diversification); (2) outcome-not-practice focus (argue that the PCI should define outcomes and allow diverse management practices; emphasize landscape-level planning over stand-level rules); (3) carbon metric concerns (oppose mandatory carbon storage targets, citing uncontrollable external factors; prefer action-based indicators to outcome metrics).
<b>Strong opposition or rejection</b>	Very few respondents rejected expanding the requirements, mentioning economic and operational risks, as well as cost and complexity fears. They warned that additional monitoring and reporting layers would raise costs, complicate audits, and erode business value. They also questioned the viability for certificate holders.

*Table 4. Summary of qualitative feedback on Climate Change and Biodiversity Conservation*

## 5. Intact Forest Landscapes

This section focused on whether the existing protection threshold approach for Intact Forest Landscapes (IFLs) should be maintained in the PCI revision. Responses show a polarized pattern, with disagreement outweighing agreement across several stakeholder types. Stakeholder-type results indicate strong disagreement among certain stakeholders, while responses from FSC membership sub-chambers show lower support from the Economic sub-chambers and more mixed views elsewhere. Open feedback reflects concerns about rigidity, feasibility, and alignment with outcome-based approaches, consistent with the adoption of Motion 45 during the consultation period.

### 5.1 Intact Forest Landscapes

**Q24. To what extent do you agree that FSC should maintain the protection threshold approach for IFLs within the PCI? (1 – strongly disagree; 5 – strongly agree)**

#### Overview:

In total, 132 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 15 respondents – 11%

**Agree:** 34 respondents – 26%

**Neutral:** 31 respondents – 23%

**Disagree:** 25 respondents – 19%

**Strongly Disagree:** 27 respondents – 20%

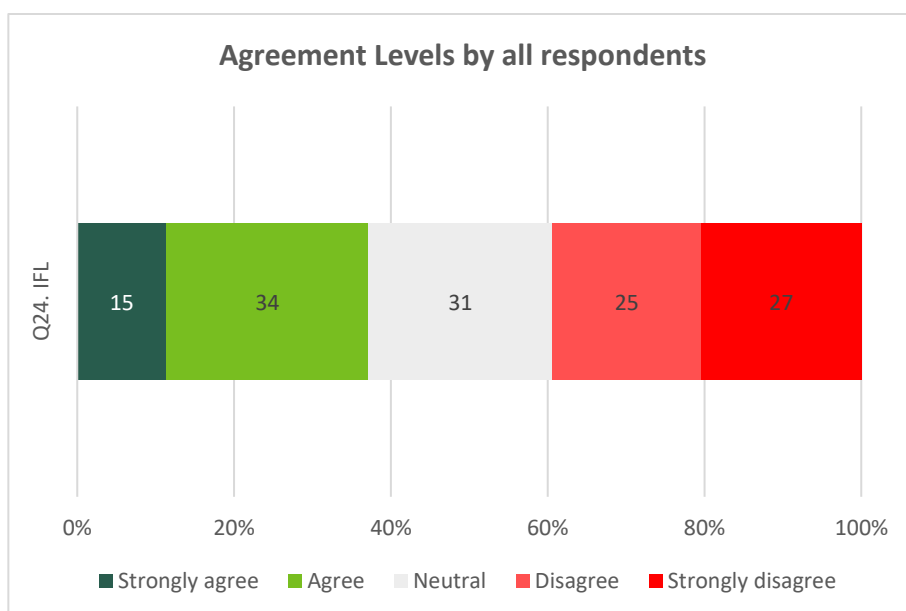


Figure 38. Agreement levels for Question 24 across all respondents

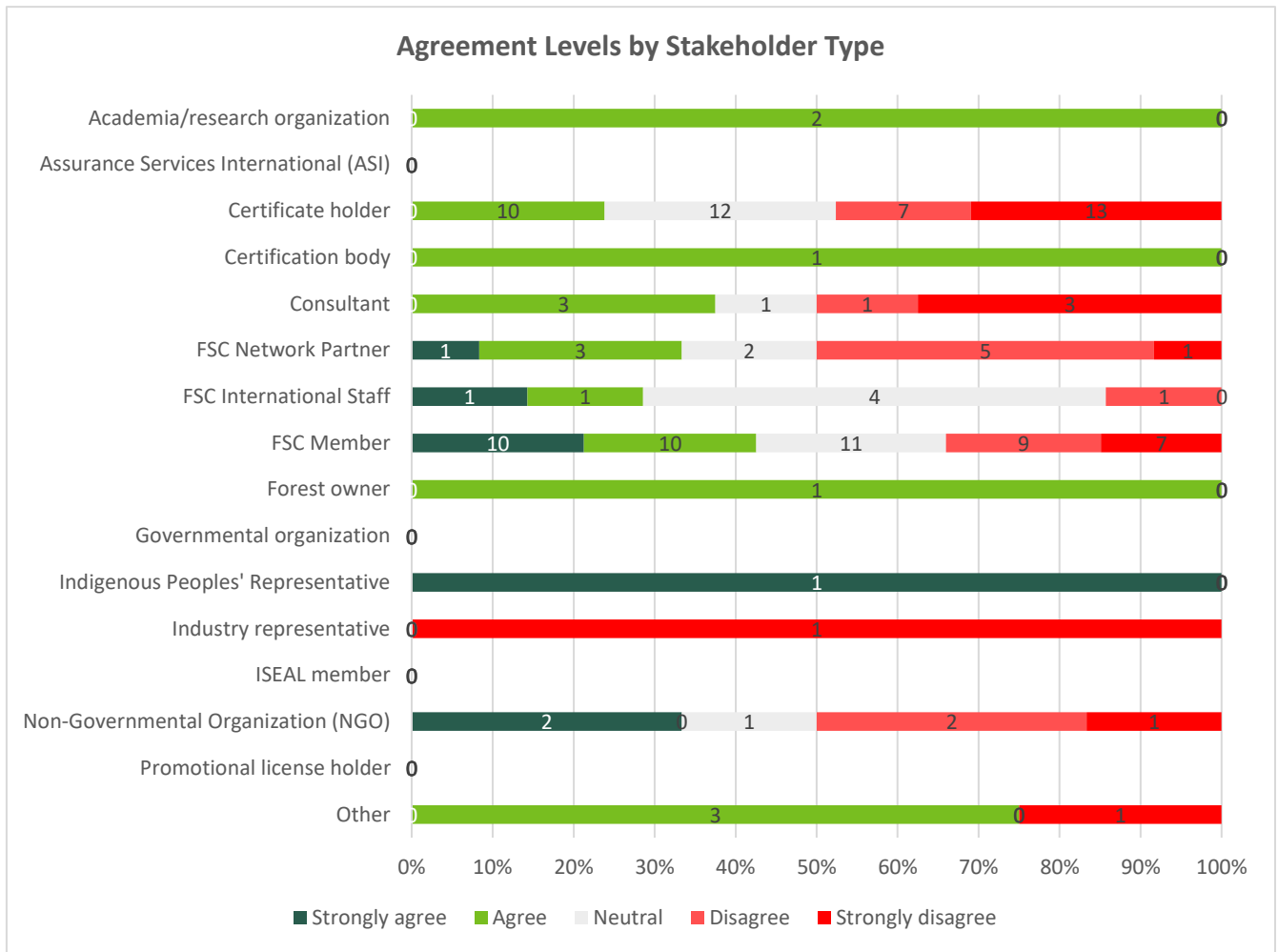


Figure 39. Agreement levels for Question 24 by stakeholder type

The question was answered by 132 respondents. Overall, 37% agreed or strongly agreed with maintaining the protection threshold approach for IFLs in the PCI revision, while 39% of the respondents disagreed or strongly disagreed. The strongest disagreement came from the industry representative (100% - single respondent) and consultants, in addition to NGOs and FSC Network Partners (50%), while 48% of certificate holders and 34% of FSC members disagreed or strongly disagreed with the proposal. In line with Motion 45 ‘Moving beyond fixed thresholds to outcome-based conservation for Intact Forest Landscapes (IFLs)’, passed at the FSC General Assembly 2025, maintaining the threshold approach did not receive strong support from FSC stakeholders.

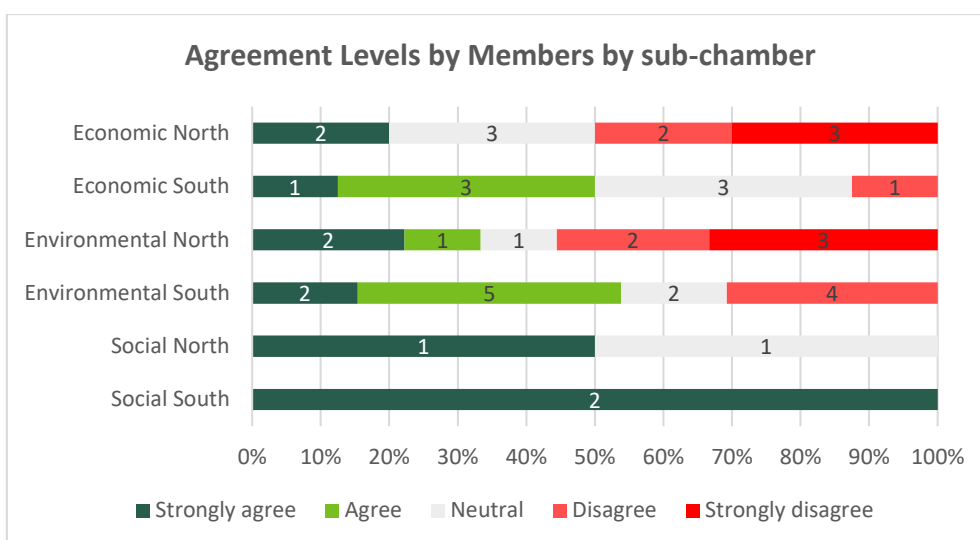


Figure 40. Agreement levels for Question 24 by sub-chamber

The question was answered by 44 FSC members across all six sub-chambers. Responses show limited overall support (<50%) for maintaining the protection threshold approach for Intact Forest Landscapes, with disagreement outweighing agreement in several sub-chambers. In line with Motion 45, adopted at the FSC General Assembly 2025, the results indicate that the threshold-based approach did not receive strong support across FSC membership sub-chambers.

## 5.2 Open feedback on Intact Forest Landscapes

### Q25. Do you have any additional comments, suggestions, or feedback regarding the section on Intact Forest Landscapes in the PCI revision?

A total of 69 open feedback comments were received on this section. The proposal was provided in this consultation before the FSC General Assembly in 2025, where Motion 45/2025 ‘Moving beyond fixed thresholds to outcome-based conservation for Intact Forest Landscapes (IFLs)’ was passed, setting the direction on IFLs.

With respect to the proposal in this consultation, overall, respondents are divided on the proposal presented for IFLs. Strong supporters favour maintaining the current protection threshold approach, often mentioning its simplicity, verifiability, and role in creating a common ground. Some call for globally defined ‘no-go zones’ for the most intact forests. Supporters with conditions emphasize that thresholds could remain as a baseline, but should be complemented by regional modifiers, landscape-level planning, and national flexibility to ensure feasibility and proportionality. Neutral respondents generally acknowledge the importance of IFL protection but seek clarity on definitions, mapping rules, and applicability, especially for regions without IFLs. The opposition is the dominant cluster, largely driven by the passing of Motion 45/2025, calling for FSC to move away from fixed thresholds toward outcome-based, context-sensitive, dynamic approaches integrated with national frameworks and landscape governance. These comments often stress that thresholds are arbitrary, ignore Scale, Intensity, and Risk (SIR) differences, and create governance and cost conflicts. Very few comments express strong rejection, arguing that maintaining thresholds is ineffective and burdensome, and demanding an immediate alternative approach.

Below is a summary of key feedback from participants, grouped into five categories according to the degree of their support or opposition to the proposal.

Categories of Comments	Summary of Comments
<b>Strong support</b>	Some respondents fully supported maintaining the current protection threshold approach for IFLs, mentioning its simplicity, verifiability, and role in creating a level playing field. Some also proposed globally defined ‘no-go zones’ for the most intact forests to prevent industrial activity.
<b>Support, but with conditions / improvements requested</b>	Few respondents supported retaining thresholds as a baseline but emphasized the need for flexibility. They suggested complementing thresholds with regional ecological modifiers, stronger landscape-level planning, and stricter national indicators where IFL integrity is at higher risk. Practicality and proportionality were recurring themes, with calls for feasible, auditable requirements and clear pathways for country adaptation.
<b>Neutral / abstain / unclear</b>	Some respondents did not take a clear position. Typical reasons included lack of applicability (e.g., plantations or regions without IFLs), limited familiarity, or uncertainty about operational implications. These respondents requested clearer definitions, mapping rules, and practical examples, and urged FSC to reach a durable solution that avoids repeated debates.
<b>Opposition to the alternative proposal / approach</b>	The majority of the respondents, often referencing Motion 45, called for FSC to move away from fixed thresholds toward outcome-based, context-sensitive, and dynamic conservation approaches. Respondents argued that thresholds are arbitrary and ignore SIR differences, legal realities, and governance complexities. Alternatives emphasized landscape-level planning, integration with national frameworks, stronger linkage to HCV 2, and transparent mapping and reintegration mechanisms. Some highlighted governance and cost concerns, noting that thresholds burden certified operators while leaving government-driven development or uncertified actors unaffected.
<b>Strong opposition or rejection</b>	Very few respondents rejected maintaining thresholds outright, mentioning ineffectiveness, cost, and governance mismatch. These respondents demanded an immediate alternative approach and questioned FSC’s role in regulating IFLs at the PCI level.

*Table 5. Summary of qualitative feedback on Intact Forest Landscapes*

## 6. User Orientation

This section consulted on improving user orientation of the PCI, including the purpose of the IGI, a new PCI structure, a modular approach, and streamlining. Across all questions, the proposals received very high and consistent support, with agreement or strong agreement dominating responses and minimal neutrality or disagreement. This pattern is consistent across stakeholder types and FSC membership sub-chambers. Open feedback strongly supports improving usability, coherence, and structural clarity of the normative framework.

### 6.1 The purpose of the IGI

**Q26. Do you agree with retaining the purpose of the IGI as the starting point for developing country adaptations? (Yes / No)**

#### Overview:

In total, 148 out of 186 respondents answered this question.

An outline of the results shows that:

**Yes:** 132 respondents – 89%

**No:** 16 respondents – 11%

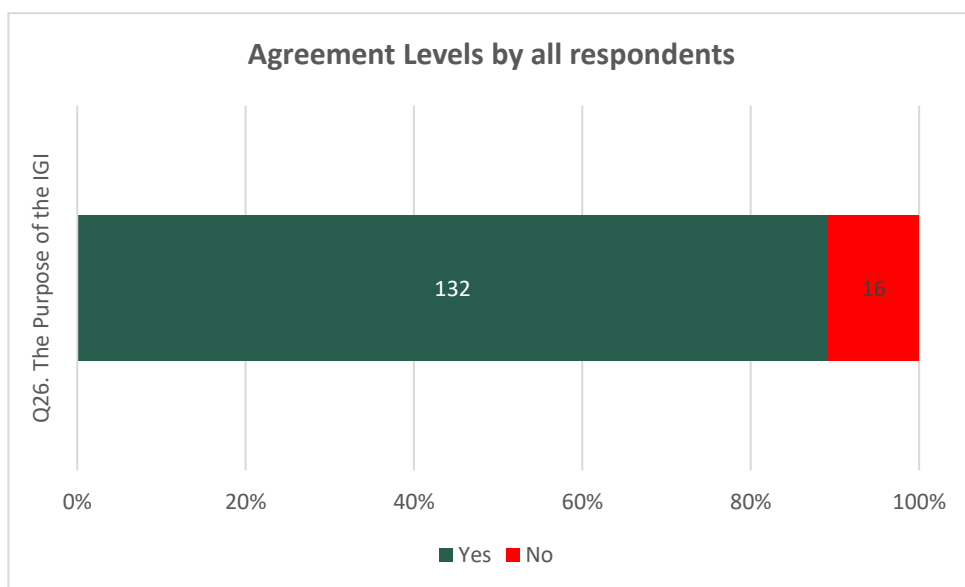


Figure 41. Agreement levels for Question 26 across all respondents

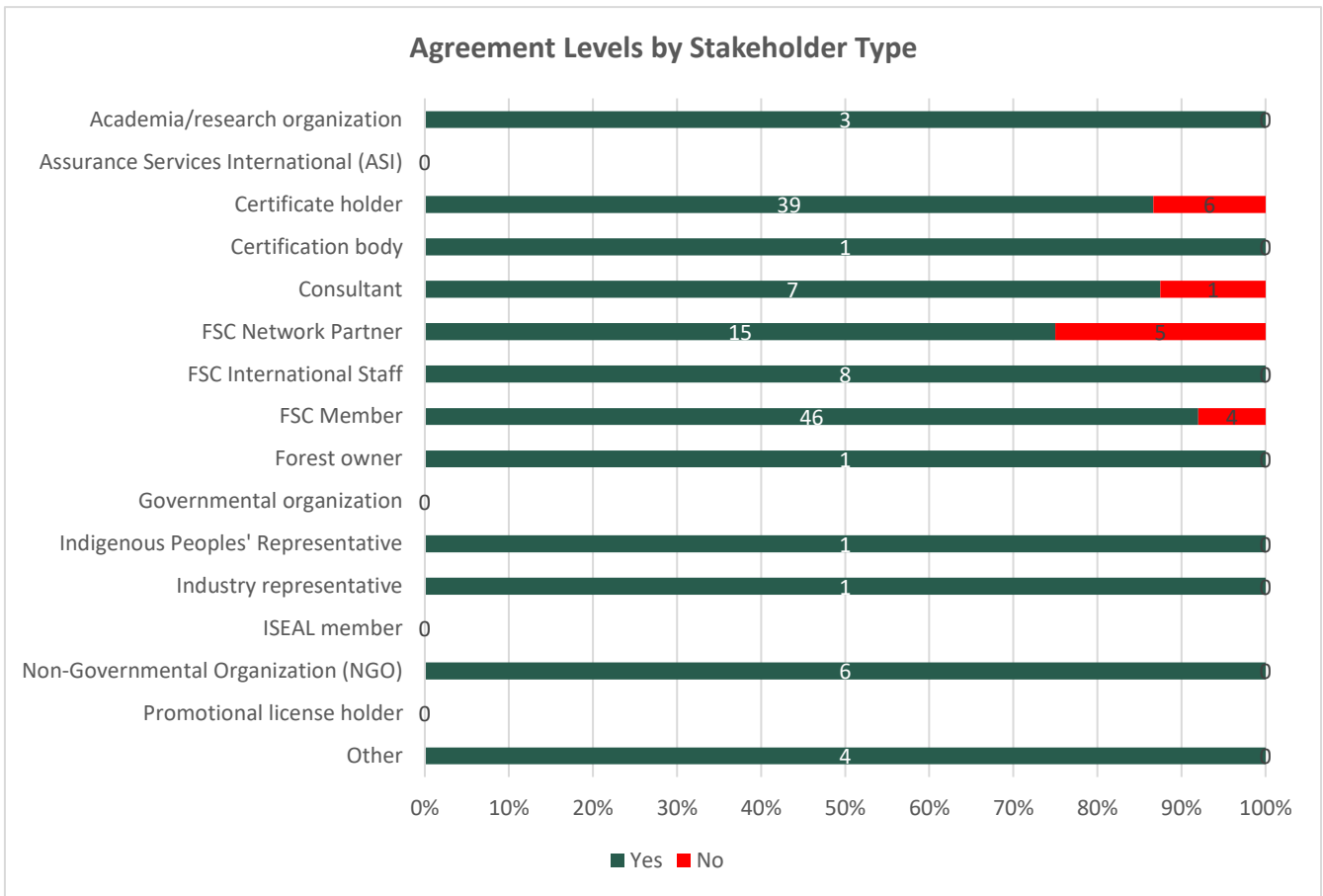


Figure 42. Agreement levels for Question 26 by stakeholder type

The question was answered by 148 respondents. The majority of respondents (89%) answered ‘Yes’, indicating strong overall support for maintaining the IGI as the foundation for national standard development.

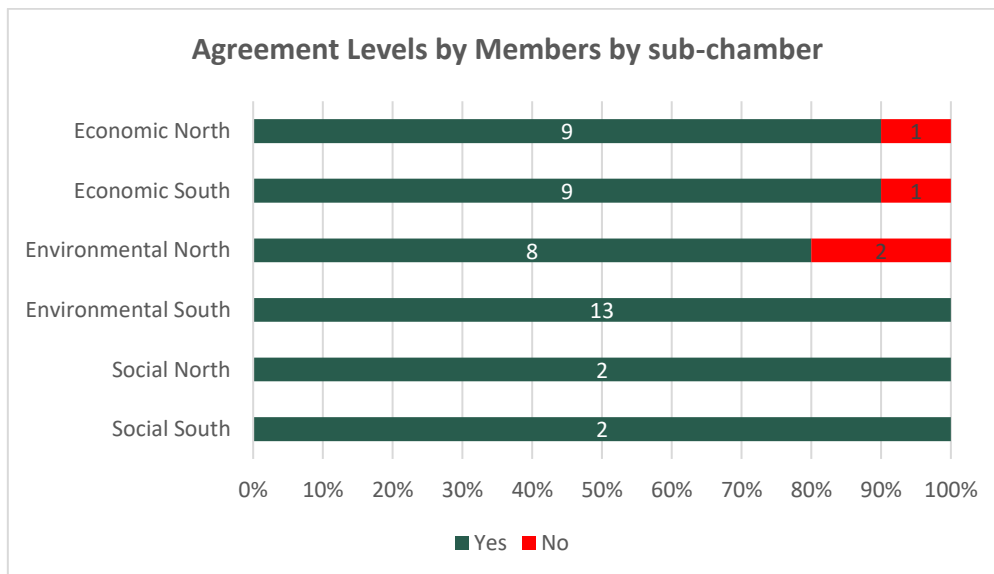


Figure 43. Agreement levels for Question 26 by sub-chamber

The question was answered by 47 FSC members across all six sub-chambers. Responses show near-unanimous support across all sub-chambers (>80%).

## 6.2 Proposed new structure of the PCI

**Q27. Given the global challenges and opportunities identified for the PCI revision (e.g., improving user orientation, outcome focus, and overall usability while maintaining rigour, auditability, and traceability), to what extent do you agree that the process should explore restructuring the PCI? (1 – strongly disagree; 5 – strongly agree)**

**Overview:**

In total 149 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 40 respondents – 27%

**Agree:** 77 respondents – 52%

**Neutral:** 21 respondents – 14%

**Disagree:** 7 respondents – 5%

**Strongly Disagree:** 4 respondents – 3%

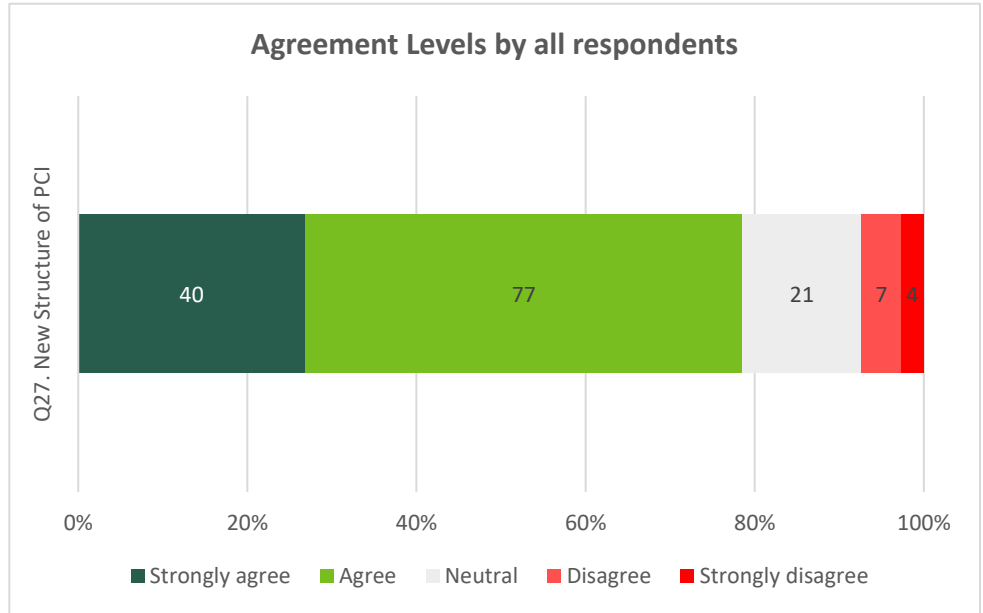


Figure 44. Agreement levels for Question 27 across all respondents

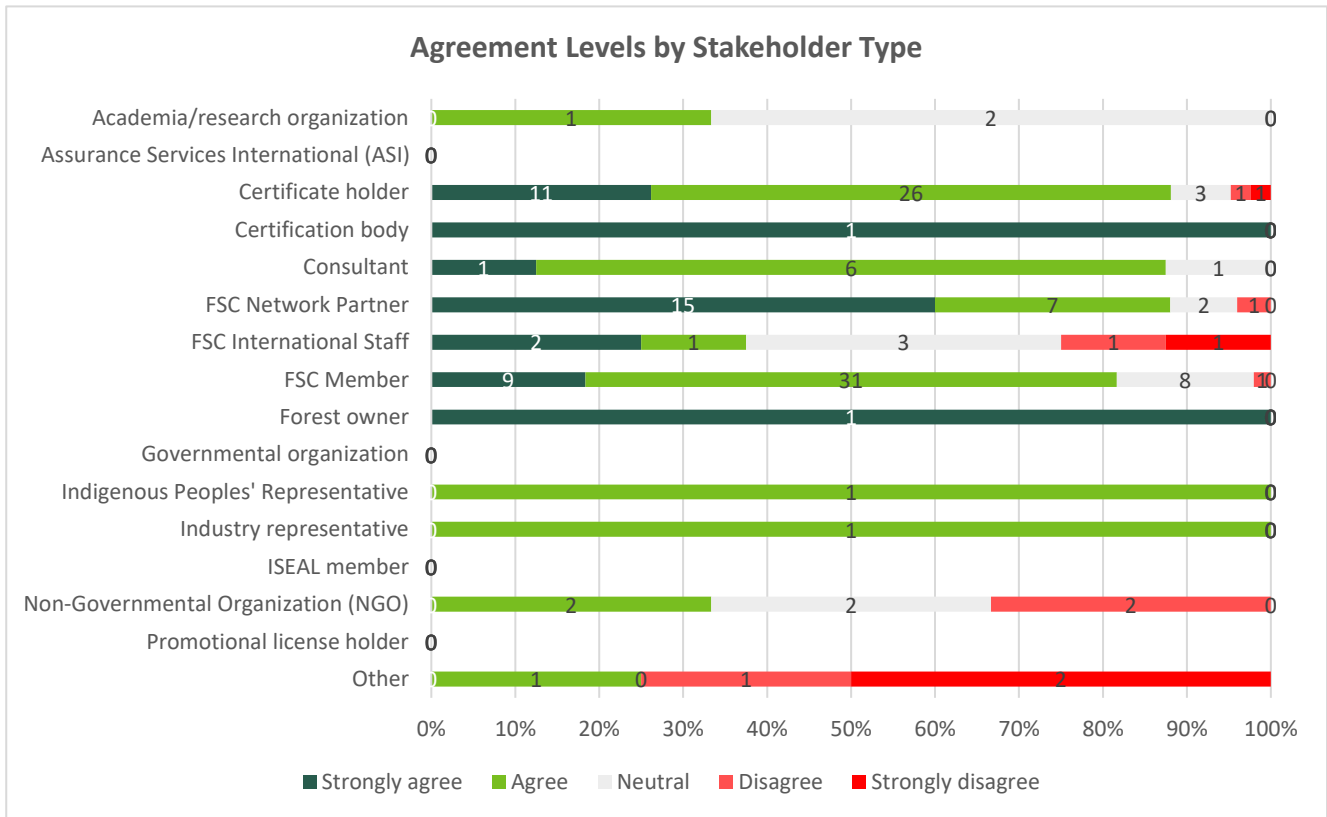


Figure 45. Agreement levels for Question 27 by stakeholder type

Out of 149 responses received, the majority of the stakeholders (79%) agreed or strongly agreed with exploring a new structure for the PCI, while only 8% disagreed or strongly disagreed, and 14% remained neutral to the proposal. There was very little overall disagreement from certificate holders (less than 5%) and FSC members (2%).

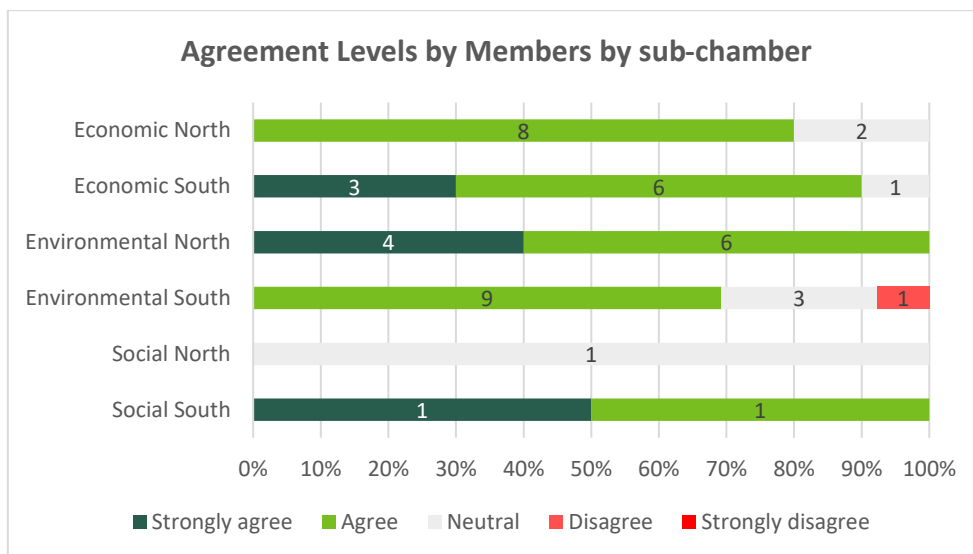


Figure 46. Agreement levels for Question 27 by sub-chamber

The question was answered by 46 FSC members across all six sub-chambers. Overall support is high across all sub-chambers, with a strong majority of respondents indicating agreement or strong agreement, and only limited neutrality and minimal disagreement are observed.

**Consolidated summary of discussion points from the General Assembly side event on the structure of the PCI Annex 1:**

1. The new structure should be simple, easy to understand, and free from redundancy.
2. It should be applicable across different contexts and maintain coherence across principles.
3. Participants agreed that the Principles and Criteria should remain interconnected and not be treated as standalone elements.

**Q28. The proposed revision of the PCI structure identifies three important factors (with their definitions). Please rate those factors that you would consider important when developing the new PCI structure on a scale of 1 to 5 (1 – least important; 5 – most important).**

**Q.28.1 User-oriented (Scale 1 to 5)**

**Q.28.2 Outcome-oriented (Scale 1 to 5)**

**Q.28.3 Streamlined (Scale 1 to 5)**

**Q.28.4 A balanced structure based on the above 3 factors (as exemplified in the figure) (Scale 1 to 5)**

**Overview:**

In total, 144 out of 186 respondents answered this question.

An outline of the results shows that the highest levels of importance (scores 4 and 5) were given to ‘user orientation’, followed by ‘streamlining’:

**User-oriented:** 114 respondents

**Streamlined:** 106 respondents

**Outcome-oriented:** 80 respondents

**Balanced:** 79 respondents

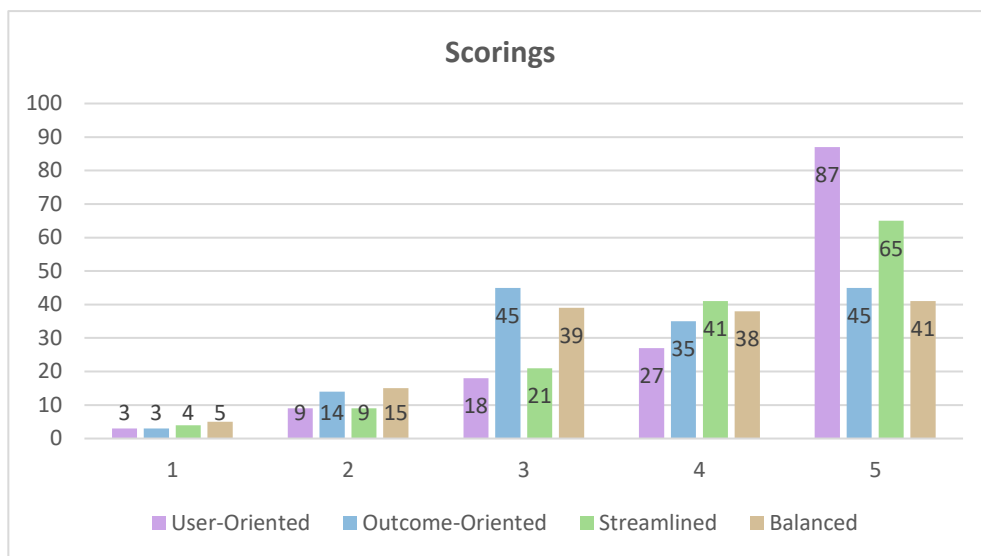


Figure 47. Agreement levels for Question 28.1 – 28.4 across all respondents

Participants were asked to rate, on a scale from 1 to 5 (1 – least important; 5 – most important), the three most important factors (with the 4<sup>th</sup> being the combination of the other three) to consider when developing a new PCI structure. Those who rated a factor 4 or 5 were considered to identify it as most important for the analysis. A total of 114 respondents rated “User-oriented” as most important (ratings of 4 or 5), while 106 respondents rated “Streamlined” as the second most important factor. The outcome-oriented and balanced structural factors were rated as the 3<sup>rd</sup> and 4<sup>th</sup>-most important factors, respectively, by 80 and 79 respondents.

### 6.3 Modular approach

**Q29. To what extent do you support the introduction of a modular approach in the PCI revision (core indicators + pre-configured contexts) to better reflect diverse forest types, products, services, and user groups? (1 – strongly disagree; 5 – strongly agree)**

**Overview:**

In total, 146 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 33 respondents – 23%

**Agree:** 57 respondents – 39%

**Neutral:** 26 respondents – 18%

**Disagree:** 23 respondents – 16%

**Strongly Disagree:** 7 respondents – 5%

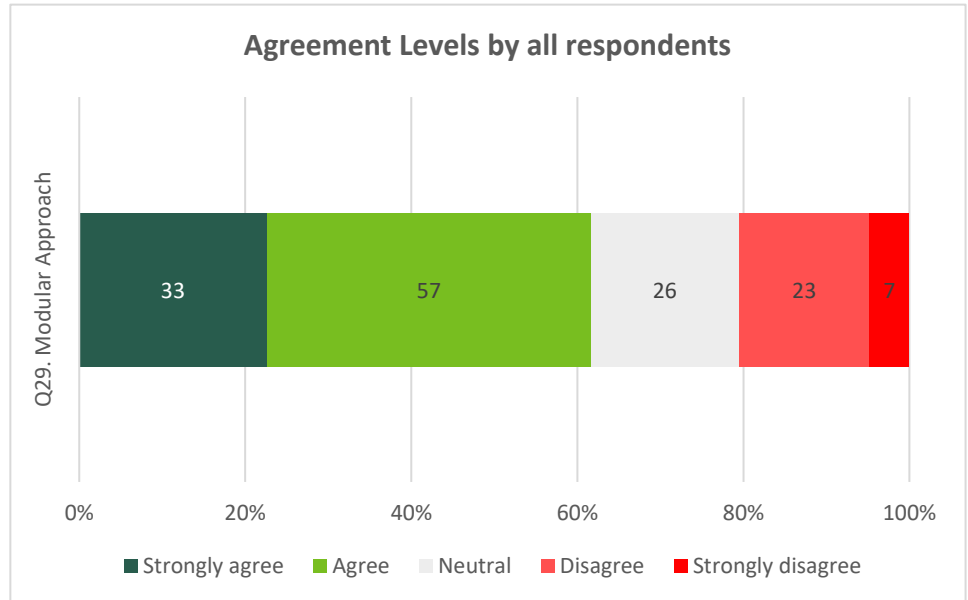


Figure 48. Agreement levels for Question 29 across all respondents

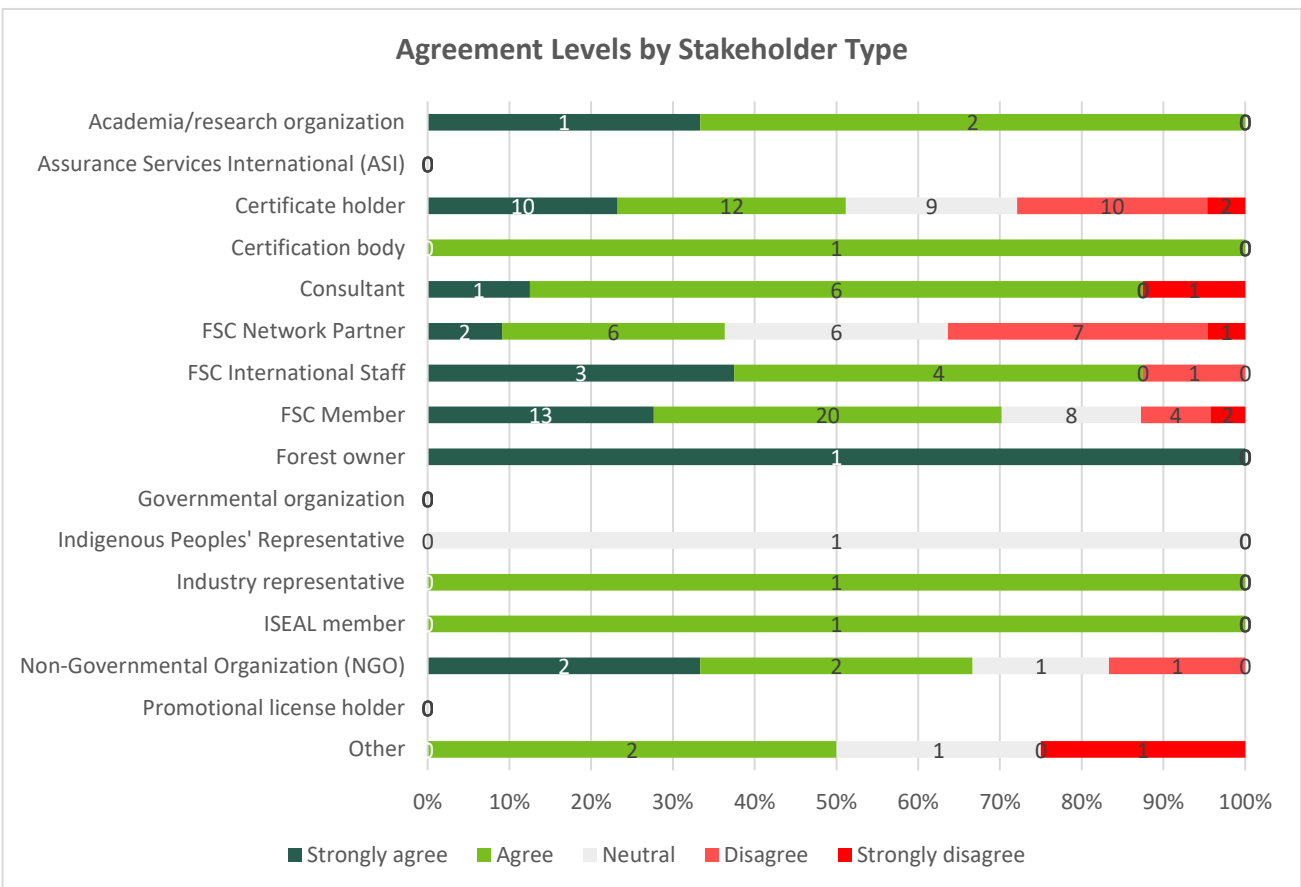


Figure 49. Agreement levels for Question 29 by stakeholder type

The question was answered by 146 respondents. The proposal to introduce a modular approach received strong stakeholder support, with 62% agreeing or strongly agreeing, 18% being neutral, and only 21% disagreeing or strongly disagreeing. Overall, the strong consensus indicates that stakeholders support the introduction of a modular approach.

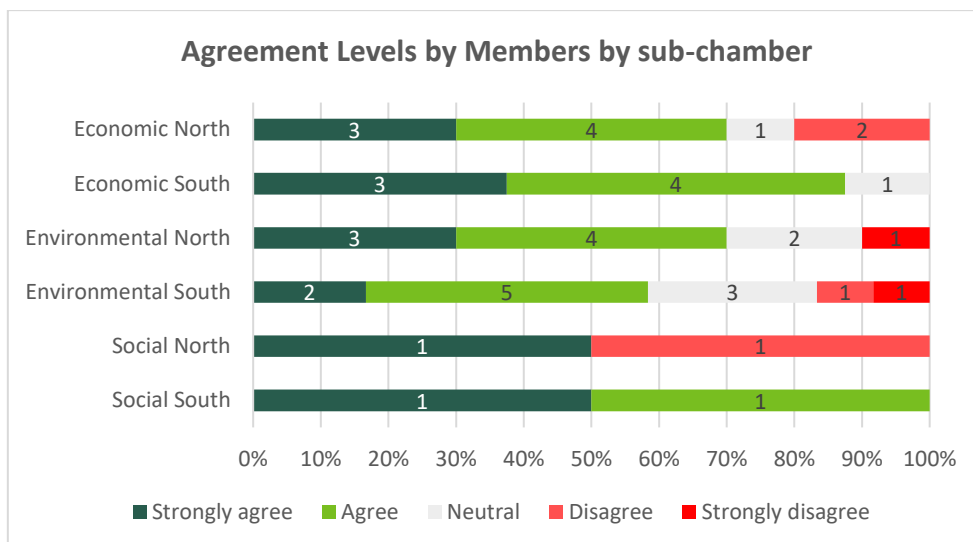


Figure 50. Agreement levels for Question 29 by sub-chamber

The question was answered by 44 FSC members across all six sub-chambers. Overall, agreement is more prevalent than disagreement across sub-chambers, although varying levels of neutrality and some disagreement are observed, notably from Social North (50%).

**Consolidated summary of discussion points from General Assembly side event on a modular approach to the PCI (Annex 1):**

1. The modular approach should balance risk and adaptability, ensuring flexibility without losing the essence of Small and Low-Intensity Managed Forests (SLIMF) differentiation.
2. It should allow for contextual adjustments across forest types, regions, and products (timber and non-timber forest products).
3. A risk-based, outcome-oriented model was favored, emphasizing flexibility, simplification, and effectiveness.
4. The new PCI could adopt a layered structure, a core module with additional modules (A, B, C...) added based on context (e.g., country, forest type, risk level).
5. The standard should remain user-friendly and accessible, enabling responsible choices and ease of use.
6. Participants stressed the need for local language accessibility, especially in countries like India, where millions of women work in Non timber Forest Products (NTFP) sectors.
7. The PCI should go beyond legal compliance, applying a risk-based and adaptive approach.
8. Participants noted challenges around rigid requirements that don't account for regional variation (e.g., differences between the U.S., Canada, and Ghana).
9. While flexibility is needed, it also complicates evaluation—participants called for balance and expertise-driven modular design.
10. Excessive control by FSC International was cited as a source of frustration, lengthening processes.
11. Every change affects local implementation differently, underscoring the need for flexibility and contextual adaptation

**Q30. To what extent do you agree that the proposed context requirements (Users, Vegetation Types, Products, Services) are sufficient to tailor the requirements? (1 – strongly disagree; 5 – strongly agree)**

**Overview:**

In total 145 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 17 respondents – 12%

**Agree:** 58 respondents – 40%

**Neutral:** 38 respondents – 26%

**Disagree:** 27 respondents – 19%

**Strongly Disagree:** 5 respondents – 3%

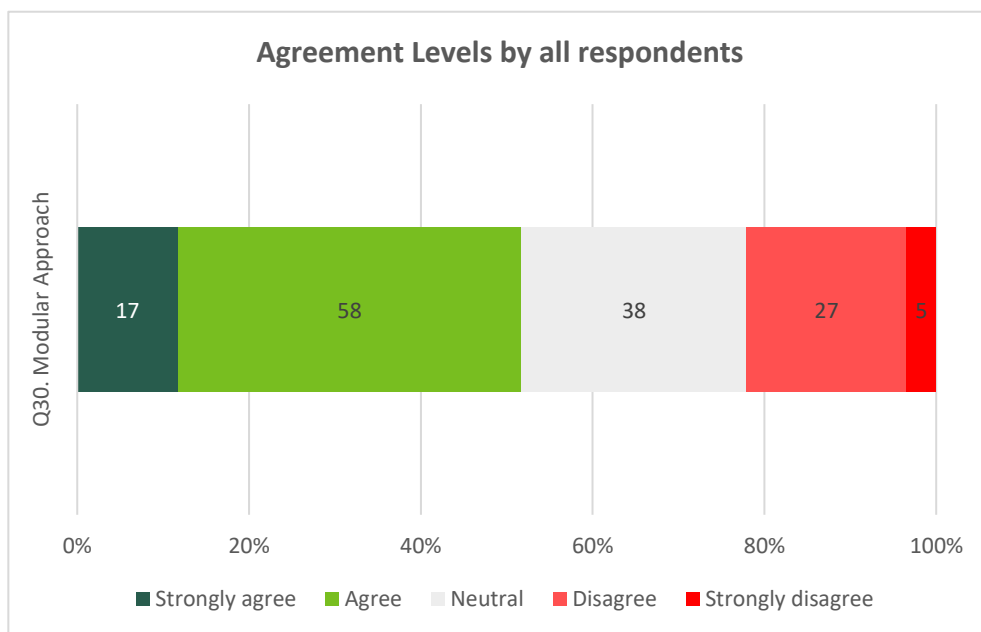


Figure 51. Agreement levels for Question 30 across all respondents

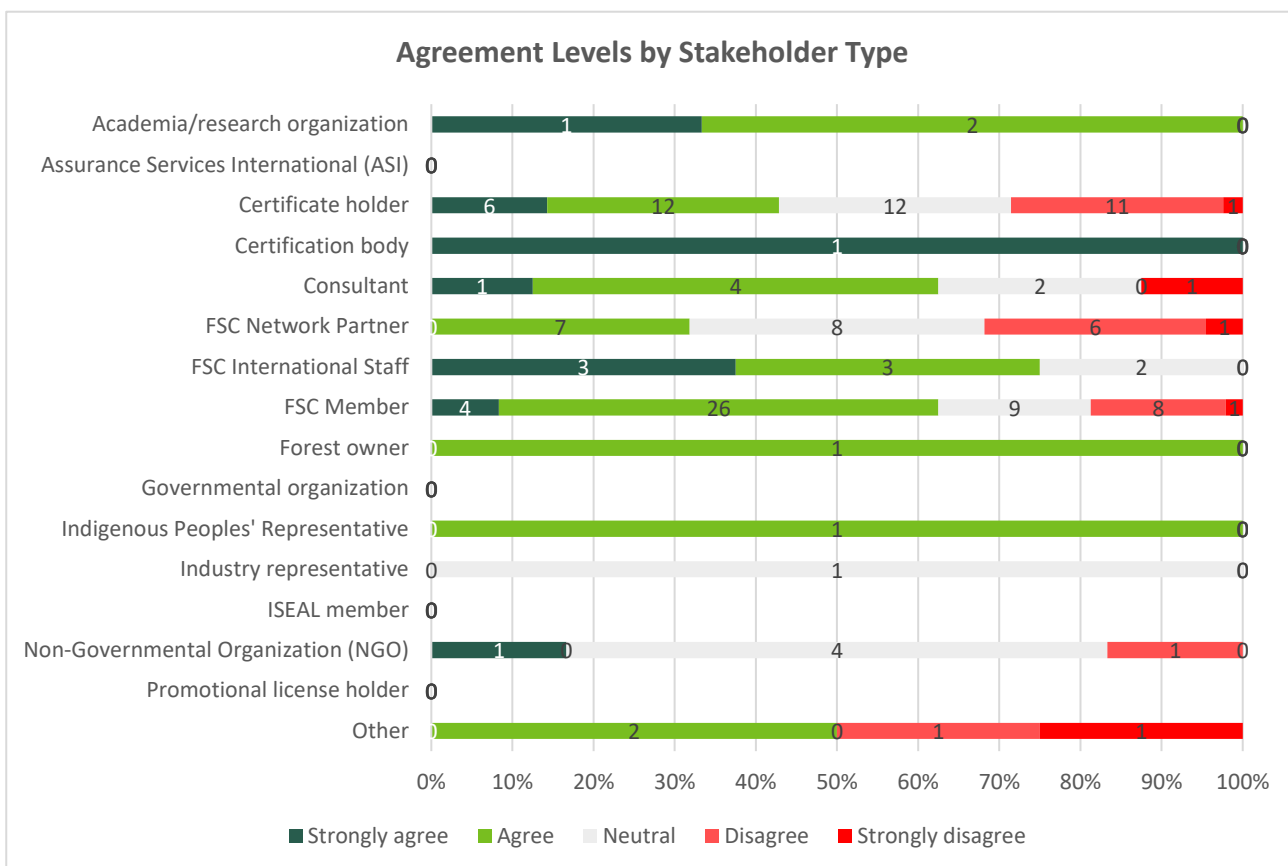


Figure 52. Agreement levels for Question 30 by stakeholder type

The question was answered by 145 respondents. The proposed context requirements (Users, Vegetation Types, Products, Services) received a divided response, with 52% agreeing or strongly agreeing, 26% remaining neutral, and 21% disagreeing. Although a slight majority agreed or strongly agreed with the proposal, there is also considerable neutrality and overall disagreement.

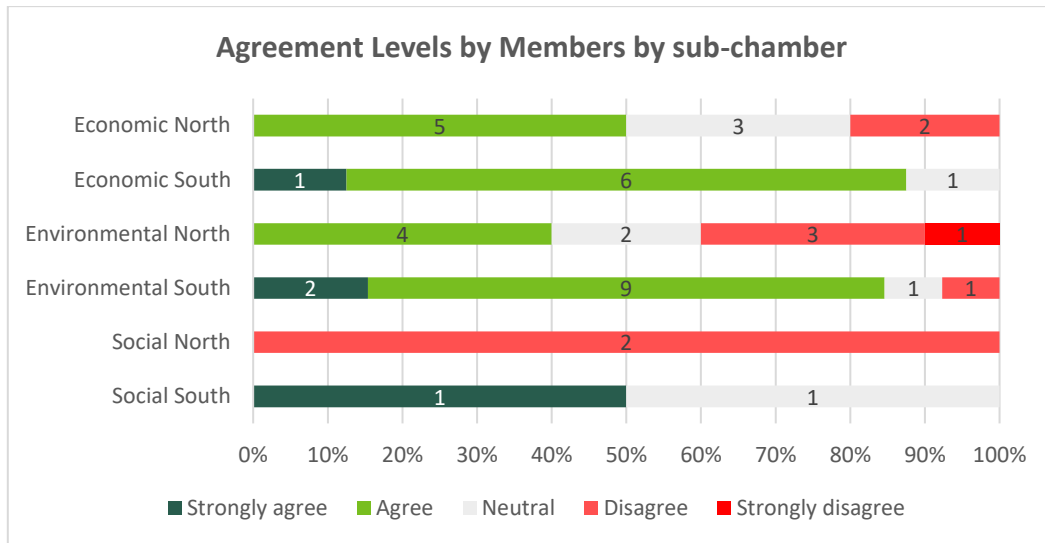


Figure 53. Agreement levels for Question 30 by sub-chamber

The question was answered by 45 FSC members across all six sub-chambers. Responses show mixed levels of support across sub-chambers, with agreement prevailing in the Environmental South and Economic South sub-chambers, while higher levels of disagreement are observed in the Environmental North and Social North sub-chambers.

**Q31. To what extent do you agree that the PCI revision should explore pre-configuring contexts at the international level, allowing local validation and adaptation while maintaining consistency? (1 – strongly disagree; 5 – strongly agree)**

**Overview:**

In total 145 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 23 respondents – 16%

**Agree:** 64 respondents – 44%

**Neutral:** 31 respondents – 21%

**Disagree:** 20 respondents – 14%

**Strongly Disagree:** 7 respondents – 5%

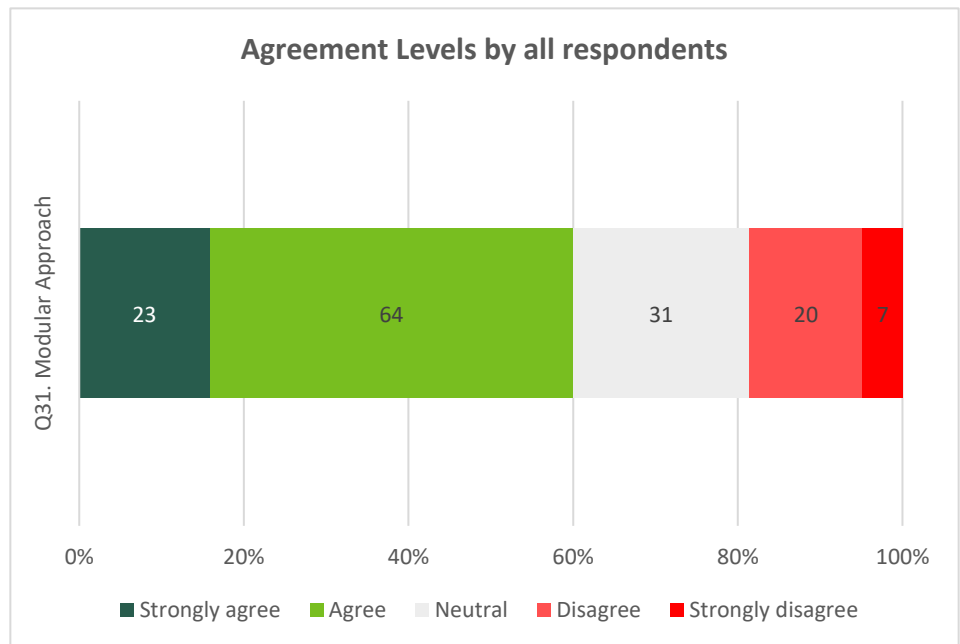


Figure 54. Agreement levels for Question 31 across all respondents

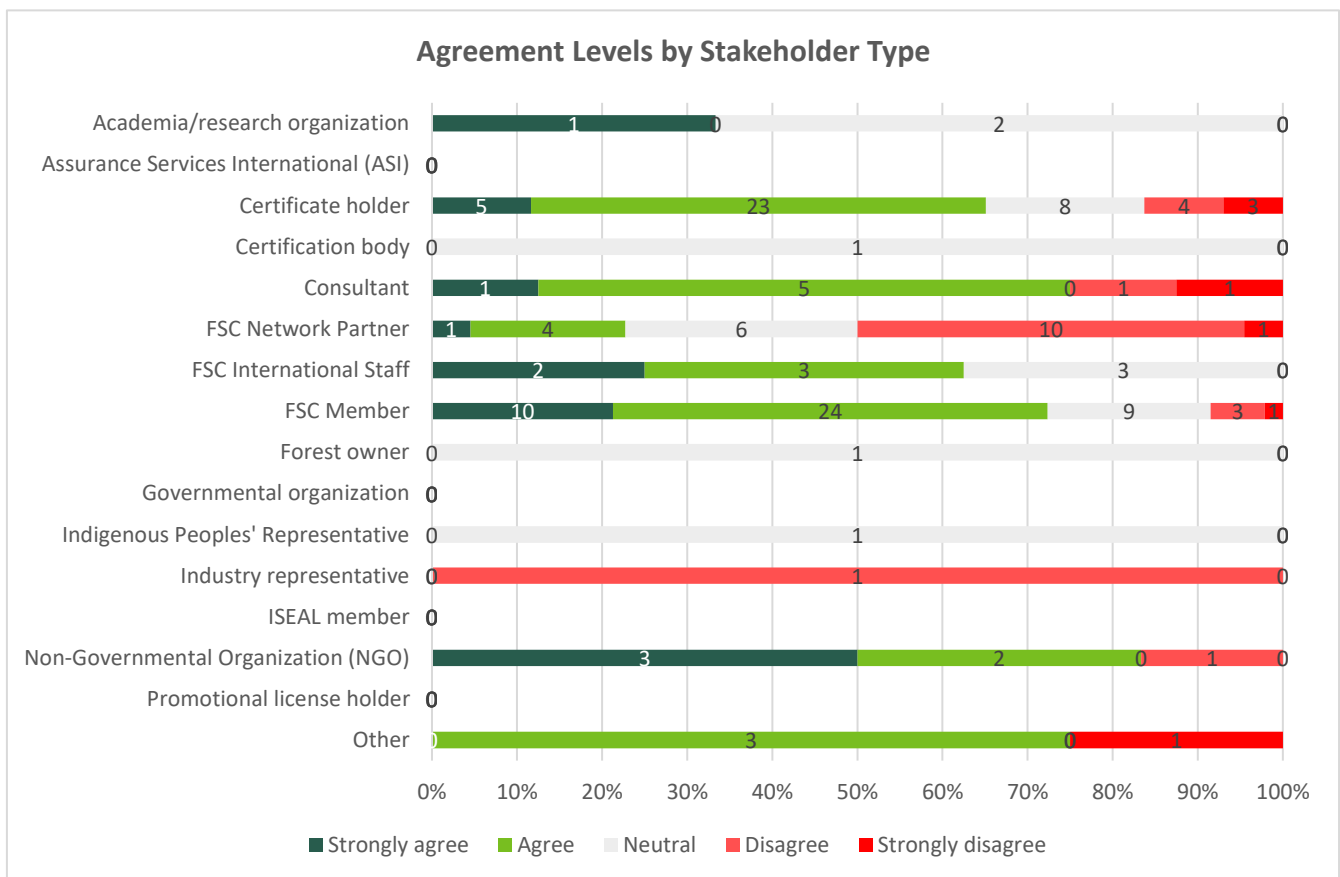


Figure 55. Agreement levels for Question 31 by stakeholder type

The question was answered by 145 respondents. The approach of pre-configuring contexts at the international level while allowing local validation received mixed but generally positive support: 60% agreed or strongly agreed, 21% were neutral, and 19% disagreed or strongly disagreed.

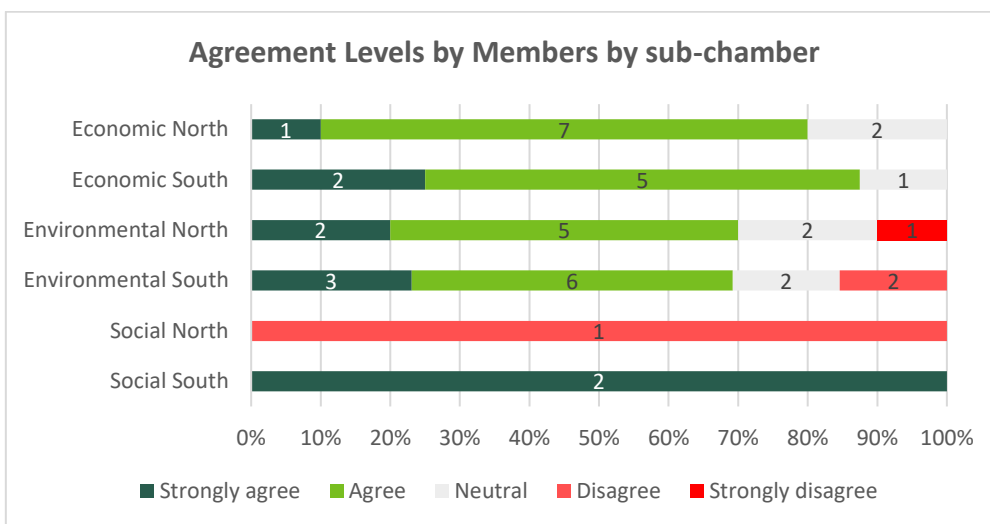


Figure 56. Agreement levels for Question 31 by sub-chamber

Overall, agreement is high (>70%), with some disagreement from the Environmental sub-chambers and from the Social North sub-chamber.

#### 6.4 Streamlining

**Q32. To what extent do you agree with reducing redundancies and repetitive content across the PCI revision process, while ensuring that the visibility and recognition of different stakeholder groups is preserved? (1 – strongly disagree; 5 – strongly agree)**

##### Overview:

In total, 146 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 88 respondents – 60%

**Agree:** 41 respondents – 28%

**Neutral:** 10 respondents – 7%

**Disagree:** 3 respondents – 2%

**Strongly Disagree:** 4 respondents – 3%

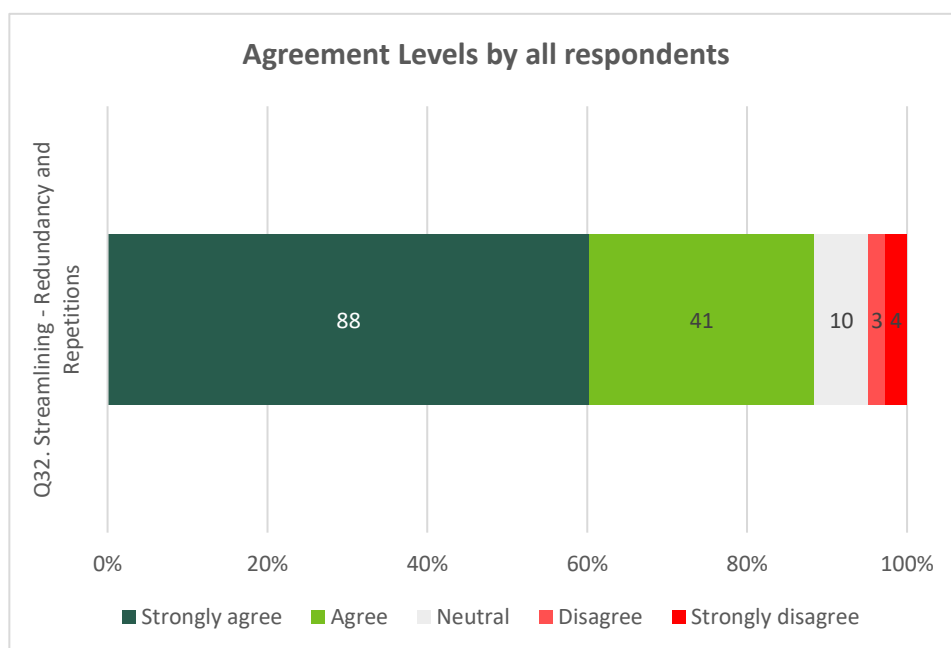


Figure 57. Agreement levels for Question 32 across all respondents

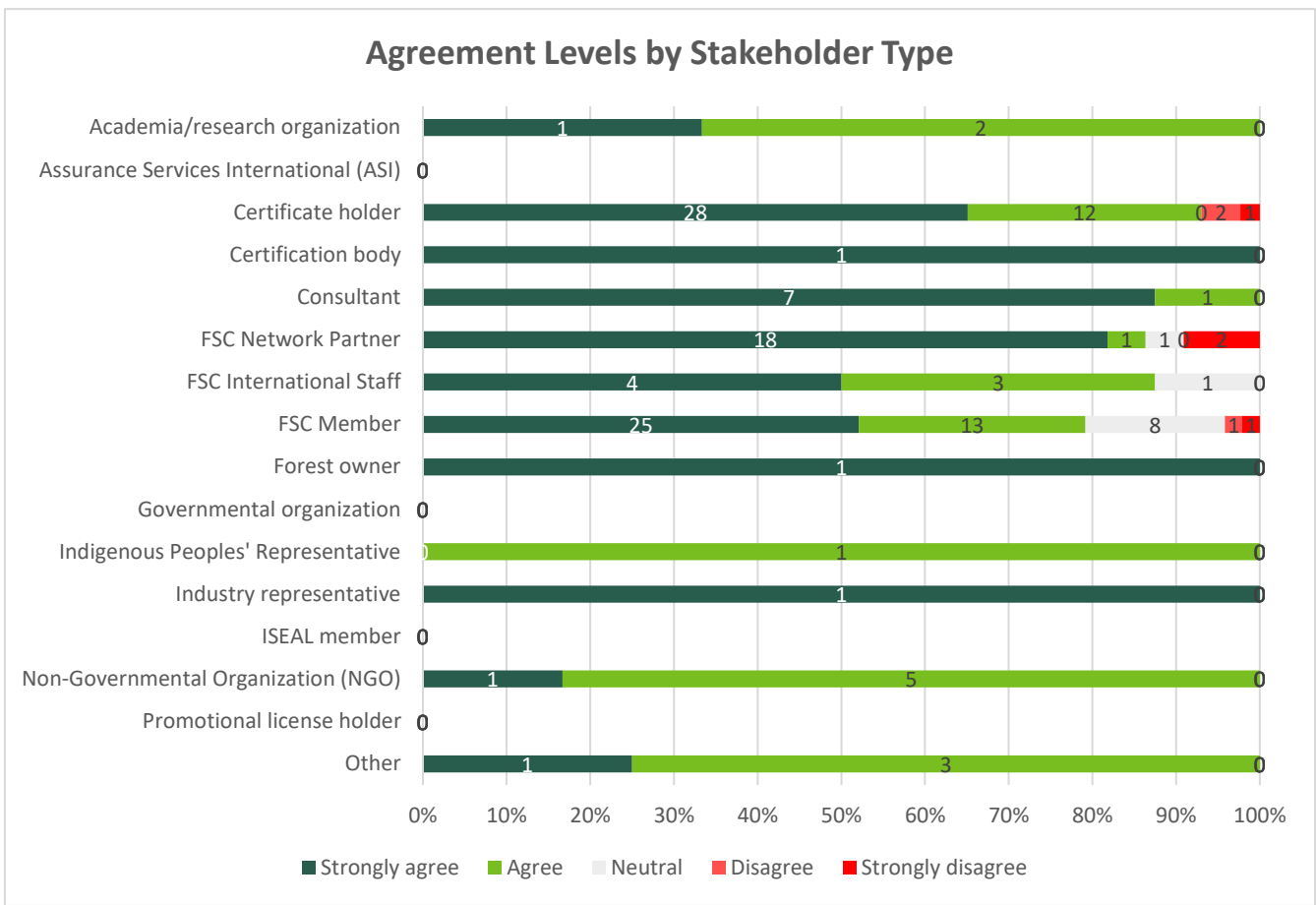


Figure 58. Agreement levels for Question 32 by stakeholder type

The question was answered by 146 respondents. The proposal to reduce redundancies and repetitive content while preserving stakeholder visibility received strong support, with 88% agreeing or strongly agreeing, while 7% remained neutral and 4% disagreed or strongly disagreed.

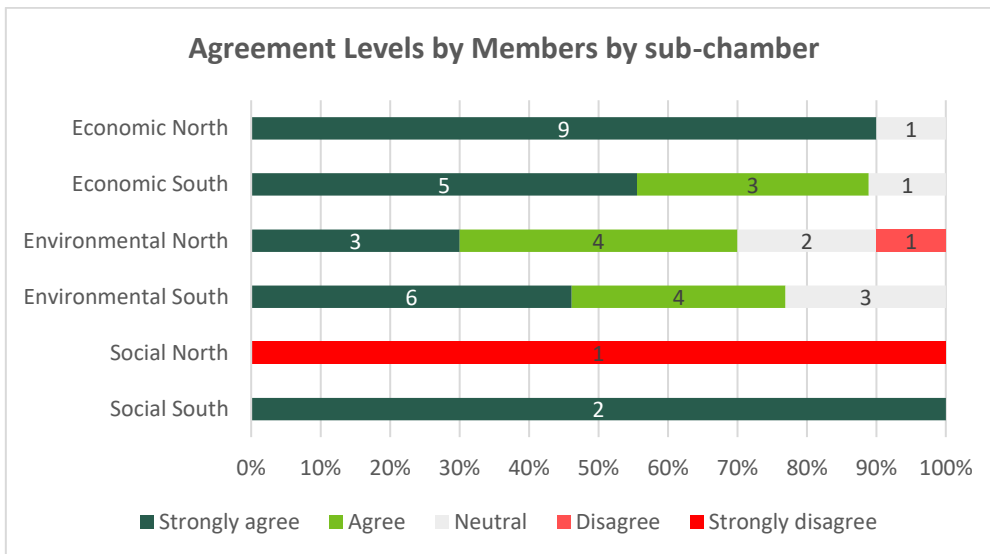


Figure 59. Agreement levels for Question 32 by sub-chamber

The question was answered by 45 FSC members across all six sub-chambers. Responses indicate high levels of agreement across most sub-chambers, with strong disagreement only from the Social North sub-chamber.

**Q33. To what extent do you agree to re-evaluate the need of each annex – including their number and structure – to avoid duplicative content across the normative framework? (1 – strongly disagree; 5 – strongly agree)**

**Overview:**

In total, 147 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 84 respondents – 57%

**Agree:** 46 respondents – 31%

**Neutral:** 11 respondents – 7%

**Disagree:** 3 respondents – 2%

**Strongly Disagree:** 3 respondents – 2%

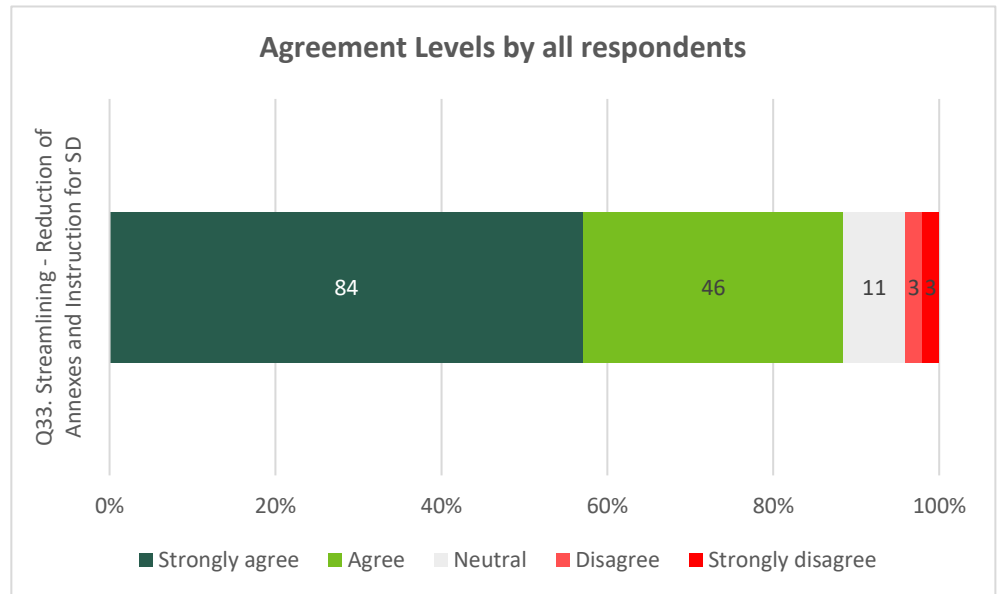


Figure 60. Agreement levels for Question 33 across all respondents

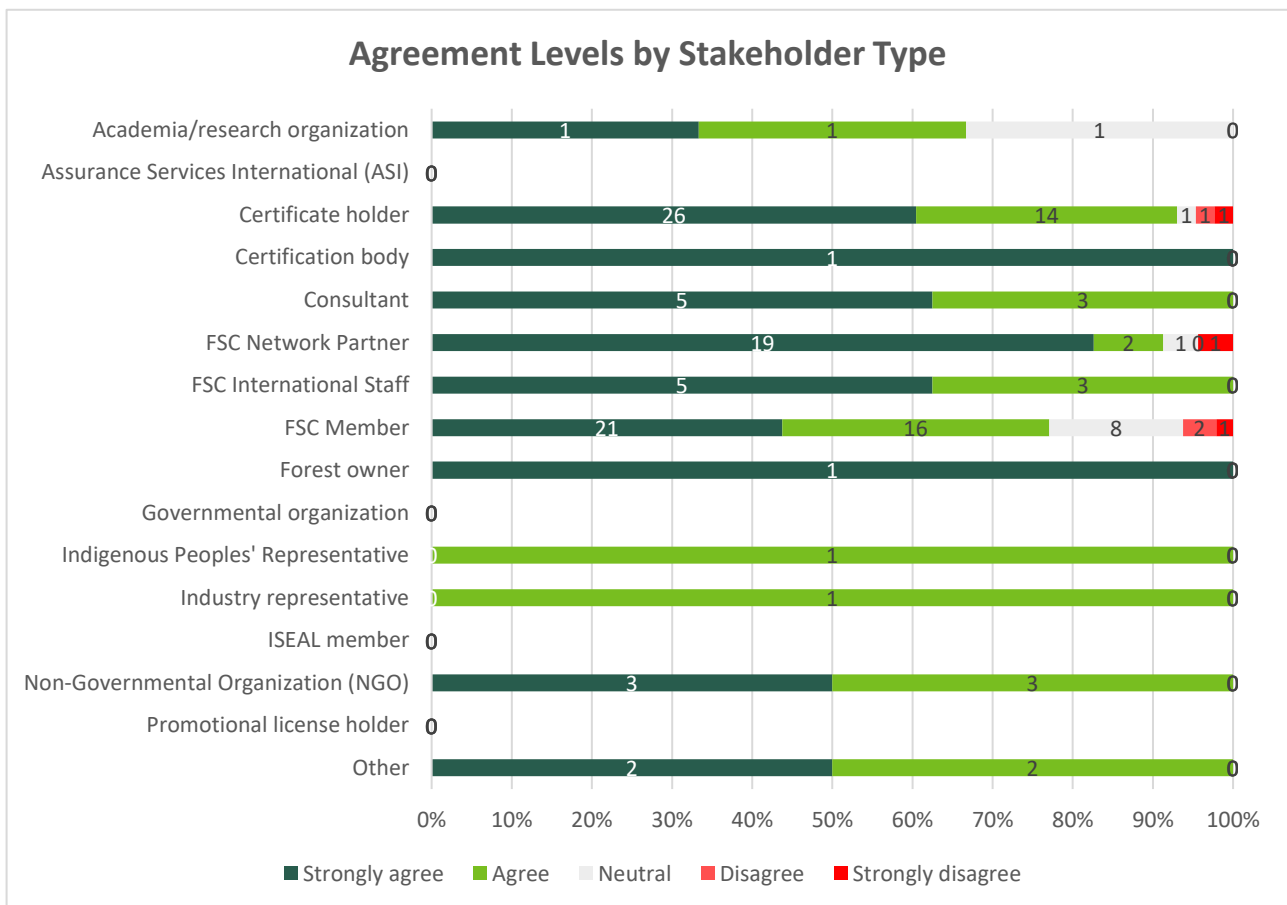


Figure 61. Agreement levels for Question 33 by stakeholder type

The question was answered by 147 respondents. The proposal to re-evaluate and potentially reduce the ten annexes in the International Generic Indicators (IGI) standard received strong support, with 88% agreeing or strongly agreeing, 7% remaining neutral, and 4% disagreeing.

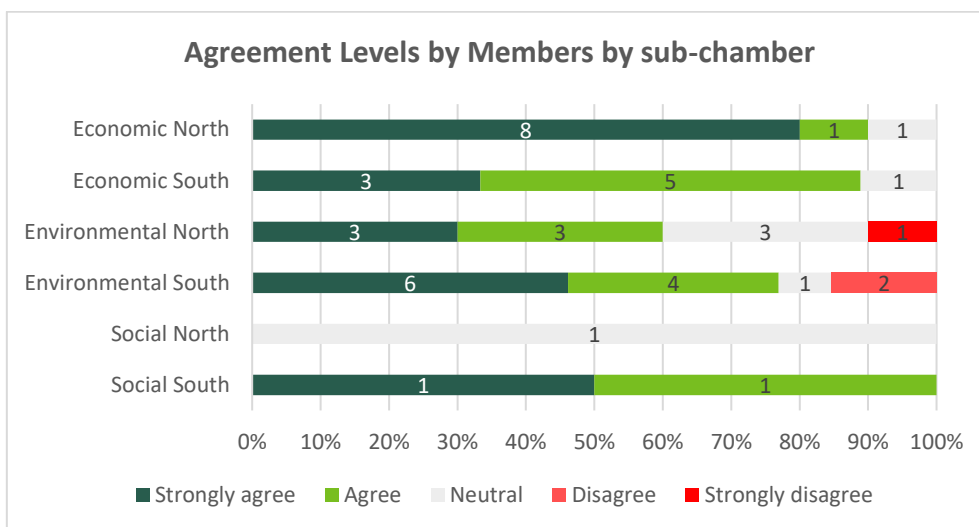


Figure 62. Agreement levels for Question 33 by sub-chamber

The question was answered by 45 FSC members across all six sub-chambers. Overall agreement is high across the Economic and Environmental sub-chambers, with some neutrality and limited disagreement observed.

### 6.5 Open feedback on user orientation

#### Q34. Do you have any additional comments, suggestions or feedback regarding this section on user orientation?

A total of 72 open feedback comments were received on this section. Stakeholders broadly support keeping the IGI as the starting point, exploring a clearer PCI structure, adopting ‘core + context building blocks’, and streamlining to cut duplication and aid audits. Conditional support hinges on explicit IGI adaptation rules, risk-based/outcome-oriented design, strong HCV visibility, no added burden (especially for Small and Low Intensity Managed Forests-SLIMF), intuitive modules, and crosswalks/field tests. Neutral views ask for clearer mapping, examples, and training; opposition prefers IGI as guidance/intent statements, a practitioner workflow, limited/optional modules, and retaining protective redundancies. A small minority rejects IGI-first, restructuring, modularity, or streamlining, mentioning risks of complexity, fragmentation, or loss of clarity.

Below is a summary of the key feedback from participants, grouped into five categories according to the degree of their support or opposition to the proposal.

Categories of Comments	Summary of Comments
<b>Strong support (no substantive conditions)</b>	Regarding the purpose of the IGI, some stakeholders confirm that the IGI should remain the starting point to ensure global consistency and comparability, as well as to offer a practical template where capacity is limited. The IGI is seen as a guardrail against the weakening of global standards. On the proposed new structure of the PCI, stakeholders strongly support restructuring to reduce redundancies, improve clarity for users, and modernize language; they expect simpler navigation and stronger audit consistency.

**Categories of Comments****Summary of Comments**

Regarding a modular approach, stakeholders see 'core + context' modules as a way to reflect diversity while limiting arbitrary cross-country differences; some propose a universal core with context add-ons for users/vegetation/services. For streamlining, some respondents strongly support reducing redundancies for clarity and audit consistency; they also support a systematic review of the annexes to remove overlaps and simplify structure, while improving definitions/thresholds.

**Support, but with conditions / improvements requested**

Regarding the purpose of the IGI, for many stakeholders their support depends on explicitly confirming that Standard Developers can adopt/adapt/drop/add indicators, and that IGI are not 'defaults'. Stakeholders want risk-based and outcome-oriented adaptation pathways that are workable in practice.

On the proposed new structure of the PCI, some respondents requested to keep HCVs highly visible, distinguish intended outcomes from practices, field-test drafts, provide transition mapping, and to ensure no net new burden for certificate holders (especially SLIMF). Several recommend a practitioner workflow (assess → plan → permissions/consultation → operate → monitor/learn).

Regarding a modular approach, some stakeholders provided conditional support for the modular approach proposal. They will only support this if it reduces certificate holders' burden (especially for SLIMF), avoids rigid top-down pre-configuration/contextualization, and ensures national flexibility; they request intuitive implementation (e.g., clear parameters auto-selecting applicable indicators) and caps to avoid having too many indicators.

Many stakeholders support streamlining the PCI, provided it does not weaken stakeholder visibility and preserves operational guidance, traceability, and a clear normative/guidance distinction. They further recommend consolidating fragmented normative content within the Forest Stewardship Standards (FSS) to improve clarity and usability.

**Neutral / abstain / unclear**

Regarding the purpose of the IGI, a few stakeholders ask what 'starting point' means in practice or simply request clearer mapping of the normative framework before deciding.

On the proposed new structure of the PCI, a few stakeholders note that the concept is hard to follow; they ask for clearer examples, crosswalks, and training materials before judging.

Regarding a modular approach, several stakeholders say it is hard to understand, and want concrete, worked examples before supporting it.

For streamlining, some comments request practical crosswalks, examples, and training materials before judging impacts.

**Opposition with alternative proposal / approach**

Regarding the purpose of the IGI, some stakeholders argue that the IGI should be guidance/examples only or propose intent statements per criterion instead of IGI, leaving Standard Developers to design indicators against outcome intent.

On the proposed new structure of the PCI, stakeholders who opposed the proposal find the sample structure confusing or insufficiently user-centric;

Categories of Comments	Summary of Comments
<b>Strong opposition or rejection</b>	<p>some propose keeping current principles but reorganizing content or adopting step-by-step practitioner logic instead of thematic consolidation.</p> <p>Regarding a modular approach, some stakeholders fear ‘certification à la carte’, fragmentation, indicator bloat, and a ballooning workload for complex countries; they suggest modularity be optional or reserved for limited strategic topics (e.g., urban forests, non-timber forest products- NTFPs).</p> <p>For streamlining, some stakeholders argue that a few redundancies are good (risk management) or warn that combining grievance mechanisms may reduce effectiveness for specific stakeholder groups; they prefer keeping certain annexes/guidance to avoid interpretive gaps.</p> <hr/> <p>Regarding the purpose of the IGI, very few stakeholders reject the IGI-first approach, insisting that rules be developed only at the country level.</p> <p>For the proposed new structure of the PCI, very few stakeholders oppose the restructuring (e.g., by citing redundancies or conflicts among principles), fearing increased complexity and a loss of clarity.</p> <p>Regarding a modular approach, a few respondents reject modularity outright, arguing it will increase complexity and blur distinctions (e.g., plantation vs. natural forest).</p> <p>Regarding streamlining, very few stakeholders reject streamlining entirely, claiming it risks oversimplification or distortion.</p>

*Table 6. Summary of qualitative feedback on user orientation*

## 7. Policy on Excision

This section consulted on integrating the Policy on Excision into the PCI and related normative documents. The proposal received moderate to high support, with agreement outweighing disagreement overall, while neutrality remains visible. FSC membership sub-chamber results show higher support in Environmental and Social chambers and more mixed views in Economic chambers – a pattern also reflected in stakeholder-type results. Open feedback emphasizes the importance of maintaining safeguards, transparency, and clear allocation of responsibilities.

### 7.1 Policy on Excision

**Q35. Do you support the proposal to integrate the requirements of the Policy on Excision into the related normative documents specifically directed at various user groups as proposed above? (Under this proposed integration pathway, the current Policy would be withdrawn once its core elements are fully integrated into these normative documents, thereby streamlining FSC’s overall normative framework.) (Yes, I fully support the proposal / No, I do not support the proposal)**

#### Overview:

In total 137 out of 186 respondents answered this question.

An outline of the results shows that:

**Yes, I fully support the proposal:** 107 respondents – 78%

**No, I do not support the proposal:** 30 respondents – 22%

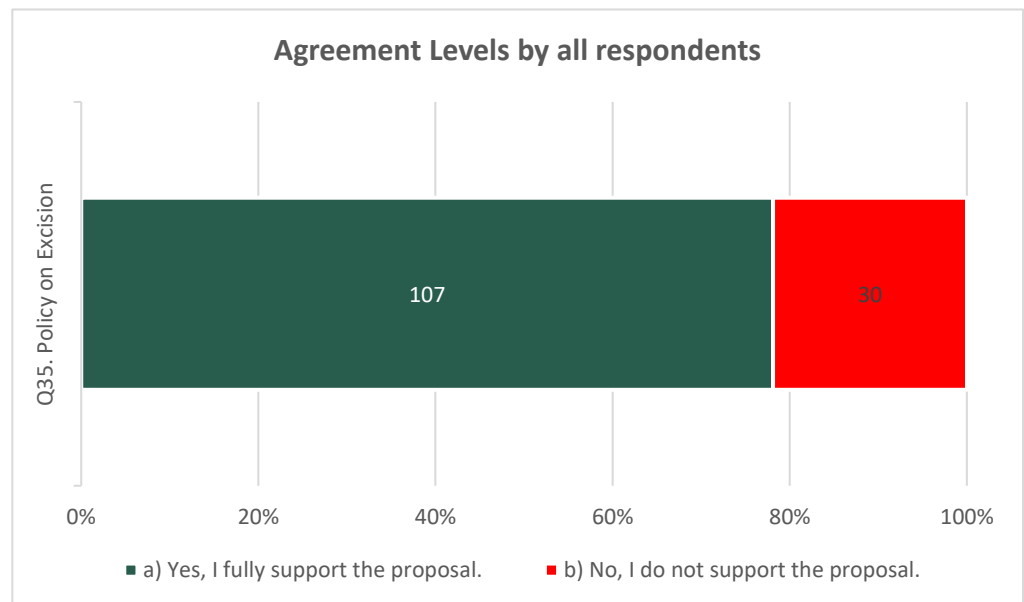


Figure 63. Agreement levels for Question 35 across all respondents

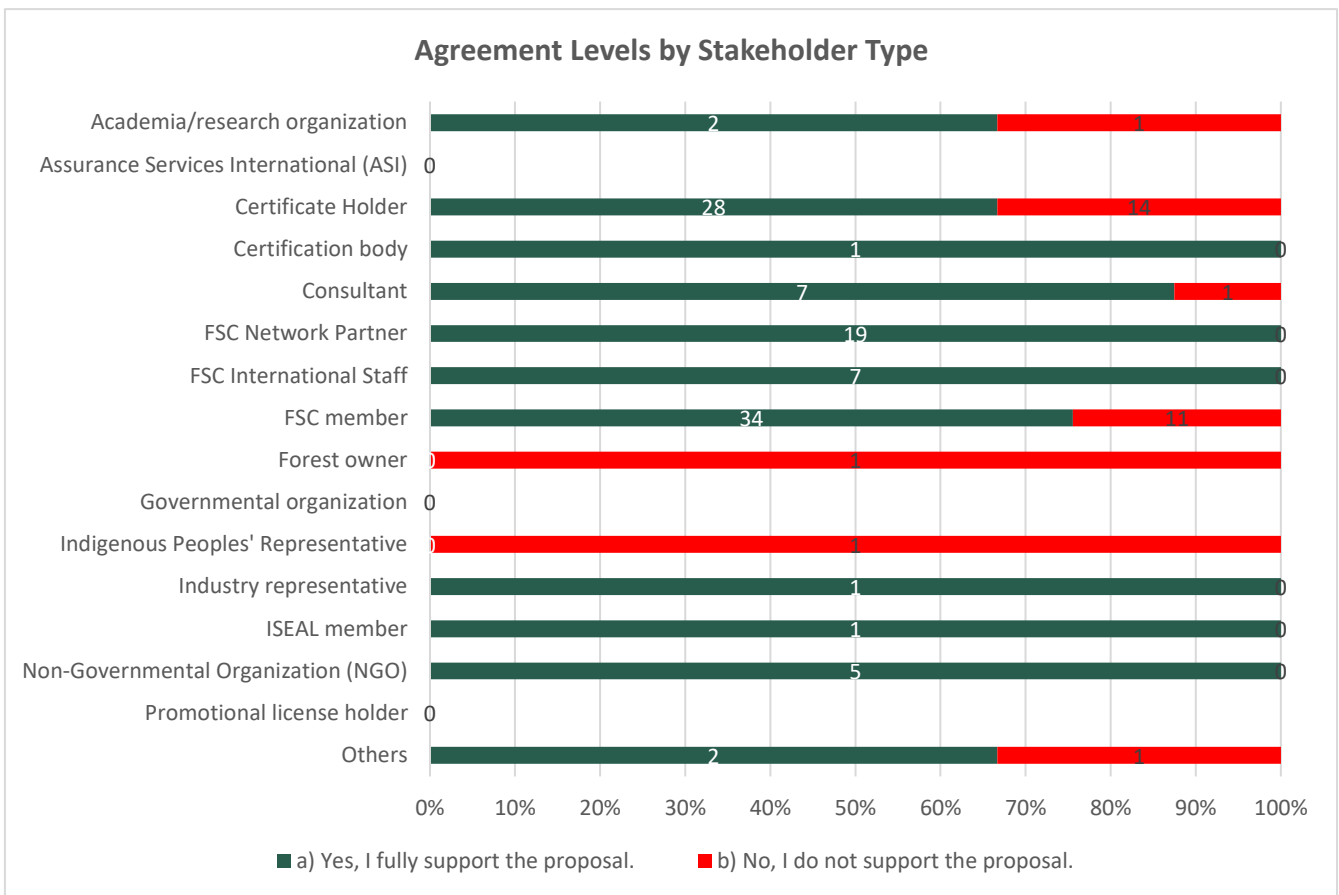


Figure 64. Agreement levels for Question 35 by stakeholder type

The question was answered by 137 respondents. The proposal to integrate the Policy on Excision into user-specific normative documents and withdraw the stand-alone policy received strong majority support with 78% in favour, and opposition from 22% of respondents.

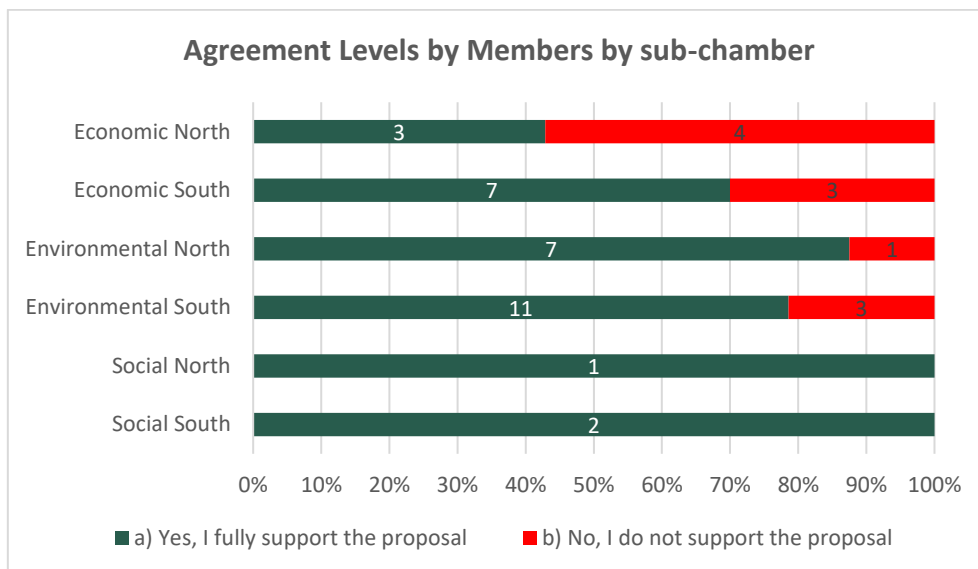


Figure 65. Agreement levels for Question 35 by sub-chamber

The question was answered by 42 FSC members across all six sub-chambers. Overall, support for the proposal is evident across sub-chambers, although levels of support vary, with comparatively lower support observed in the Economic North sub-chamber.

## 7.2 Open feedback on the Policy on Excision

### Q36. Do you have any additional comments, suggestions or feedback regarding the section on the Policy on Excision?

A total of 56 open feedback comments were received on this section. Most stakeholders support integrating excision requirements into the relevant normative documents to streamline use, reduce duplication, and minimize subjective interpretation during audits. Conditional supporters ask for clear rules and thresholds, anti-loophole safeguards, and strong transparency/traceability, with proportionate consultation and guidance for tricky cases (e.g., lease expiry, government re-allocation, wind infrastructure, hard-to-map areas). Neutral views reflect the topic's complexity and request clearer definitions of what counts as excision and where conditions would sit. The opposition centers on keeping a stand-alone policy to avoid fragmentation and unintended burden, while a small minority warns of credibility/greenwashing risks if integration weakens controls.

Below is a summary of key feedback from participants, grouped into five categories according to the degree of their support or opposition to the proposal.

Categories of Comments	Summary of Comments
<b>Strong support</b>	Some stakeholders welcome moving excision requirements into the right places (e.g., in the PCI for certificate holders; certification body standard for auditors; procedures for Standard Developers), saying this will cut duplication, improve access, and reduce inconsistent interpretations. They want clear, objective text to avoid audit-by-opinion (e.g., several 'Yes' comments support integration for usability and coherence).
<b>Support, but with conditions / improvements requested</b>	More than one third of the respondents support the proposal with certain conditional safeguards and design clarity, with recurring themes being, for example: (1) clarity/objectivity to avoid inconsistent auditor interpretation (clear thresholds, definitions, and decision rules); (2) anti-loophole guardrails so excision cannot be used to bypass core FSC requirements (e.g., conversion rules, FPIC, rights violations), plus stronger verification; (3) transparency and traceability (mapping boundaries, public disclosure of rationale, time-bound review of excised areas, ensuring products from excised areas are excluded from FSC claims); (4) smarter consultation triggers – stakeholder consultation is supported when excision has material stakeholder impacts, but some ask to avoid consultation for purely contractual scope changes (e.g., lease not renewed); (5) practical scenario handling (e.g., wind infrastructure inside forest landscapes; difficulty physically delimiting excised areas; plantations v natural forests; clarifying whether 'non-certified areas inside Management Unit (MU) boundaries' are automatically 'excised'; alignment with existing traceability clauses).
<b>Neutral / abstain / unclear</b>	A few respondents struggle with binary choice framing ('it depends'), describe the topic as complex, or request clarification (e.g., what exactly counts as excision vs other 'non-certified areas', and what conditions should apply). Some comments are effectively abstentions or signal that the proposal needs a clearer explanation of consequences before a firm position is possible.
<b>Opposition with alternative</b>	Some respondents' opposition to the proposal is generally not against revision, but against withdrawing the stand-alone policy or against the way integration is

Categories of Comments	Summary of Comments
<b>proposal / approach</b>	<p>designed. Major clusters: (1) “Keep it standalone” – excision is seen as a distinct policy area needing a clear, comprehensive single reference (especially because it concerns management process changes, not only technical scope); (2) risk of fragmentation – integrating clauses into multiple documents may make requirements harder to find, increasing uncertainty; (3) concern about ‘transfer v change’ – several object that the proposal appears to strengthen or expand requirements (citing the consultation examples) without sufficient justification and potentially increasing burden; (4) modularity/exceptionalism – suggesting excision requirements apply only when excision occurs (modular approach), rather than reshaping core PCI; (5) national adaptation/exceptional contexts – calls to allow FSS-level adaptation (and references to exceptional national circumstances like armed conflict) and concern that uncertainty has already harmed uptake in some contexts.</p>
<b>Strong opposition or rejection</b>	<p>Very few respondents framed the proposal as fundamentally undermining FSC credibility – characterizing integration/withdrawal as enabling evasion of FSC controls (e.g., ‘greenwashing’ framing) and posing reputational risk.</p>

*Table 7. Summary of qualitative feedback on the Policy on Excision*

## 8. Alignment of FSC's Normative Framework

This section addresses alignment and streamlining of FSC's normative framework, including Advice Notes, Interpretations, and the Glossary of Terms. Responses indicate very high support, with strong agreement and negligible disagreement across stakeholder types and FSC membership sub-chambers. Open feedback strongly supports consolidation, reduced fragmentation, and a clearer hierarchy and purpose of normative instruments.

### 8.1 Advice Notes and Interpretations

**Q37. To what extent do you agree with the proposal to consider these three defined scenarios (Withdraw, Retain, Integrate) during the PCI revision process for all Advice Notes in FSC-DIR-20-007 and Interpretations on Forest Management as part of the PCI revision process for better alignment, streamlining and user-friendliness within FSC's Normative Framework? (1 – strongly disagree; 5 – strongly agree)**

#### Overview:

In total, 144 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 42 respondents – 29%

**Agree:** 74 respondents – 51%

**Neutral:** 25 respondents – 17%

**Disagree:** 1 respondent – 1%

**Strongly Disagree:** 2 respondents – 1%

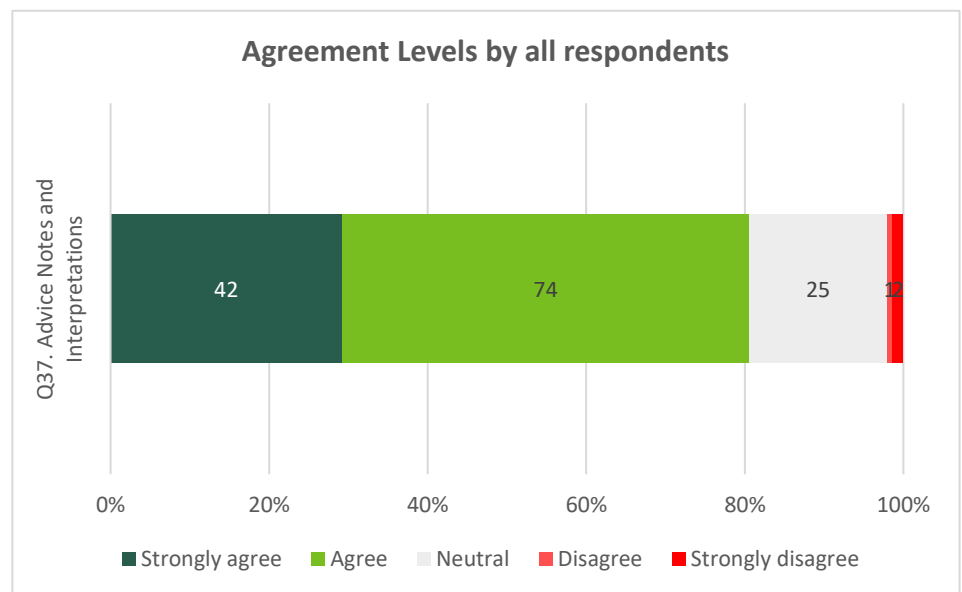


Figure 66. Agreement levels for Question 37 across all respondents

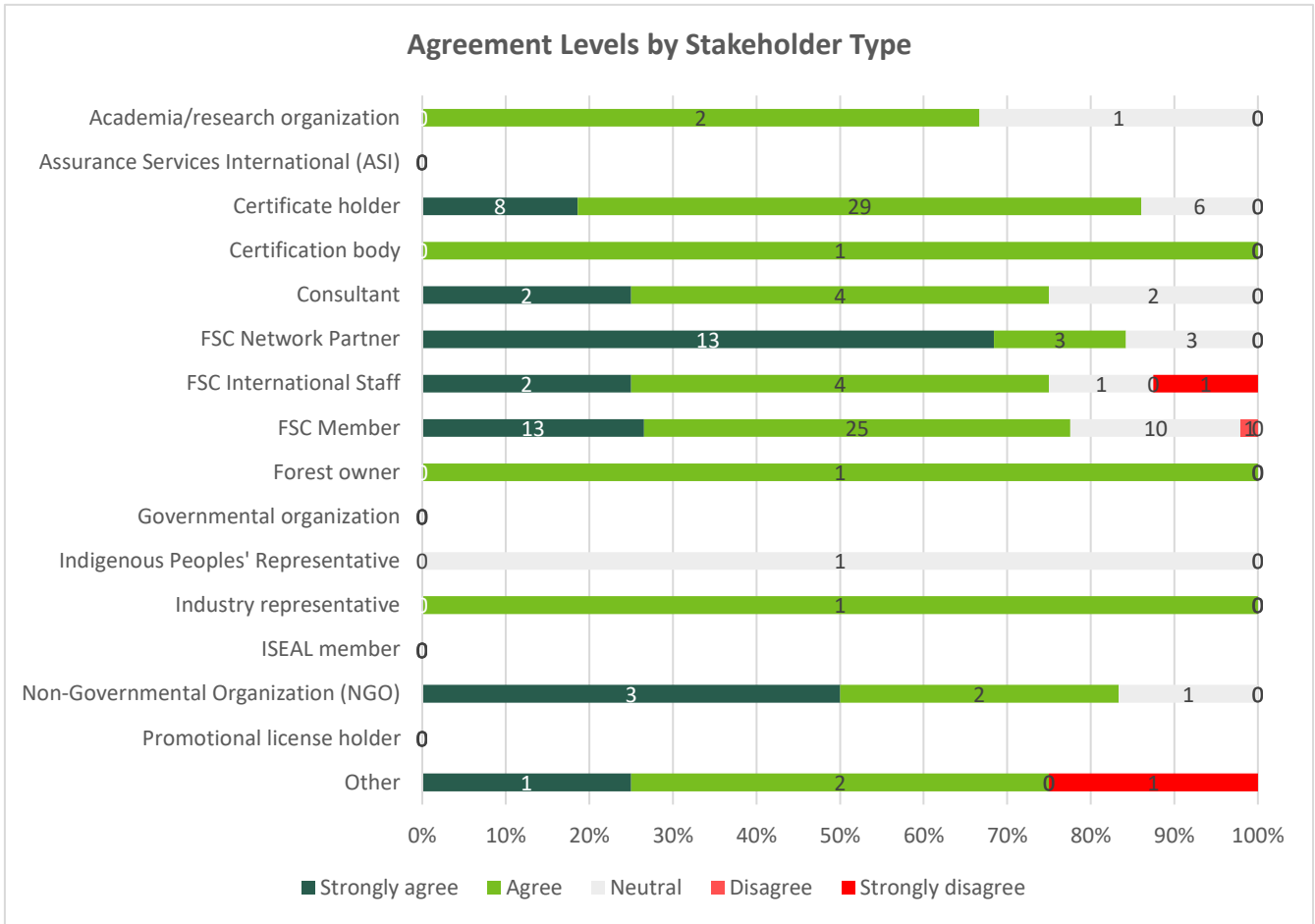


Figure 67. Agreement levels for Question 37 by stakeholder type

The question was answered by 144 respondents. The majority of the stakeholders agree or strongly agree with the proposed scenarios: overall agreement stands at 80%, neutrality at 17%, and overall disagreement at 2%.

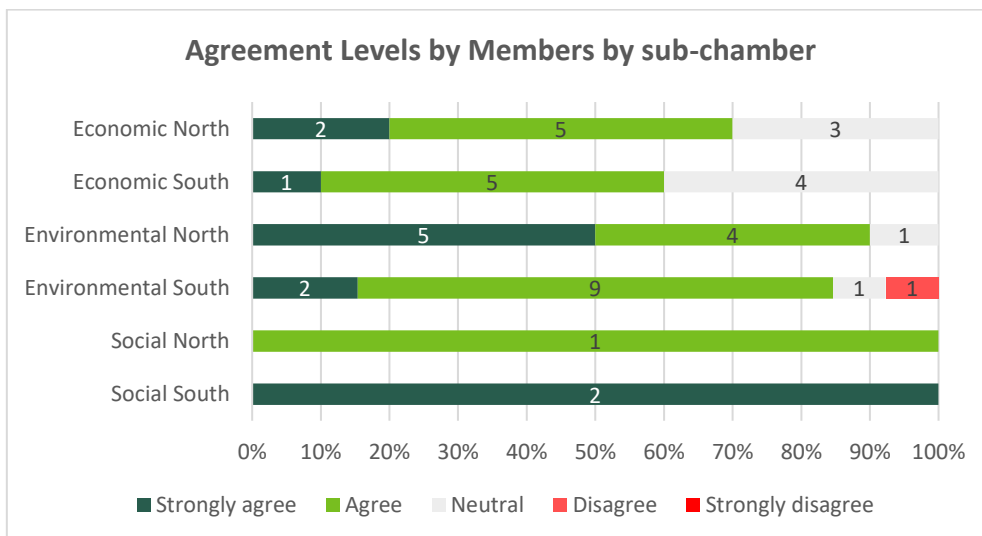


Figure 68. Agreement levels for Question 37 by sub-chamber

The question was answered by 46 FSC members across all six sub-chambers. Responses indicate broadly positive levels of agreement across sub-chambers, with very low disagreement.

## 8.2 Glossary of Terms section

**Q38. To what extent do you agree to review the Glossary of Terms in PCI documents to promote alignment and consistent use of language? (1 – strongly disagree; 5 – strongly agree)**

### Overview:

In total, 144 out of 186 respondents answered this question.

An outline of the results shows that:

**Strongly Agree:** 80 respondents – 56%

**Agree:** 51 respondents – 35%

**Neutral:** 10 respondents – 7%

**Disagree:** 2 respondents – 1%

**Strongly Disagree:** 1 respondent – 1%

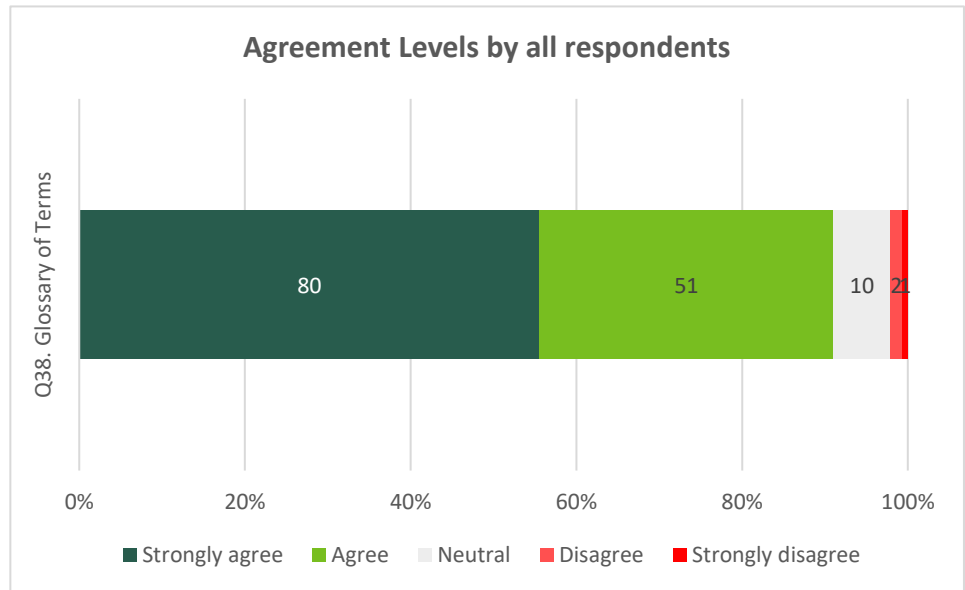


Figure 69. Agreement levels for Question 38 across all respondents

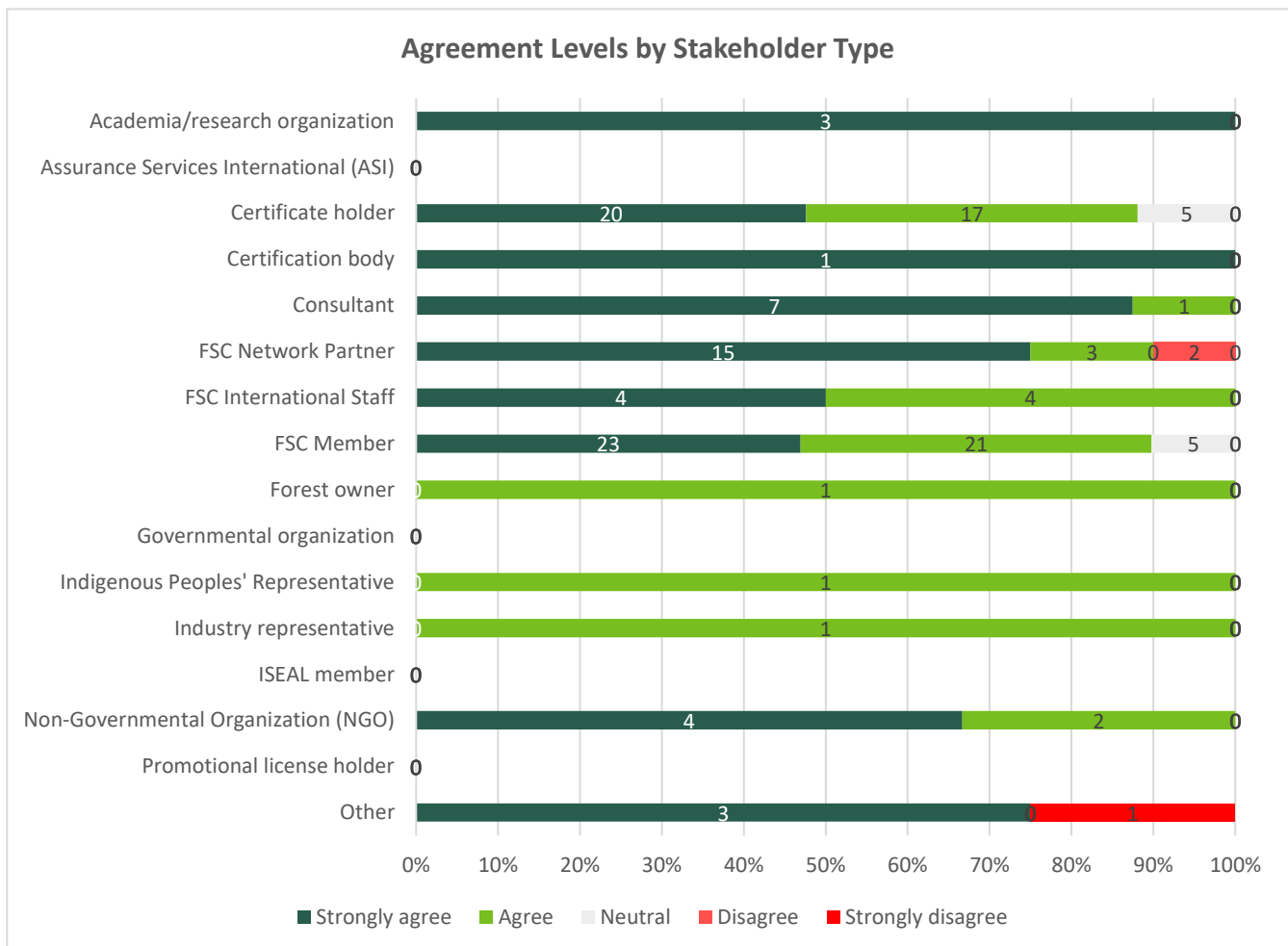


Figure 70. Agreement levels for Question 38 by stakeholder type

The question was answered by 144 respondents. The majority of the stakeholders support the review of the Glossary of Terms in PCI documents. The overall agreement is 91%, while there is 1% overall disagreement.

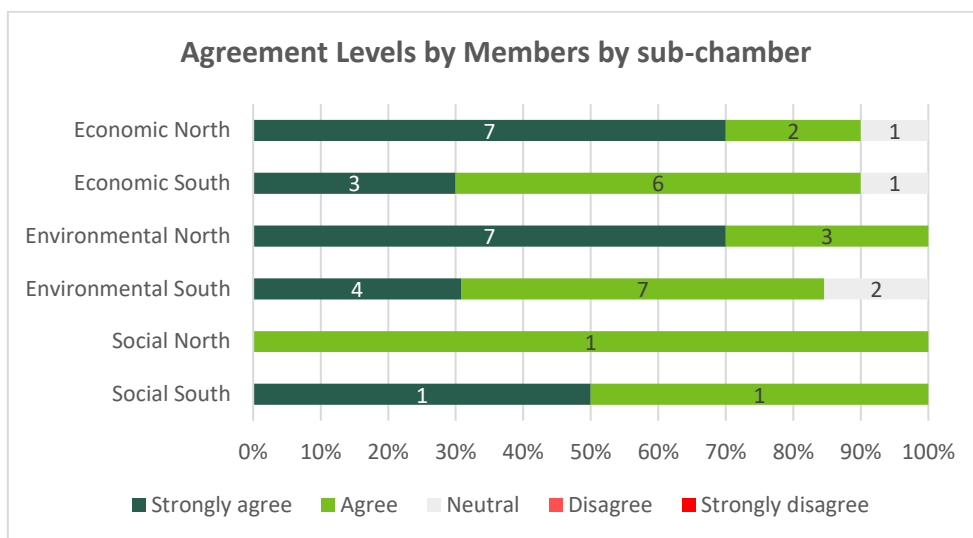


Figure 71. Agreement levels for Question 38 by sub-chamber

The question was answered by 46 FSC members across all six sub-chambers. Agreement is high and consistent across the Economic, Environmental, and Social sub-chambers, with no disagreement.

### 8.3 Open feedback on Alignment of FSC’s Normative Framework

#### Q39. Do you have any additional comments, suggestions or feedback regarding the section on the Advice Notes for FSC Forest Management Evaluations, Forest Management Interpretations and PCI’s Glossary of Terms?

The analysis of 61 stakeholder responses to Question 39 reveals a strong and broad consensus in favour of rationalizing the Advice Notes and revising the Glossary of Terms. For 8.1, they favour a flexible, documented application of Integrate/Withdraw/Retain to reduce fragmentation and improve user orientation; for 8.2, they call for a centralized, translatable, plain-language glossary with clear national adaptation rules and credible sector sources. The main conditions focus on transparency, cross-language congruence, burden reduction, and periodic updates. The opposition centers on retaining the status quo or limiting changes to a few problematic terms.

Below is a summary of key feedback from participants, grouped into five categories according to the degree of their support or opposition to the proposal.

Categories of Comments	Summary of Comments
<b>Strong support</b>	One third of the stakeholders welcome the flexible 3-scenario approach to streamline and consolidate Advice Notes/Interpretations, integrate non-redundant content, withdraw obsolete content, and retain only what is still needed (temporarily or permanently). Many ask for a public record of decisions to improve user orientation and audit consistency. A strong endorsement for a comprehensive glossary revision to fix long-standing ambiguities (especially ‘conservation’ vs. ‘protection’), ensure plain language, and improve cross-language consistency (EN/FR/ES). Calls for a centralized, live glossary and clearer definitions of operational terms (e.g., ‘maintenance’ of values).

Categories of Comments	Summary of Comments
<b>Support with some feedback or concerns</b>	<p>In relation to Advice Notes and Interpretations, many respondents support with guardrails: (1) keeping transparency (publishing changes made); (2) providing clear pointers to where guidance is retained; (3) phasing changes cautiously; (4) ensuring plain language and short sentences; (5) avoiding burden – especially for SLIMF – while rationalizing the normative sprawl. Some respondents indicated conditional support with respect to the revision of the Glossary of Terms, including: (1) prioritizing translatability; (2) preferring one international glossary (e.g., FSC-STD-01-002) or a single online source; (3) clarifying national adaptation rules (which terms are core v adaptable), and some want no redefinitions nationally, while others suggest treating the glossary like IGI (a starting point); (4) citing credible sector sources (The International Union of Forest Research Organizations-IUFRO, Food and Agriculture Organization-FAO, Society for Ecological Restoration-SER) rather than generic dictionaries; (5) considering annual updates focused on problematic terms first.</p>
<b>Neutral / unclear / caution</b>	<p>A few respondents indicate they cannot meaningfully answer without seeing specific Advice Notes/Interpretations or draft glossary edits. They express caution and request clearer rationale or evidence (e.g., whether certain term distinctions have caused real implementation problems). Some provide minimal or non-specific responses (“no”, “done with caution”).</p>
<b>Opposition to the alternative proposal / approach</b>	<p>Very few respondents prefer a retain-first stance or keeping certain Advice Notes standalone until the PCI revision is finished; they question whether the 3-scenario approach really solves implementation issues; they propose focusing only on problematic areas rather than reworking many notes at once. With respect to the Glossary of Terms, some stakeholders are sceptical about revisiting many definitions at once; they suggest using a limited glossary refresh targeting known problematic terms or relying on an umbrella outcomes/human-rights framing instead of detailed changes of definitions; question whether distinguishing ‘conservation’ from ‘protection’ addresses real audit problems.</p>
<b>Strong opposition or rejection</b>	<p>Very few respondents reject further revision (“no more changes”) or object to the 3-scenario approach altogether, preferring the status quo with respect to the proposal on Advice Notes and Interpretations. Some stakeholders also strongly reject the proposal of glossary review (e.g., “do not change definitions”) or insist that continued multiple glossaries are acceptable despite inconsistency.</p>

Table 8. Summary of qualitative feedback on Alignment of FSC’s Normative Framework

## 9. Genetically Modified Organisms

This section consulted on maintaining the current prohibition on genetically modified organisms in FSC-certified forests. The proposal received overwhelming support, with near-unanimous agreement across stakeholder types and FSC membership sub-chambers and no meaningful disagreement. Open feedback confirms a strong consensus in favour of maintaining the prohibition.

### 9.1 Genetically Modified Organisms (GMOs)

**Q40. Do you support revising the definition of 'GMO' to ensure that the original intention of the requirement is maintained (to prevent the use of GMOs in ways that could compromise natural forest dynamics or ecosystem resilience)? (Yes / No)**

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#### Overview:

In total, 130 out of 186 respondents answered this question.

An outline of the results shows that:

**Yes:** 100 respondents  
– 77%

**No:** 30 respondents –  
23%

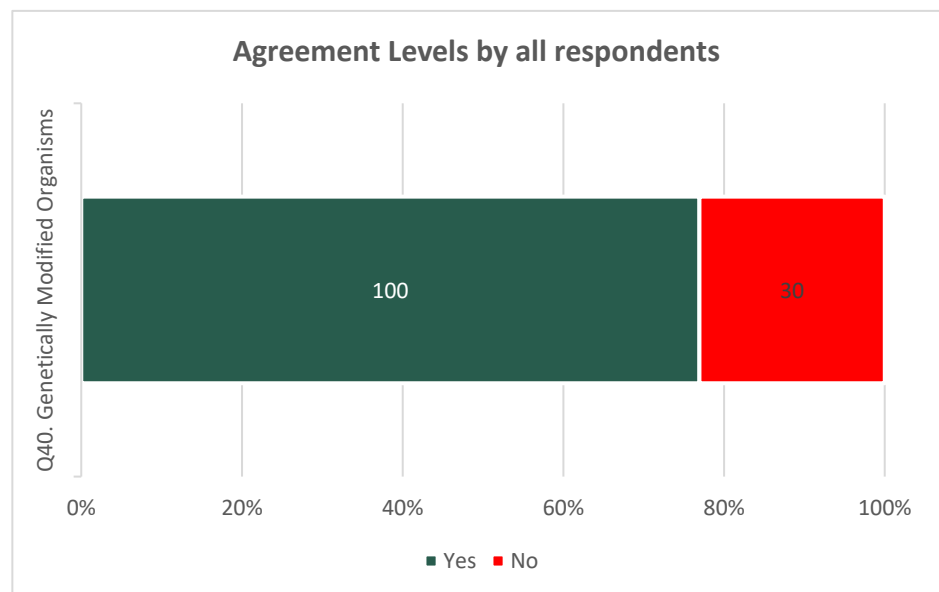


Figure 72. Agreement levels for Question 40 across all respondents

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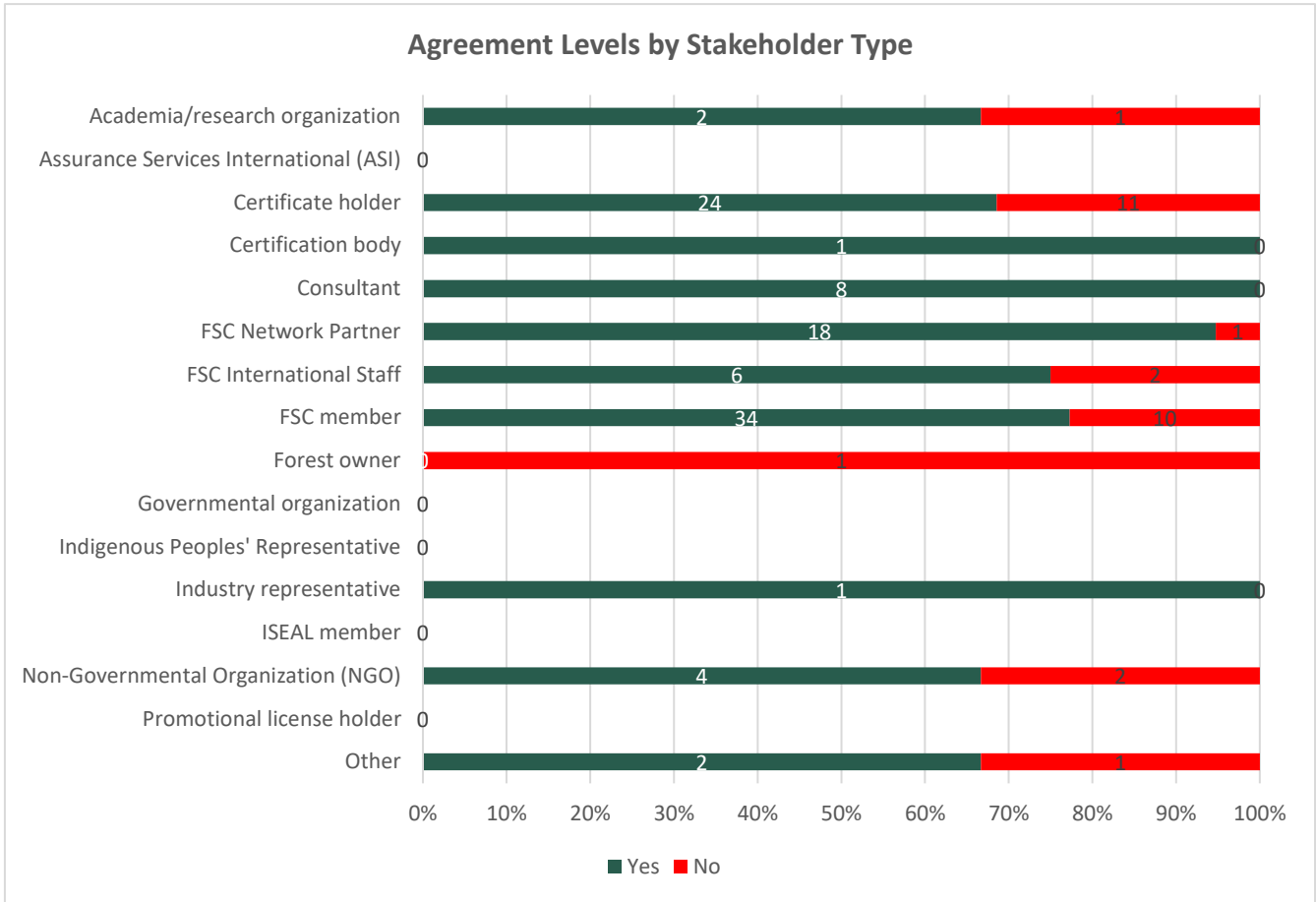


Figure 73. Agreement levels for Question 40 by stakeholder type

The question was answered by 130 respondents. The majority supports updating the definition of GMOs in the PCI revision. Of the 130 responses, 77% said 'Yes' to the proposal, while 23% disagreed.

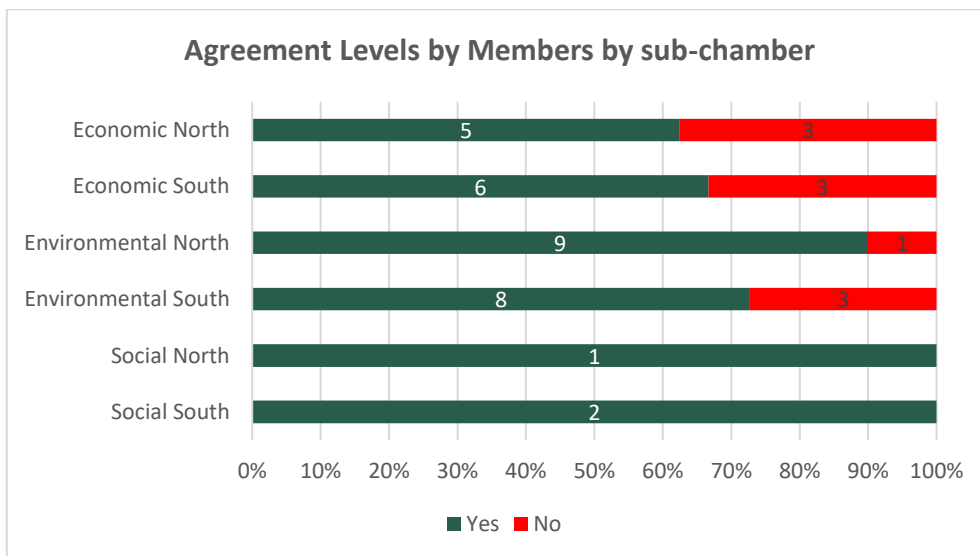


Figure 74. Agreement levels for Question 40 by sub-chamber

The question was answered by 41 FSC members across all six sub-chambers. Overall support is evident across sub-chambers, although some opposition is expressed within the Economic and Environmental sub-chambers.

## 9.2 Open feedback on Genetically Modified Organisms

### Q41. Do you have any additional comments, suggestions or feedback regarding the section on revising the GMO definition?

The analysis of 67 responses to Question 41 regarding the revision of the definition of ‘GMO’ shows that stakeholders largely support updating the definition of ‘GMO’ to cover modern techniques (e.g., Clustered Regularly Interspaced Short Palindromic Repeats-CRISPR) while keeping the prohibition intact. Conditional support calls for a strong precautionary approach, expert input, clear labelling/verification, tight research boundaries, and no back-door for GMO/Genetically Engineered (GE) trees. Neutral views reflect uncertainty about the scope and why the topic is revisited. Opposition favours product-based criteria (e.g., exogenous DNA), limited derogations for clear environmental benefits, or a separate dialogue – while a small minority rejects any revision on reputational grounds and prefers the status quo or external definitions.

Below is a summary of key feedback from participants, grouped into five categories according to the degree of their support or opposition to the proposal.

Categories of Comments	Summary of Comments
<b>Strong support</b>	A few respondents clearly support updating the definition to ensure modern techniques (including CRISPR) are covered, primarily to maintain consistency and avoid loopholes while continuing FSC’s prohibition. This includes views that the definition must be ‘future-proofed’ and kept aligned across FSC’s normative framework.
<b>Support, but with conditions / improvements requested</b>	Many support a revision if strong safeguards are in place: (1) clear precautionary approach and cautious wording (e.g., explicit calls to prioritize precaution globally); (2) expert engagement and transparency during drafting (e.g., requests to involve leaders/experts); (3) labelling and verification questions: some want GMO/GE products to be clearly labelled and verification methods to be clarified; (4) no ‘back door’, ensuring the update does not enable the certification of GMO/GE trees.
<b>Neutral / abstain / unclear</b>	Some respondents indicate no opinion, lack of expertise, or confusion about why the topic is consulted again and/or how the question is framed. Some provide no substantive comment beyond “no comments/not sure”.
<b>Opposition with alternative proposal / approach</b>	Many respondents opposed the current approach. Themes include: (1) prefer outcome- or product-based criteria (e.g., stable exogenous DNA present) instead of method-based classification (multiple comments argue CRISPR without foreign DNA can be indistinguishable from natural or mutagenesis outcomes; propose using ‘exogenous DNA present’ as an objective criterion); (2) call for limited allowances/derogations in very specific cases that deliver clear environmental benefits (e.g., sterile stock to prevent wilding conifers; species rescue against pests/pathogens); (3) ask for an open dialogue rather than a general approach; some question whether the PCI is the right forum and prefer a separate, thorough process.
<b>Strong opposition or rejection</b>	A few respondents reject revising the definition and/or reject any renewed engagement on GMOs, often mentioning reputational risk, corporate pressure, greenwashing concerns, or a call to stop re-opening the matter (including some

Categories of Comments	Summary of Comments
	<p>requesting to adopt an external definition like the Cartagena Protocol). Some stress that GMOs compromise natural processes and should remain strictly banned, while others say the definition is already clear and should not be changed.</p>

*Table 9. Summary of qualitative feedback on Genetically Modified Organisms*

## 10. Additional Comments

This synthesis reviews the written ‘additional comments’ from 41 participants submitted to the Conceptual Phase Public Consultation.

Below are the grouped topics and a summary of the feedback from participants.

Topics	Summary of Comments
<b>Engagement and inclusivity</b>	Stakeholders emphasize the need for stronger engagement measures, including face-to-face national workshops to foster broader dialogue, capturing member exchanges, and improving language accessibility. One comment expresses dissatisfaction with language support, arguing that offering Spanish and French – but no other member languages – creates a perception of preferential treatment. Stakeholders also call for comprehensive transition support, including training, guidance, and crosswalk tools to help long-standing certificate holders adapt to the revised PCI.
<b>Governance and representation</b>	Comments highlight a need for further expert representation in the revision, noting that economic and landowner perspectives are underrepresented compared to biodiversity and Indigenous expertise.
<b>Process design and timing</b>	One stakeholder suggested sharing an early, simplified draft of the revised P&C before detailed drafting, to make it easier for stakeholders to comment on the overall direction and structure in the next phase. More broadly, several stakeholders emphasized the need for multiple rounds of consultation, where possible, and more time to reflect on and understand the changes, noting that overlapping processes (GA, EUDR, and other revision processes, etc.) made participation difficult. Some express concern that specific controversial topics may influence the joint GA vote and suggest identifying the most sensitive topics in advance.
<b>Purpose and scope of PCI</b>	Some stakeholders ask for a clear statement of the PCI’s purpose and the revision’s objectives beyond the periodic review, to avoid changes that lack clear justification. Others propose extending the scope to include the responsible use of forest products in the global economy, not just forest management. There is also a request to clarify the definition of ‘Organization’ to allow structural units (e.g., branches, districts) to hold certificates.
<b>Outcome orientation and modular approach</b>	Stakeholders generally support modularity and outcome orientation but request concrete examples, workshops, and input from external experts to ensure practical implementation. They stress that these changes should not increase audit complexity or costs. Comments also mention that the adopt/adapt/drop/add (AADA) principle must be genuinely respected during national standard development.
<b>Streamlining and viability</b>	Many comments call for significant simplification of the standard, reducing the number of principles and criteria and avoiding excessive standardization. Stakeholders argue that complexity and high certification costs limit FSC’s global reach and credibility, given that less than 5% of the global forest area is certified. They also note that economic viability is underemphasized in the current proposals.

Topics	Summary of Comments
<b>Climate, biodiversity, and resilience</b>	Stakeholders support explicit requirements for climate adaptation and mitigation, standardized biodiversity indicators, and climate-smart practices such as post-fire regeneration. They also request that the theory of change address weeds and pests and that language be updated to refer to 'natural ecosystem vegetation cover' rather than only forests.

*Table 10. Summary of qualitative feedback on Additional comments*

## ANNEXES

The following annexes 1 and 2 provide supplementary contextual information and non-exhaustive summaries of discussions, questions, and feedback raised during relevant FSC General Assembly 2025 sessions. These inputs have been presented in this report by topic, along with additional consolidated summaries of discussion points raised during the sessions. They were not analysed as a separate quantitative dataset and were not treated as equivalent to individual responses submitted through the FSC Consultation Platform. In addition, inputs received through emails before, during, and after the launch of the online consultation are presented in annex 3 and will be considered into the development of key proposals presented to the PCI working group for decision-making.

### Annex 1: The future of FSC’s Forest Management Certification: Scope & Applicability in the Principles, Criteria & Indicators Revision

Session Details	
<b>Side meeting name</b>	The future of FSC’s Forest Management Certification: Scope & Applicability in the Principles, Criteria & Indicators Revision
<b>Date &amp; time</b>	28 October 2025
<b>Location (room name)</b>	Seascape Ballroom
<b>Organizer/host (name of person and/or organization)</b>	Sandra Fahd, FM programme (P&P)
<b>Names of all speakers</b>	Sandra Fahd
<b>Number of attendees</b>	125

Session Overview	
<b>Purpose/theme of the session in 2-3 sentences.</b>	<p>The session aimed to empower FSC Members to engage deeply with the key topics under consultation within the revision of FSC’s Principles and Criteria (P&amp;C) and International Generic Indicators (IGI), referred to as PCI.</p> <p>It also sought to collect member feedback on three guiding questions concerning the scope and applicability of the PCI, to support the ongoing consultation process.</p>

## Summary of discussion points

### What about the current PCI matters the most, and why?

- The PCI emphasizes continuous improvement and promotes transparency through the publication and dissemination of information.
- The P&C are globally applicable, providing consistency and credibility across diverse contexts.
- The framework supports the maintenance of viable forests and biodiversity while upholding engagement and stakeholder dialogue throughout the Forest Management cycle.
- The P&C are effort-oriented and play a key role in protecting workers' rights, Indigenous Peoples, and smallholders.
- Principle 2 is particularly significant in regions facing challenges with compliance under Principle 1 (Legal Compliance).
- Principle 10 is central; what truly matters is what happens on the ground.
- A participant used a metaphor: "A person has a path and a dream to come back to life; along the way, there are challenges. To reach the dream, we need a common language to move forward together as one family. The P&C is that common language; they help us achieve conditions that sustain life."

### What would a modular version of the PCI (V6) look like? What are the different contexts to be considered?

- The modular approach should balance risk and adaptability, ensuring flexibility without losing the essence of Small and Low-Intensity Managed Forests (SLIMF) differentiation.
- It should allow for contextual adjustments across forest types, regions, and products (timber and non-timber forest products).
- A risk-based, outcome-oriented model was favored, emphasizing flexibility, simplification, and effectiveness.
- The new PCI could adopt a layered structure, a core module with additional modules (A, B, C...) added based on context (e.g., country, forest type, risk level).
- The standard should remain user-friendly and accessible, enabling responsible choices and ease of use.
- Participants stressed the need for local language accessibility, especially in countries like India, where millions of women work in Non-Timber Forest Products (NTFP) sectors.
- The PCI should go beyond legal compliance, applying a risk-based and adaptive approach.
- Participants noted challenges around rigid requirements that don't account for regional variation (e.g., differences between the U.S., Canada, and Ghana).
- While flexibility is needed, it also complicates evaluation—participants called for balance and expertise-driven modular design.
- Excessive control by FSC International was cited as a source of frustration, lengthening processes.

**Main points, announcements, or key debates — use bullet points.**

### Summary of discussion points

- Participants emphasized that every change affects local implementation differently, underscoring the need for flexibility and contextual adaptation

#### How could a new PCI structure facilitate the implementation of requirements by key users?

- The new structure should be simple, easy to understand, and free from redundancy.
- It should be applicable across different contexts and maintain coherence across principles.
- Participants agreed that the Principles and Criteria should remain interconnected and not treated as standalone elements.

*Note:* Due to time constraints, this question was not discussed in depth.

### Memorable Quotes

#### Direct quotes with attribution.

“We love the PCI because they are a global foundation that provides integrity, differentiation, and consistency. They are a comprehensive guide to translating the meaning of responsible forest stewardship”.

### Outcomes and Next Steps

- Participants are encouraged to participate in the public consultation until 30 November 2025.
- Participants are also invited to join consultative forums and provide ongoing feedback.
- Participants were reminded to stay engaged over the next two years as the PCI revision process continues.

### Atmosphere and Participation

#### Energy in the room, notable attendees, reactions, engagement.

- Participants were divided into groups based on their experience with PCI and preferred language of discussion.
- Discussions were dynamic and inclusive, supported by staff from the Policy and Performance Unit and with the support of facilitators Anna Jenkins and Maria Inesi.
- Online participation included four members.

## Annex 2: The future of FSC’s Forest Management Certification: Social aspects, climate change & biodiversity aspects in the Principles, Criteria & Indicators Revision

Session Details	
Side meeting name	The future of FSC’s Forest Management Certification: Social aspects, climate change & biodiversity aspects in the Principles, Criteria & Indicators Revision
Date & time	29 October 2025
Location (room name)	Seascape Ballroom
Organizer/host (name of person and/or organization)	Diana Franco / FM programme (P&P)
Names of all speakers	Diana Franco
Number of attendees	155

Session Overview	
Purpose/theme of the session in 2-3 sentences	<p>The session aimed to empower FSC members to engage deeply with the key topics under consultation within the revision of FSC’s Principles and Criteria (P&amp;C) and International Generic Indicators (IGI), referred to as PCI.</p> <p>It also aimed to collect feedback from members on two guiding questions concerning social and environmental aspects of the PCI to support the ongoing consultation process.</p>

Summary of discussion points	
Main points, announcements, or key debates — use bullet points.	<p><b>How can the next version of the PCI better reflect our shared commitment to respecting Indigenous Peoples’ rights and integrating gender equality?</b></p> <ul style="list-style-type: none"> <li>• Enhanced support for Indigenous Peoples (IP): FSC and network partners (NPs) should increase tools, engagement, and direct communication with IP.</li> <li>• FPIC improvements: strengthen Free, Prior, and Informed Consent processes, especially to amplify the voices of women and youth.</li> <li>• Gender and cultural sensitivity: avoid generalizations; recognize cultural norms and promote intercultural dialogue and gender-balanced representation.</li> </ul>

## Summary of discussion points

- FSC expertise and collaboration: FSC IC brings Indigenous Peoples' rights expertise to decision-making; NPs are building capacity and should act as counterparts to auditors.
- Recognition of existing efforts: FSC is already doing good work (e.g., FM, HCVs 5 & 6), but these efforts need better communication and storytelling.
- Certification beyond harvesting: FSC should facilitate certification in areas not solely focused on resource extraction.
- Respect for Indigenous women's life plans: promote inclusion, career opportunities, and respect for Indigenous women's aspirations.
- Regional diversity matters: cultural differences across Latin America affect representation and inclusion strategies.
- Pragmatic implementation: balance complexity and cost with integrity; provide clearer guidance on handling specific issues.
- Beyond legal compliance: FSC should aim to exceed legal requirements, respecting local knowledge and cultural values, especially in places like Congo.

### **How can the next PCI bring our shared commitment to climate and biodiversity to life?**

- Adaptation and resilience: forests must adapt to changing conditions while maintaining biodiversity and ecosystem services.
- Carbon strategies: emphasize carbon sequestration (above/below ground and in products) and accounting; carbon credits should reduce harvest pressure.
- Business models: develop investment-driven models that benefit forest owners and incentivize conservation.
- Climate risk management: companies need strategies for wildfire preparedness and broader climate-related risks.
- Standards credibility: overloading adaptation into FSC standards risks diluting their clarity and credibility.
- Outcome-focused certification: shift from process-heavy standards to impact-driven approaches; explore alternative certification systems.
- Carbon credit relevance: consider the end-product's carbon impact, not just forest-level metrics.
- Chain of Custody (CoC) awareness: FM certificate holders must understand product lifecycle impacts, even if products are burned.
- Knowledge sharing: learn from regions like Australia; expand practices to other ecosystems and share biodiversity monitoring methods.
- FSC strengths: FSC is strong in biodiversity and conservation; these should remain central, alongside traditional knowledge.
- Climate adaptability mapping: identify where climate adaptation is addressed, including risks like landslides in Canada.
- Carbon footprint tracking: measure operational emissions and integrate local/traditional knowledge.
- HCVs and biodiversity: use High Conservation Values (HCVs) as a lens for biodiversity and extreme event planning.
- Communication strategy: improve both quantity and quality of climate-related communications, even beyond the PCI.

### Summary of discussion points

- Deforestation emissions: most emissions stem from deforestation outside FSC-certified forests.
- Biomass utilization: promote biomass use to mitigate fire risks.
- Call for clarity: revisit the fundamental principle of climate within FSC's framework.

### Memorable Quotes

#### Direct quotes with attribution

“FSC is currently very strong. Put in the centre the biodiversity, conservation, resilience, and traditional knowledge – on the FM.” (fishbowl activity – no direct attribution)

“Non-Indigenous Peoples tend to think they are right, and do not really listen to the views and needs of Indigenous Peoples. Just thinking that our society's rules are the norm. How can FSC ensure to value those distinctive ways of thinking, living, among others?” (online quote – no direct attribution)

### Outcomes and Next Steps

- Participants are encouraged to participate in public consultation until 30 November 2025.
- Participants are also invited to join consultative forums and provide ongoing feedback.
- Participants were reminded to stay engaged over the next two years as the PCI revision process continues.

### Atmosphere and Participation

#### Energy in the room, notable attendees, reactions, engagement.

- Participants were divided into groups based on their experience with the PCI and preferred language of discussion.
- Discussions were dynamic and inclusive, supported by staff from the Policy and Performance Unit and facilitators Maria Ines Miranda and Anna Jenkins.
- Online participation included 11 members.

### Annex 3: Stakeholder Feedback received via email

Emails details	
Period	29.09.2025- 18.01.2026
Emails received	19
Stakeholders involved	19

Summary of Comment	
<b>FSC Consultation platform and digital tools</b>	<ul style="list-style-type: none"> <li>• Repeated problems with the consultation platform (submission errors, visibility of comments, technical instability).</li> <li>• Survey tools (e.g. SurveyMonkey) are insufficient for nuanced, complex commenting on policy development. In particular:               <ul style="list-style-type: none"> <li>• Open comments not reflected in summaries.</li> <li>• Yes/no or scale questions oversimplify issues.</li> <li>• Technical reliability issues (answers not saved properly).</li> <li>• FSC teams should fully test digital tools internally before launch.</li> </ul> </li> </ul>
Action point for Secretariat	
<ul style="list-style-type: none"> <li>• As part of the engagement, dialogues and Consultative forums will be added for more opportunities for conversation around complex policy development and then say that the technical comments will be included for the upcoming revision of the consultation platform.</li> <li>• The consultation platform is planned to be enhanced in the coming years.</li> </ul>	

Summary of Comment	
<b>Engagement, communication and transparency</b>	<ul style="list-style-type: none"> <li>• Strong call for improved engagement by FSC Secretariat teams (Bonn and internationally):</li> <li>• Better listening to members, stakeholders, and constituencies. Clearer feedback loops and communication.</li> <li>• Members express willingness to stay engaged and continue dialogue, if structures support it.</li> <li>• Lack of visibility and information at General Assembly 2025 (GA) and side events (e.g. PCI revision side event had little substance or advance information).</li> <li>• Request for a clear “who is who / who does what” directory on the FSC website with names and contact details.</li> </ul>
Action points for Secretariat	
<ul style="list-style-type: none"> <li>• Information was added to the GA portal to increase the visibility of speakers during the side events</li> <li>• The PCI Engagement Plan to be published.</li> <li>• The PCI documents will include author, data and basic metadata.</li> </ul>	

### Summary of Comment

#### PCI revision: Purpose and Scope

FSC systems have expanded far beyond their original intent; the PCI underpins nearly everything.

- Revision should include:
  1. Deeper reflection on FSC’s purpose and future relevance.
  2. Recognition of changing global context (climate, biodiversity, social crises).
  3. Redesign of the overall architecture of FSC systems, not just indicators.

Calls for agreement on: purpose, objectives, and success criteria before drafting solutions or timelines.

Streamline structure:

1. Integrate HCVs appropriately
2. Reassess or remove Principle 10

#### Action points for Secretariat

- The feedback was consolidated and reflected in the conceptual phase results.
- The Secretariat will ensure that upcoming discussion papers and consultation documents explicitly address purpose, scope of the PCI revision.
- Structural considerations (e.g. HCV integration, Principle 10) will be further analyzed within the relevant Working Group (WG).

### Summary of Comment

#### PCI revision: Modular approach and user-oriented

- User-oriented: PCI revision should address diverse user needs (members, Certificate holders (CH), Certification body (CB), auditors, partners).
- Calls to move away from “one-size-fits-all” approaches toward differentiated, risk-responsive systems
- Structural questions identified as top priority discussion topics: Modular vs. One-size-fits-all
- What belongs in a “core” vs non-core requirement
- Unresolved issues: Implications for credibility and labelling (single vs multiple labels).
- Risks of applying one label to very different standards.
- Interest in lessons from past work in Continued Improvement Procedure WG, Controlled Forest Management WG and models such as: Separation of Quality Management Systems (QMS) and Potential alignment with external frameworks (e.g. Taskforce on Nature-related Financial Disclosures) could influence structure.
- Concern that streamlining through restructuring (e.g. merging P9 into P6) may increase burden rather than reduce it.

#### Action points for Secretariat

- The feedback was consolidated and reflected in the results of the conceptual phase.
- The recommendations were incorporated into the feedback used to develop the Modular Approach proposal for PCI WG.

### Summary of Comment

#### Risk-based and outcome orientation

- Strong emphasis on risk-based approaches:
  1. Prioritisation of high-risk issues.
  2. “Muting” low risk requirements (known but not routinely audited).
- Outcome orientation is necessary but must be conceptually clean:
  1. Criteria define desired outcomes.
  2. Indicators show progress toward outcomes.
- Recognition of trade offs:
  1. Quantified indicators increase rigor but also cost.
  2. Certification is an assurance system based on sampling, not a research guarantee.
- Requests for clearer, simpler, and legally robust wording of standards.

#### Action points for Secretariat

- Recognize and address different user needs within the framework.
- The feedback on separating outcomes from procedures (keep P&C focused on outcomes) was reflected in the conceptual phase results.

### Summary of Comment

#### Audit integrity and conflict of interest

- Persistent concern over structural conflicts of interest in auditing: comparisons to carbon credit schemes (e.g. Verra).
- Suggestions include:
  1. FSC Secretariat commissioning/supervising audits for high risk cases.
  2. Risk based CB–CH arrangements (CB rotation and FSC appointed CBs for large, high risk CHs).
- Concerns about feasibility for small/low risk CHs.
- Call to bring Assurance Services International (ASI) formally into discussions.
- Reinforcement of FSC’s strength in independent, outcome based verification.

#### Action points for Secretariat

- Considerations on risk-based approaches and oversight mechanisms will be further explored in relevant workstreams.
- The Secretariat will engage with Assurance Services International (ASI) to ensure alignment.

### Summary of Comment

**Specific Content Areas for PCI Revision**

- Topics explicitly referenced in comments include:
  1. Climate change, forest resilience, biodiversity conservation.
  2. Intact Forest Landscapes (IFLs).
  3. Indigenous Peoples in Voluntary Isolation.
  4. Vegetation types.
  5. Tropical Forest Management as a conservation option.
  6. Losses due to wildfires (new requirement).
  7. Policy on excision, advice notes, interpretations, glossary, GMOs.
- Recognition of FSC’s market leadership on HCVs, which should not be weakened.
- Maintaining FSC value beyond the first cutting cycle and preventing degradation over time.

**Action points for Secretariat**

Comments were incorporated into the Excel matrix under the relevant sections of the consultation results.

**Summary of Comment**

**Process Design, Governance, and Learning from the Past**

- Critique of past revisions:
  1. Over-detailed standards (V4–V5).
  2. Mixing objectives and procedures.
  3. Limited success of field testing.
- Preference for early-stage, exploratory methods: symposium-style or Delphi approaches.
- Emphasis on consensus-building across Board, members, auditors, and CHs.
- Warning against designing solutions before agreeing on the “why”.
- Strong warning not to rush the conceptual phase.
- PCI revision should connect to:
  1. Global Strategy 2027–2032.
  2. FSC’s long term credibility and market value.

**Action points for Secretariat**

- The Secretariat acknowledges the importance of learning from past revision processes and has incorporated this feedback into the development of the Terms of Reference.
- The need for stronger consensus-building and stakeholder alignment will be reflected in the PCI Engagement Plan.
- The timeline will aim to balance efficiency with the need for sufficient reflection, avoiding premature progression to solution development.
- A joint session between the Global Strategy and PCI teams was planned during the GA to ensure alignment and discussion of future directions.



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