Report

IFL ADVICE NOTE: ADV-STD-60-004_02

Consultation Report: Development of Requirements for enhanced HCV 2 management and monitoring in IFL

FSC FORESTS FOR ALL FOREVER™

Title:	IFL Advice Note: ADV-STD-60-004_02
Dates:	**Publication date:** 1 July 2026
Contact for comments:	**Email:** policyinnovation@fsc.org
Objective of document:	This report provides an overview of stakeholder feedback on the consultation regarding the new IFL Clauses set out in Advice Note ADV-STD-60-004_02 V1-0. These Clauses are derived from Motion 45/2025 and will apply in the Motion 23 pilot countries.
Confidential?	☐ Yes ☒ No
Intended audience	☐ Internal (FSC) ☒ External
Personal data included?	☐ Yes ☒ No

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INTRODUCTION

Forest Stewardship Council (FSC) is developing interim normative measures as part of the implementation of Motion 45/2025, specifically:

Code	Title
ADV-STD-60-004_02	Advice Note on the development of Clauses for enhanced HCV 2 management and monitoring in IFL
ADV-STD-60-004_03	Advice Note on IFL Clauses for tropical natural forests. Except: Brazil, Peru, and the Republic of Congo.

The Forest Stewardship Council (FSC) is implementing Motion 45/2025 “Moving beyond fixed thresholds to outcome-based conservation for Intact Forest Landscapes (IFLs)”, adopted at the 2025 FSC General Assembly. The motion marked an important milestone in the evolution of FSC’s normative approach to Intact Forest Landscapes by promoting a transition from fixed threshold-based approaches towards strengthened outcome-based conservation and monitoring of forest integrity.

As part of the implementation of Motion 45/2025, FSC initiated the development of interim normative measures to support enhanced management and monitoring of Intact Forest Landscapes through the High Conservation Value (HCV 2) framework. These interim measures are being introduced through a set of Advice Notes intended to support a phased implementation approach while longer-term Clauses are integrated into the ongoing revision of the FSC Principles and Criteria and International Generic Indicators (PCI revision, FSC-STD-60-004 V3).

At its 104th meeting in December 2025, the FSC Board of Directors (BoD) approved interim measures to begin implementing Motion 45/2025, including interim Clauses and eligibility criteria for countries outside the Motion 23/2020 pilot landscapes. Following this mandate, FSC established a Technical Working Group (TWG) to develop a first set of enhanced generic Clauses for HCV 2 management and monitoring in IFLs. In parallel, an internal Working Group was established to support the development of Advice Notes for eligible opt-in countries. For this Advice Note, the Policy and Standards Committee (PSC) acts as the decision-making body.

This consultation report relates specifically to Advice Note ADV-STD-60-004_02 V1-0 “Enhanced HCV 2 management and monitoring of Intact Forest Landscapes (IFLs)”, hereafter referred to as “ADV1”. ADV1 aims to strengthen the management and monitoring of Intact Forest Landscapes through enhanced Clauses related to:

1. Identification and planning measures for HCV 2 and IFL management;
2. Management measures to maintain and/or enhance the integrity and protection of IFLs;
3. Monitoring approaches to assess the effectiveness of management measures and changes in forest integrity over time; and
4. Strengthened engagement and coordination with affected rights holders, affected and interested stakeholders, and experts, including Indigenous Peoples, Traditional Peoples, and local communities.

As part of the drafting phase of ADV1, FSC conducted a public consultation open to all interested stakeholders. The consultation aimed to present the proposed interim and supporting Clauses for enhanced HCV 2 management and monitoring in IFLs and gather stakeholder feedback on their clarity, feasibility, auditability, and overall suitability for implementation.

The consultation was opened on the FSC Consultation Platform from 02 April until 01 May 2026. Stakeholders were invited to provide feedback through a structured questionnaire comprising 92 questions, including both quantitative rating questions and qualitative comment fields. Supporting

materials, including the draft ADV1, explanatory background information, and consultation guidance documents, were made available to facilitate informed participation.

This report presents an analysis of the stakeholder responses received during the consultation period, including both quantitative results and qualitative feedback. A summary is provided per section to allow for quick reference, while detailed analysis is presented in the respective sections that follow.

The FSC team would like to thank all participants for their engagement and valuable contributions to this important process. The feedback received through this consultation will support the further refinement of ADV1 and contribute to FSC's ongoing work to strengthen outcome-based conservation approaches for Intact Forest Landscapes within the FSC system.

For further information related to the process, please visit the dedicated process page or contact policyinnovation@fsc.org.

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ABBREVIATIONS

ASI	Assurance Services International
BoD	Board of Directors
CB	Certification Body
CH	Certificate Holder
FSC	Forest Stewardship Council
FSS	Forest Stewardship Standard
HCV	High Conservation Value
IFL	Intact Forest Landscape
IGI	International Generic Indicators
PCI	Principles, Criteria and International Generic Indicators
P&C	Principles and Criteria
PSG	Policy Steering Group
PSC	Policy and Standards Committee
TWG	Technical Working Group

METHODOLOGY

The consultation on ADV-STD-60-004_02 V1-0 “Enhanced HCV 2 management and monitoring of Intact Forest Landscapes (IFLs)” (ADV1) was conducted digitally through the FSC Consultation Platform. The consultation was open from 02 April to 01 May 2026. Stakeholders were invited to submit their feedback through a structured online questionnaire. This report presents the quantitative and qualitative analysis of the responses received during this period.

Consultation materials

Participants were provided with a consultation package to support informed participation. The materials made available included:

- Draft ADV-STD-60-004_02 V1-0 in English, Spanish and French (PDF)
- Consultation guidance materials in English, Spanish and French (PDF)
- Canadian crosswalk document to support Canadian stakeholders (provided throughout the process page) (PDF)
- The structured consultation questions hosted on the FSC Consultation Platform

The consultation materials explained the background and objectives of the ADV1, including the transition towards outcome-based conservation approaches for Intact Forest Landscapes (IFLs), the development of enhanced HCV 2 management and monitoring Clauses, and the proposed interim implementation approach pending integration into the ongoing revision of the Principles, Criteria and International Generic Indicators (PCI revision, FSC-STD-60-004 V3).

Stakeholder engagement

Stakeholder engagement was conducted primarily through the public online consultation hosted on the FSC Consultation Platform. In addition, FSC organized two webinars during the consultation period to support understanding of the proposed Clauses and facilitate participation.

A public webinar was held on 28 April 2026 with simultaneous English, Spanish, and French interpretation. In addition, a focused webinar for stakeholders from tropical countries was held on 30 April 2026 with simultaneous English and Portuguese interpretation. The webinars presented the background and objectives of Motion 45/2025, the key elements of the draft Advice Notes, the structure of the consultation, and provided participants with the opportunity to ask clarification questions.

Participation in these webinars did not constitute formal consultation input. Only feedback submitted through the FSC Consultation Platform during the official consultation period was included in the analysis.

Consultation structure and questions

The consultation consisted of 92 structured questions organized according to the thematic sections of the draft ADV1. The consultation included general questions and Clause-specific questions related to the proposed Clauses for identification and planning, management, monitoring, and stakeholder engagement in relation to HCV 2 and Intact Forest Landscapes.

Most questions used a Likert-scale format (closed-ended questions), ranging from 5 (fully agree or very clear) to 1 (fully disagree or very unclear). Each rating question was followed by open-text fields allowing respondents to provide justification, clarification, or additional suggestions regarding the clarity, feasibility, auditability, and overall suitability for implementation of the proposed Clauses (open-ended questions). General questions were mandatory, while Clause-specific questions were optional. Respondents were therefore not required to answer every Clause-related question in order to submit their responses.

Data analysis and Interpretation of results

The results were analysed by FSC International. All responses submitted through the FSC Consultation Platform within the consultation period, as well as additional feedback received via email in document format, were included in the analysis. Responses submitted in languages other than English were translated into English for analysis purposes.

Quantitative analysis was applied to closed-ended questions. Percentages and absolute numbers presented in this report are based on the total number of responses received for each individual question, as participation varied by question. The results were interpreted based on the distribution of responses across agreement levels. A higher proportion of “agree” and “fully agree” responses was considered indicative of support, while higher levels of “disagree” and “fully disagree” indicated opposition. Where a large proportion of respondents selected the neutral option, this was interpreted as either uncertainty or the absence of a clear position among stakeholders.

Qualitative responses were reviewed and analysed to identify recurring themes, areas of convergence or divergence, and specific concerns related to the clarity, feasibility, auditability, and overall suitability for implementation of the proposed Clauses. Comments were grouped by topic and synthesized in the relevant sections of this report to reflect the range of views expressed by stakeholders. Themes mentioned by multiple respondents or across stakeholder groups were considered indicative of broader concerns, while less frequent comments were included where they provided relevant or substantive insights.

Due to the optional nature of Clause-specific questions, participation levels varied across sections and individual questions. As a result, findings should be interpreted in the context of the number and diversity of responses received for each question.

Stakeholder types

The stakeholder types reflected in the consultation results correspond to the options available on the FSC Consultation Platform. These included: Certificate Holder; Environmental NGO; Social NGO; Certification Body; Competent Authority; Industry Representative; Government; Consultant; Promotional License Holder; Assurance Services International (ASI); FSC Network; FSC International Staff Member; and Other.

In addition, respondents were asked whether they are FSC members and, if applicable, to indicate their membership chamber and sub-chamber (Social North, Social South, Environmental North, Environmental South, Economic North, Economic South).

Stakeholder type and FSC membership information are based on self-identification by respondents. Results presented in this report rely on self-declared stakeholder categories, and analysis by stakeholder group reflects this self-identification.

OVERALL PARTICIPATION

This section provides an overview of participation in the consultation on ADV1. Detailed results per question are presented in the respective sections of this report. A total of 41 participants took part in the consultation. This figure includes respondents who answered at least one consultation question during the consultation period, as well as additional written submissions received by email.

Regional Representation

The consultation attracted participation from stakeholders across all FSC regions, ensuring geographically diverse representation. Responses were received from 21 countries.

Europe accounted for the largest share of responses, representing 44% of total participants (18 respondents). North America contributed 29% (12 respondents), followed by Latin America with 17% (7 respondents), Asia Pacific with 5% (2 respondents), and Africa with 2% (1 respondent). One additional response (2%) was received from the United Kingdom, which was analysed separately from the European regional grouping (Figure 1).

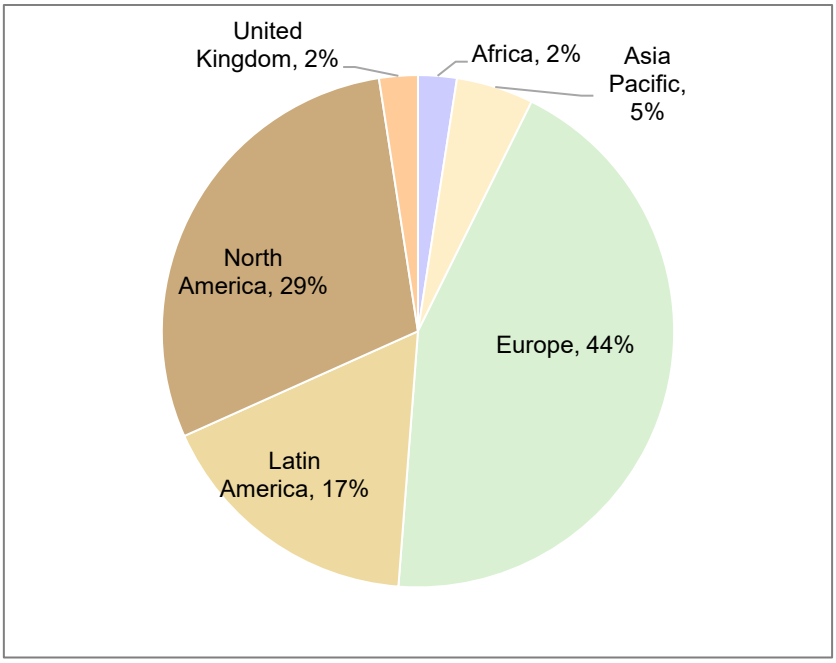

Figure 1 Breakdown of participants per region.

At the country level (Figure 2), the United States recorded the highest number of respondents (7), followed by Canada (5), and Brazil and the Netherlands (4 each). Other countries with notable participation included Belgium, France, Sweden, and Switzerland (2 respondents each). The remaining responses were distributed across 13 additional countries, reflecting a geographically diverse range of perspectives.

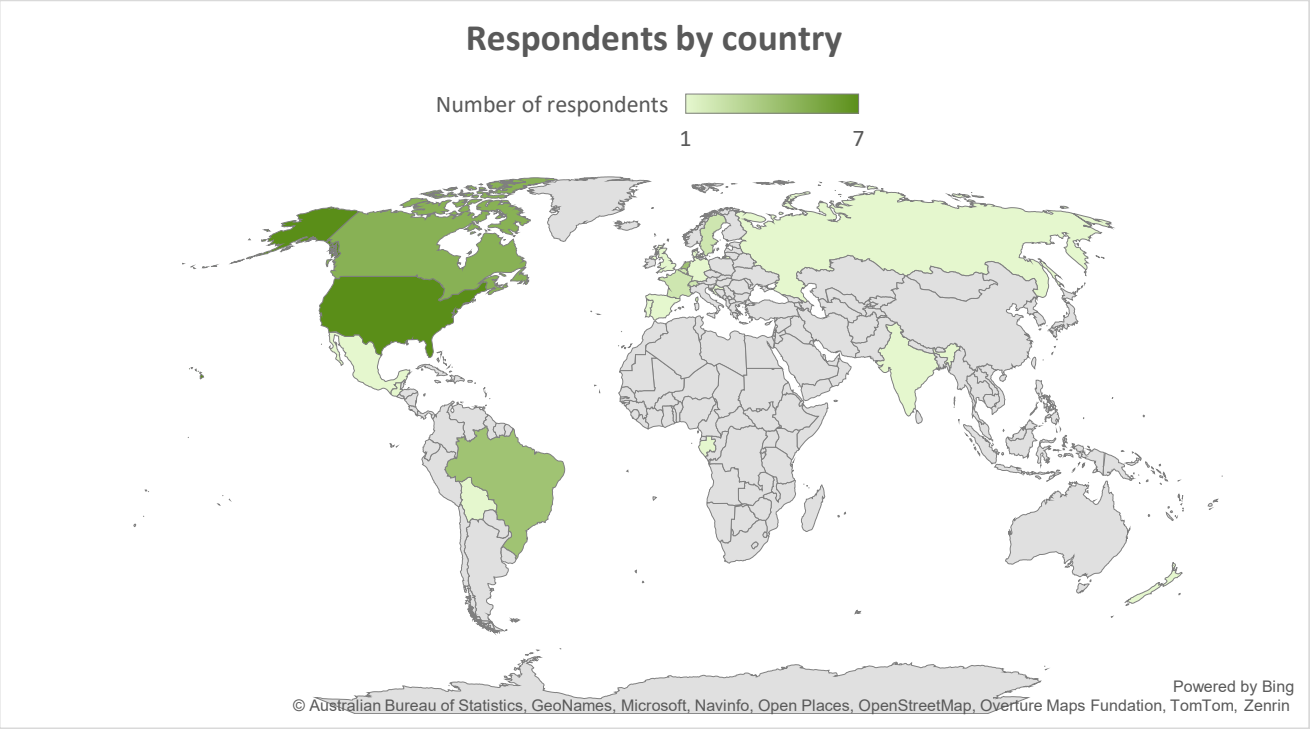

Figure 2 Number of respondents per country

Stakeholder Type

Respondents were asked to identify themselves according to their stakeholder background. Certificate holders represented the largest stakeholder group, accounting for 27% of respondents (11 respondents). Environmental NGOs represented 22% (9 respondents), followed by "Other" at 12% (5 respondents), and Consultants at 10% (4 respondents). FSC International staff members, FSC Network representatives, and Industry representatives each accounted for 5% (2 respondents each). Assurance Services International (ASI), Certification Bodies, Competent Authorities, FSC Members, and Social NGOs each represented 2% (1 respondent each).

The distribution reflects relatively strong participation from implementation-focused stakeholders, particularly certificate holders, as well as environmental organizations and technical experts (Figure 3).

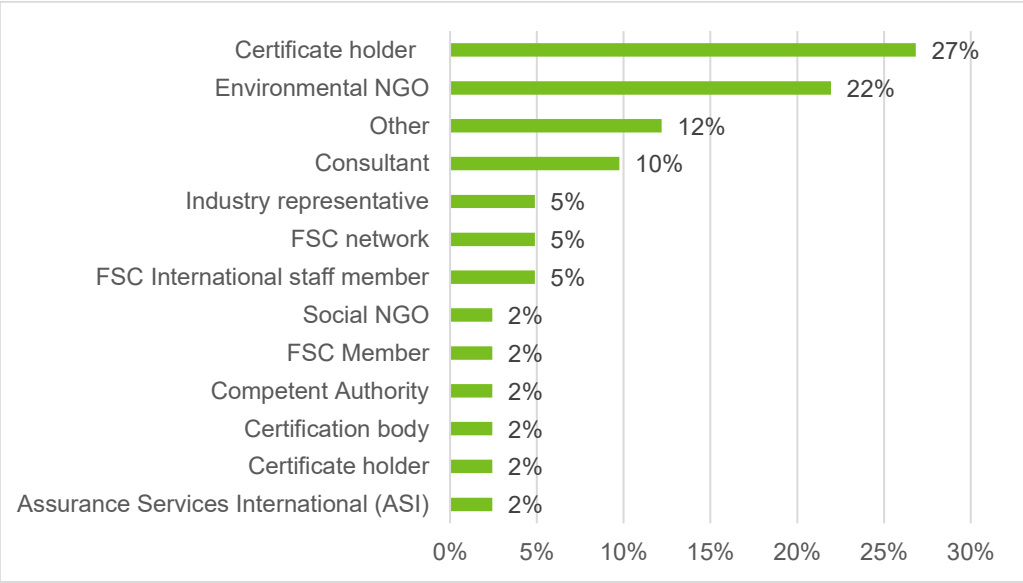

Figure 3 Participation levels by stakeholder types: percentage of respondents by stakeholder type

FSC Membership Representation

A total of 28 respondents identified themselves as FSC members and indicated their chamber affiliation. The Environmental North chamber represented the largest share of participating FSC members, accounting for 36% (10 respondents), followed by the Economic North chamber at 29% (8 respondents). Environmental South represented 14% (4 respondents), while Economic South and Social South each represented 11% (3 respondents each). No respondents identified themselves as members of the Social North chamber (Figure 4).

As stakeholder type and membership information are based on self-identification, the chamber distribution reflects the categories selected by respondents. Individuals identifying under other stakeholder categories (e.g. Certificate Holder, FSC Network, or Consultant) may also be FSC members but may not have selected a membership category in this section.

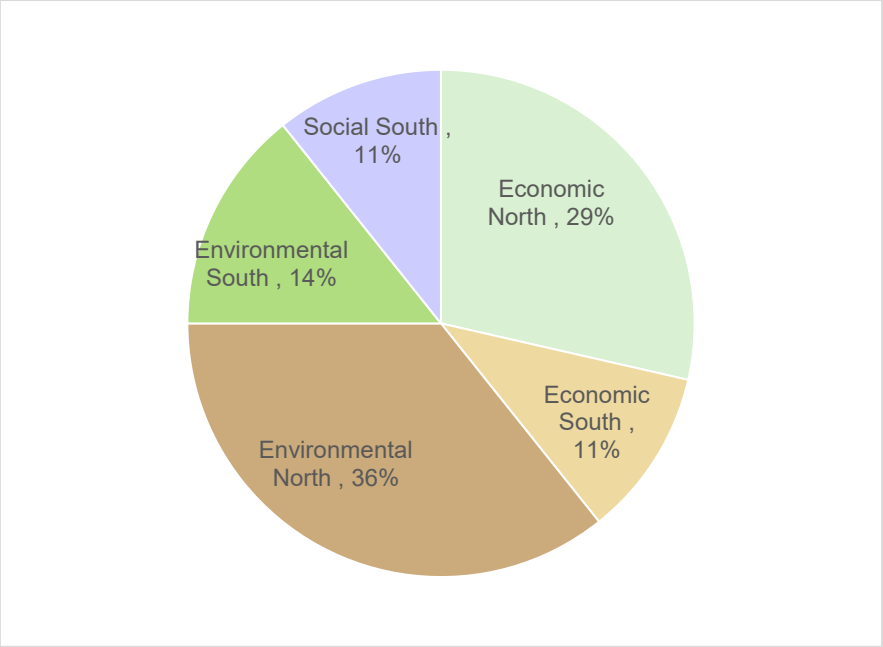

Figure 4 Breakdown of participation by FSC Membership Chambers.

Respondents involved in the development and revision of FSC Forest Stewardship Standards

Respondents were asked whether they had previous experience participating in the development or revision of FSC Forest Stewardship Standards (FSS). Of the 38 respondents who answered this question, 23 respondents indicated prior involvement, while 15 respondents indicated no previous involvement.

Among respondents with previous experience in FSC normative processes, FSC Members represented the largest group (13 respondents), followed by Certificate Holders (3 respondents) and FSC Network Partner staff (3 respondents). Participation was also reported among FSC International staff members, Consultants, Certification Bodies/auditors, and “Other” stakeholder groups (Figure 5).

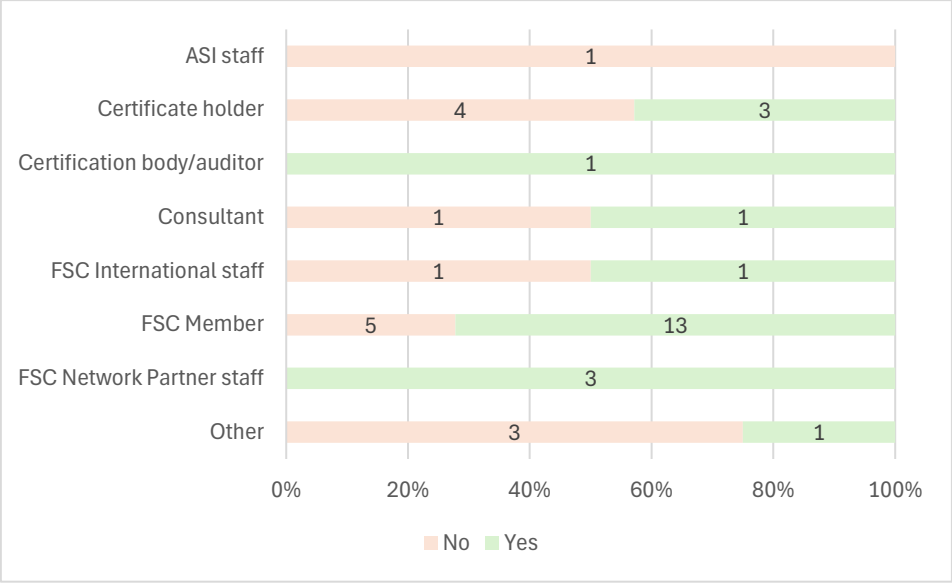

Figure 5 Breakdown of participants by stakeholder level who were involved in the development and revision of FSS

Respondents involved in the implementation of Motion 23/2020 pilot activities

Respondents were also asked whether they had previously participated in the implementation of Motion 23/2020 pilot activities. Of the 39 respondents who answered this question, 13 respondents indicated prior involvement, while 26 respondents indicated no involvement.

Certificate Holders represented the stakeholder group with the highest level of participation in Motion 23/2020 pilot activities (6 respondents), followed by FSC Members (3 respondents). Participation was also reported among FSC Network Partner staff, FSC International staff members, Consultants, and Other stakeholder groups (Figure 6).

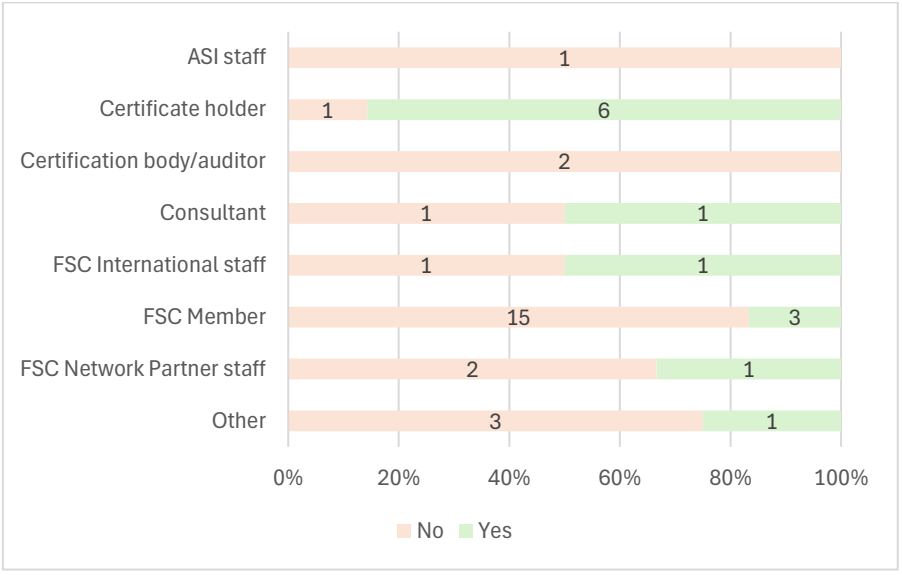

Figure 6 Breakdown of participants by stakeholder level who were involved in the implementation of Motion23/2020 pilots

Respondents directly affected by the Advice Note (ADV1)

Respondents were asked whether the proposed ADV1 would directly affect their work or activities. Of the 38 respondents who answered this question, 18 respondents indicated that they would be directly affected, while 20 respondents indicated that they would not.

Certificate Holders represented the largest group of respondents, indicating direct impact from the Advice Note (5 respondents), followed by FSC Members (6 respondents). FSC Network Partner staff, Certification Bodies/auditors, FSC International staff members, Consultants, and ASI staff also reported potential direct impacts related to the implementation of the proposed Clauses (Figure 7).

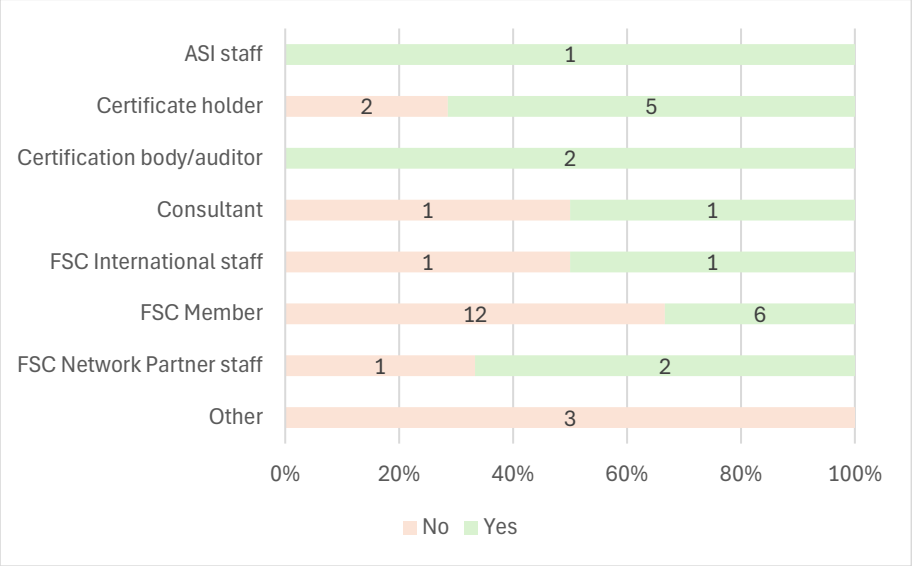

Figure 7 Breakdown of participants by stakeholder level who will be directly affected by this ADV1

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RESPONSES

Figure 8 presents the overall levels of agreement, neutrality, and disagreement for the consultation questions that used a Likert-scale response format. The figure provides an overview of stakeholder responses regarding the overall content and scope of ADV1, as well as the proposed Clauses included in the draft Advice Note. Percentages of responses are displayed in the chart, while the total number of respondents per question and response category is indicated within the corresponding bars.

Overall, the consultation results indicate moderate to high levels of agreement across most proposed Clauses. However, responses also reveal areas where stakeholders expressed concerns related to the scope, feasibility, clarity, auditability, or implementation implications of specific Clauses. Participation levels varied across questions due to the optional nature of the Clause-specific sections.

The overall content and scope of ADV1 generated relatively divided opinions among respondents. While 41% of respondents expressed agreement with the overall content and scope of the Advice Note, 44% expressed disagreement, representing the only consultation question where disagreement exceeded agreement. This result suggests differing stakeholder perspectives regarding the overall approach, scope, or direction of the proposed interim measures.

Higher levels of agreement were observed for several individual Clauses, particularly those related to management and monitoring approaches for HCV 2 and Intact Forest Landscapes. The highest level of agreement was recorded for Clause 17, which received 81% agreement and only 8% disagreement. Clause 8 also showed strong support, with 75% agreement and comparatively low disagreement levels (16%). Similarly, Clause 3 received 71% agreement, while Clause 18 received 68% agreement.

Additional Clauses demonstrating relatively strong levels of support included Clauses 12, 15, 16, and 10, all of which received agreement levels above 60% and comparatively low levels of disagreement. These results suggest that stakeholders generally supported several of the proposed operational and monitoring-related Clauses included in ADV1.

In contrast, more divided responses were observed for several Clauses where agreement and disagreement levels were comparatively closer. Clause 5 showed the highest level of disagreement among the individual Clauses, with 36% disagreement and 48% agreement. Clauses 1 and 4 each received 32% disagreement, while Clause 2 received 30% disagreement. Clause 13 also showed relatively divided views, recording 45% agreement, 26% neutral responses, and 29% disagreement.

Several Clauses also generated comparatively high levels of neutral responses, particularly Clauses 11, 12, 13, and 15, where neutral responses ranged from 23% to 26%. This may indicate areas where stakeholders considered that additional clarification, guidance, or refinement of the proposed Clauses may be necessary.

Overall, the results suggest that stakeholders generally supported many of the proposed Clauses contained in ADV1, particularly those related to monitoring and operational implementation. At the same time, the consultation identified several areas where stakeholders expressed concerns or requested further clarification regarding feasibility, implementation implications, and the overall scope and framing of the Advice Note. Detailed analysis of responses and qualitative feedback for each Clause is presented in the following sections of this report

Figure 8 Overall agreement/disagreement with the scope of ADV1 and its Clauses, as measured by a Likert scale.

1. Agreement with the content and scope of ADV-STD-60-004_02

Q.1 Do you agree with the overall content and scope of this advice note? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 41 participants and generated relatively divided responses. Overall, 41% of respondents expressed agreement (agree and fully agree combined), while 44% expressed disagreement (disagree and fully disagree combined). An additional 15% of respondents selected the neutral option (Figure 9).

The results indicate differing stakeholder perspectives regarding the overall content, structure, and scope of ADV1. While a substantial proportion of respondents supported the general direction and objectives of the Advice Note, a slightly larger proportion expressed concerns regarding its current design, implementation implications, or alignment with existing FSC processes and Clauses.

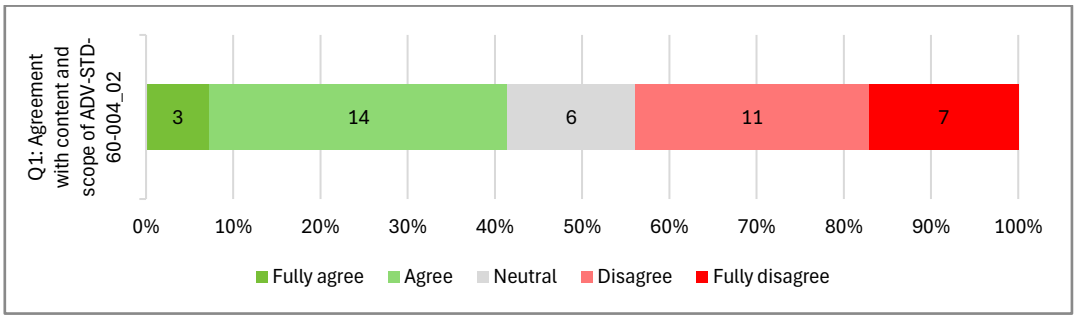

Figure 9 Agreement levels by all respondents for Q1

Across stakeholder types, responses varied considerably. FSC Members showed comparatively higher levels of disagreement, particularly within the “disagree” category. FSC Network Partner staff responses also leaned predominantly toward disagreement. In contrast, Certificate Holders showed more mixed responses distributed across all agreement levels, while Certification Bodies/auditors expressed comparatively higher levels of agreement. Responses from Environmental NGOs and Consultants were more balanced between agreement, disagreement, and neutral positions. The distribution of responses by stakeholder type is presented in Figure 10.

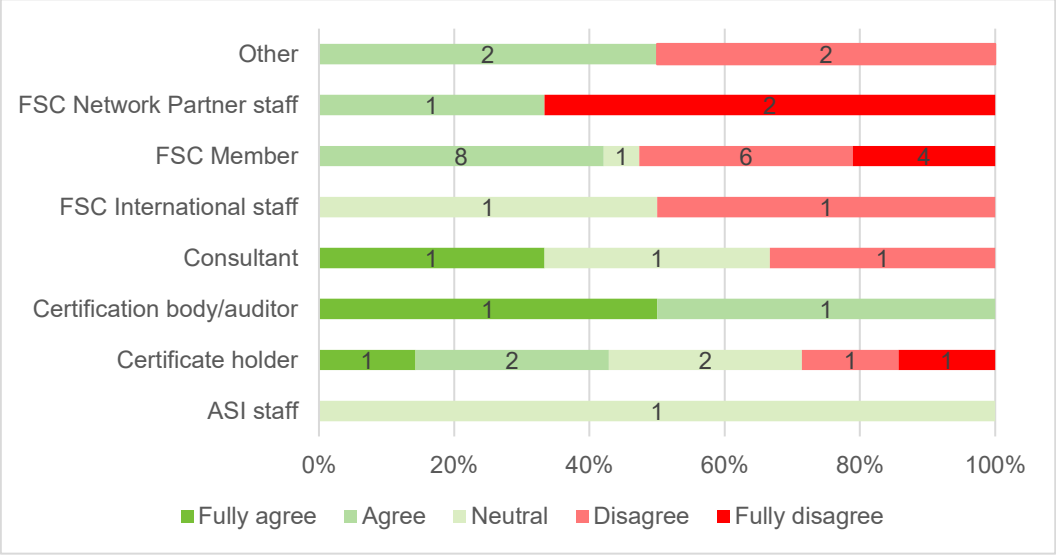

Figure 10 Agreement levels by stakeholder type for Q1: number of respondents

Differences across FSC membership chambers were also observed. Economic South and Social South respondents showed comparatively higher levels of agreement, while Environmental North respondents showed higher levels of disagreement. Economic North respondents presented more mixed views distributed across all response categories. Respondents who identified as non-members also showed relatively divided opinions, with responses spread across disagreement, neutrality, and agreement categories. The distribution of responses by chamber is presented in Figure 11.

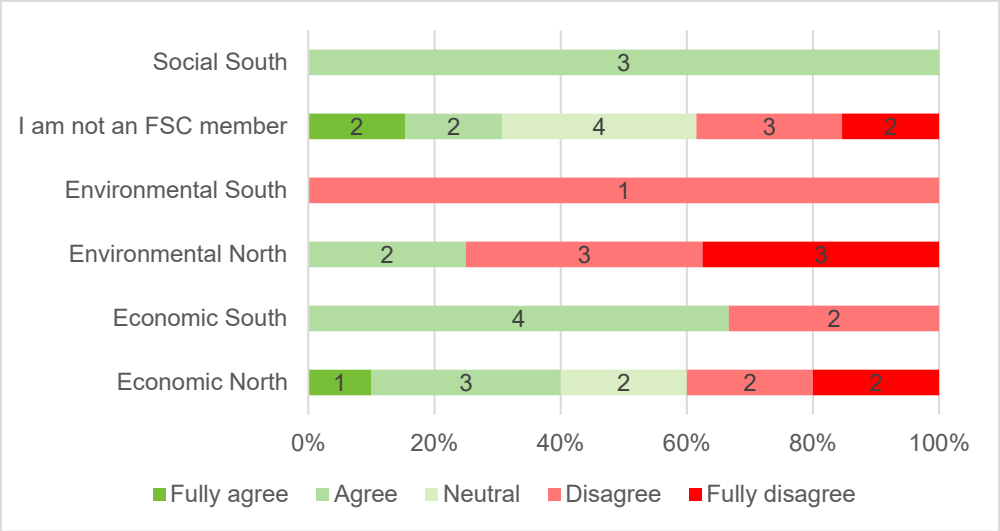

Figure 11 Agreement levels by FSC Membership Chambers for Q1: number of respondents

Open feedback overall agreement with ADV1

Q.2 Please briefly explain why you agree or do not agree with the overall content and scope of this advice note.

A total of 33 open feedback comments were received for this question. Overall, the comments reflect broad recognition of the importance of strengthening FSC's approach to Intact Forest Landscapes and general support for the transition toward outcome-based conservation and enhanced HCV 2 management.

At the same time, respondents raised substantial concerns regarding the current drafting of the Advice Note, particularly in relation to its overall complexity, the number of proposed Clauses, clarity of terminology, auditability, implementation feasibility, and alignment with Motion 45/2025 and Motion 23/2020 pilot processes. Several comments also highlighted concerns related to implementation timelines, transition arrangements, ecological assumptions, proportionality, and the potential overlap with existing FSC Clauses and national processes. Table 1 below summarizes the main themes identified in stakeholder feedback.

Table 1 Summary of key feedback from participants for Q1: Overall agreement with content and scope of ADV-STD-60-004_02

No.	Categories of Comments	Summary of Comments	FSC Clarification
1	General support for the direction and outcome-based approach	Several respondents support the overall intent of the Advice Note, especially the move from fixed thresholds toward outcome-based IFL conservation, enhanced HCV 2 management, and stronger monitoring. Some see the Advice Note as a useful interim step and a way to better align FSC certification with the IFL concept.	FSC appreciates the positive feedback on the overall intent of the Advice Note and its objective of strengthening the management and monitoring of ecological integrity features and socio-cultural values within Intact Forest Landscapes (IFLs).
2	Support in principle, but concerns with current drafting	A recurring position is: “we agree with the intention, but not yet with the content.” Respondents consider the direction valid, but argue that the current draft is too complex, too broad, insufficiently structured, or not yet ready for implementation	The revised Advice Note has been substantially simplified to improve clarity and facilitate implementation. The implementation approach has also been revised so that only the first four Clauses became effective on 1 July 2026, while the remaining Clauses will be further refined during Phase 2 (V2-0) before becoming effective.
3	Excessive number of Clauses and overall complexity	Several respondents consider the package too large and complex, especially with 18 new Clauses. Concerns focus on burden for certificate holders, duplication with existing FSS or Motion 23 Clauses, and the risk that IFL Clauses become disproportionately large within the standard.	The revised Advice Note has been substantially simplified. The consultation draft contained 18 Clauses, whereas the revised Advice Note contains 12 Clauses. In addition, only the first four Clauses became effective on 1 July 2026, while the remaining Clauses will be further refined during Phase 2 (V2-0) prior to implementation.
4	Misalignment with Motion 45 and Motion 23 pilot processes	A significant cluster of comments argues that the Advice Note does not sufficiently reflect the formal text, rationale, and implementation pathway of Motion 45. Particular concern is raised about how Phase 1 and Phase 2 relate to each other, and how the generic Clauses interact with Motion 23 pilot outcomes, especially in Canada.	The revised Advice Note provides greater clarity regarding the phased implementation approach and the relationship between the initial implementation phase and the further development of region-specific requirements during Phase 2 (V2-0). It also clarifies the interaction between the Advice Note and the revised Forest Stewardship Standards developed through the Motion 23 pilot processes. FSC will continue to work with Network Partners to facilitate implementation, including through supporting materials where appropriate.
5	Need for clearer implementation pathway, transition period and national integration	Respondents ask for more time, clearer transition arrangements, and stronger integration through SDGs or national processes. This is especially relevant for Motion 23 pilot countries, where respondents argue that immediate application of generic Clauses may create duplication, uncertainty, and implementation fatigue.	The revised Advice Note introduces a phased implementation approach, providing a clearer transition pathway and additional time for Organizations to prepare for the implementation of the remaining Clauses during Phase 2 (V2-0).

No.	Categories of Comments	Summary of Comments	FSC Clarification
6	Concern that the Advice Note may weaken intactness or the HCV approach	Some respondents raise strong concerns that the draft may shift from maintaining IFL intactness to allowing degradation followed by uncertain recovery. These comments question whether the Advice Note adequately maintains IFLs as HCV 2 and whether recovery provisions are sufficiently bounded by clear limits and timeframes.	The revised Advice Note has been amended to strengthen the protection of ecological integrity features and socio-cultural values. It clarifies that forest operations shall not be conducted where these values cannot withstand disturbance, providing an additional safeguard for Intact Forest Landscapes and addressing concerns that the approach could permit degradation followed by uncertain recovery.
7	Feasibility, cost and proportionality concerns	Respondents highlight that monitoring, data collection, recovery assessment, and implementation may be costly and time-consuming. This is particularly relevant for tropical contexts, SLIMFs, and organizations with fewer resources.	FSC recognizes these concerns. The revised Advice Note has been streamlined and introduces a phased implementation approach to provide Organizations with additional time to prepare for implementation. The monitoring framework has also been simplified, while measures within the Sphere of Influence are stipulated to remain proportionate to the Organization's scale and capacity to influence.
8	Ecological and scientific concerns	Some comments question the ecological assumptions behind the Advice Note, including the scientific basis of IFLs, the use of satellite-based integrity assessments, the suitability of reference states, and the applicability of certain ecological features across biomes such as boreal and tropical forests.	The revised Advice Note has been simplified to provide a generic framework applicable across different contexts. More context-specific approaches, including regionally adapted provisions where appropriate, will be developed during Phase 2 (V2-0).
9	Concerns about overlap with public policy or existing FSC Clauses	Some respondents consider that parts of the Advice Note may duplicate existing public policy frameworks, existing NFSS Clauses, Motion 23 Clauses, or current HCV Clauses.	The revised Advice Note has been further aligned with the existing FSC normative framework through clearer references to the applicable Principles, Criteria and International Generic Indicators (IGIs). Additional implementation support will also be developed to facilitate alignment with national Forest Stewardship Standards where appropriate.
10	Consultation process concerns	A smaller but important set of comments refers to the short review period, late timing of the webinar, and limited opportunity to absorb changes before consultation.	FSC appreciates this feedback and has taken it into consideration for future consultation processes. The revised Advice Note also introduces a phased implementation approach, providing additional time for stakeholders to prepare for implementation.
11	Supply chain and indirect implications	Although the Advice Note focuses on FM, there may be indirect implications for Chain of Custody, particularly regarding sourcing, data availability, and due diligence expectations.	The Advice Note applies specifically to Organizations applying for or holding FSC FM certification under the Forest Stewardship Standards identified within its scope. It does not introduce new requirements for CoC certification, sourcing or due diligence. Any indirect implications resulting from changes in forest management practices would continue to be addressed through the existing FSC normative framework.

2. Clauses related to identifying and planning

Clause 1: Identification and delineation of IFL areas

Q.3 Agreement with Clause 1: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 38 participants. Overall, 50% of respondents expressed agreement with the content, clarity, and intent of Clause 1 (agree and fully agree combined), while 32% expressed disagreement (disagree and fully disagree combined). An additional 18% of respondents selected the neutral option. The results suggest moderate overall support for Clause 1, although responses also indicate the presence of important concerns among some stakeholder groups regarding the design, clarity, or implementation implications of the proposed Clause.

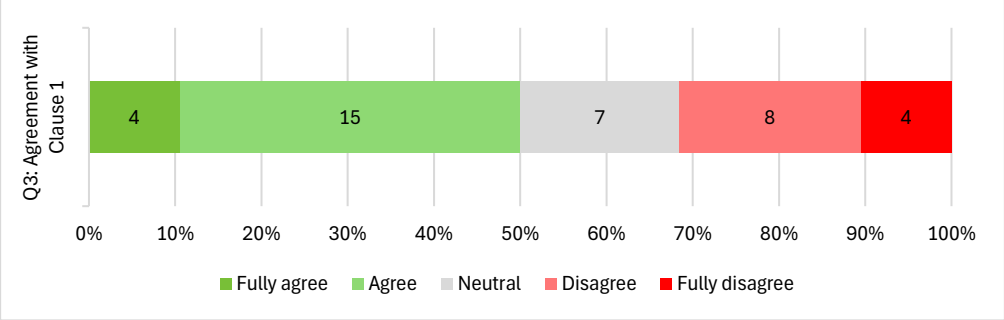

Figure 12 Agreement levels by all respondents for Clause 1.

Across stakeholder types, FSC Members showed comparatively higher levels of disagreement, particularly within the “disagree” category. FSC Network Partner staff responses also leaned toward disagreement. In contrast, Certificate Holders presented more balanced responses across agreement levels, while Certification Bodies/auditors showed comparatively stronger levels of agreement. Responses from Consultants, FSC International staff members, and Other stakeholder groups were more mixed between neutral, agreement, and disagreement categories. The distribution of responses by stakeholder type is presented in Figure 13.

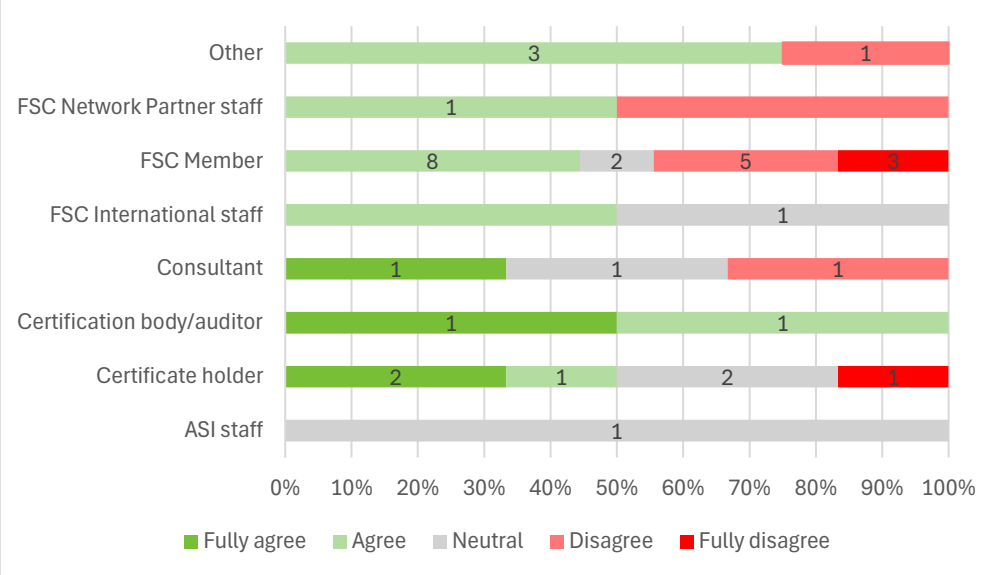

Figure 13 Agreement levels by stakeholder type for Clause 1: number of respondents

Differences across FSC membership chambers were also observed. Environmental North respondents showed comparatively higher levels of disagreement, while Economic South and Social South respondents showed stronger levels of agreement. Economic North respondents presented relatively mixed views distributed across all response categories. Respondents who identified as non-members also showed comparatively higher levels of agreement than disagreement. The distribution of responses by chamber is presented in Figure 14.

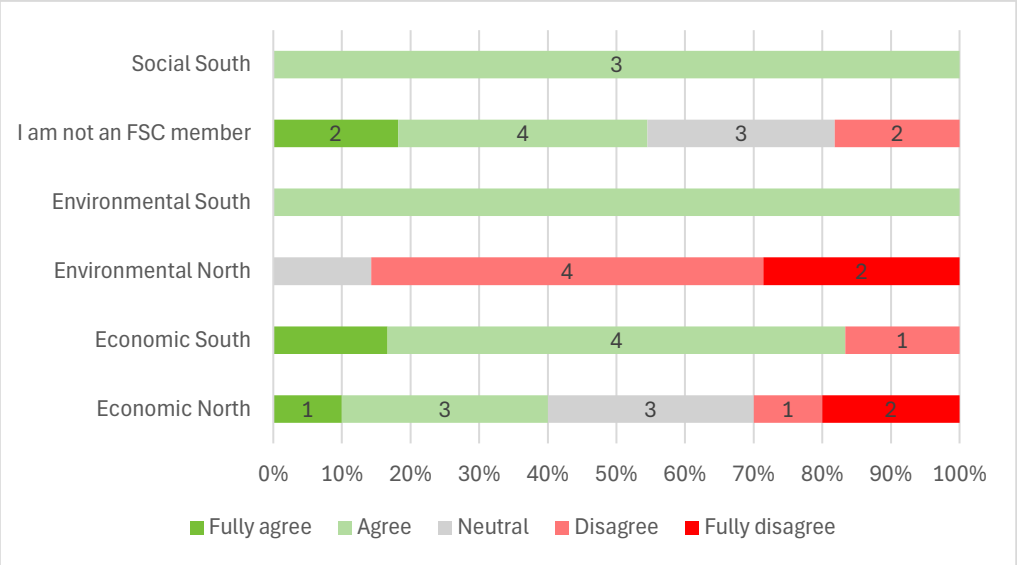

Figure 14 Agreement levels by FSC Membership Chambers for Clause 1: number of respondents

Q.4 Clarity and practical applicability: How clear and practically applicable are the Clauses for:
- identifying and delineating IFL areas overlapping with the Management Unit
- amending delineation using Best Available Information and other sources
- sharing maps and engaging with affected Indigenous Peoples and traditional peoples.

Please select on a scale of 1 to 5. (5 Very clear and applicable; 1 Very unclear or not applicable in practice)

A total of 34 participants responded to this question. Overall, 68% of respondents considered the Clauses to be at least moderately clear and applicable in practice (moderately clear/applicable, clear/mostly applicable, and very clear/applicable combined). In contrast, 32% of respondents considered the Clauses unclear, difficult to apply, or not applicable in practice (Figure 15).

These results suggest that while a majority of respondents considered the proposed Clauses to be generally understandable and implementable, a substantial proportion of stakeholders identified potential challenges related to practical application, interpretation, or operationalization.

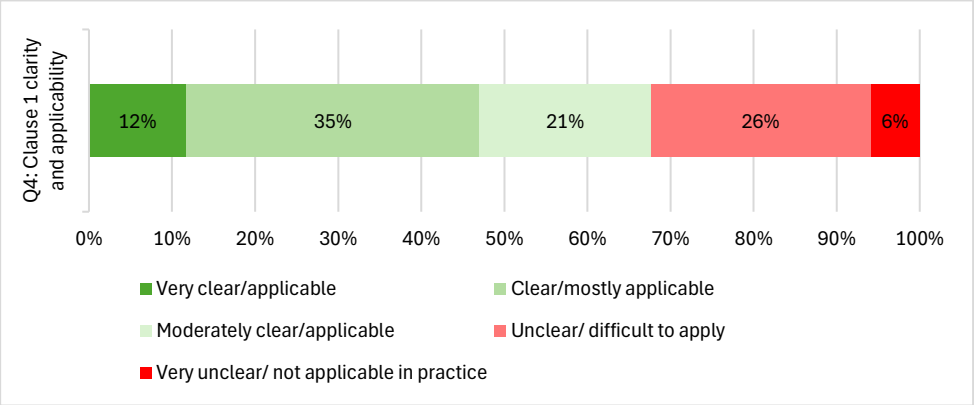

Figure 15 Clarity levels by all respondents for Clause 1.

Across stakeholder groups, FSC Members and FSC Network Partner staff showed comparatively higher levels of uncertainty or concern regarding practical applicability, with responses concentrated in the "unclear/difficult to apply" categories. Certificate Holders presented more distributed responses across all categories, including both positive and critical assessments. Certification Bodies/auditors expressed comparatively strong support regarding clarity and applicability, with all responses concentrated in the highest agreement categories. Consultants and Other stakeholder groups also generally considered the Clauses to be applicable and understandable. The distribution of responses by stakeholder type is presented in Figure 16.

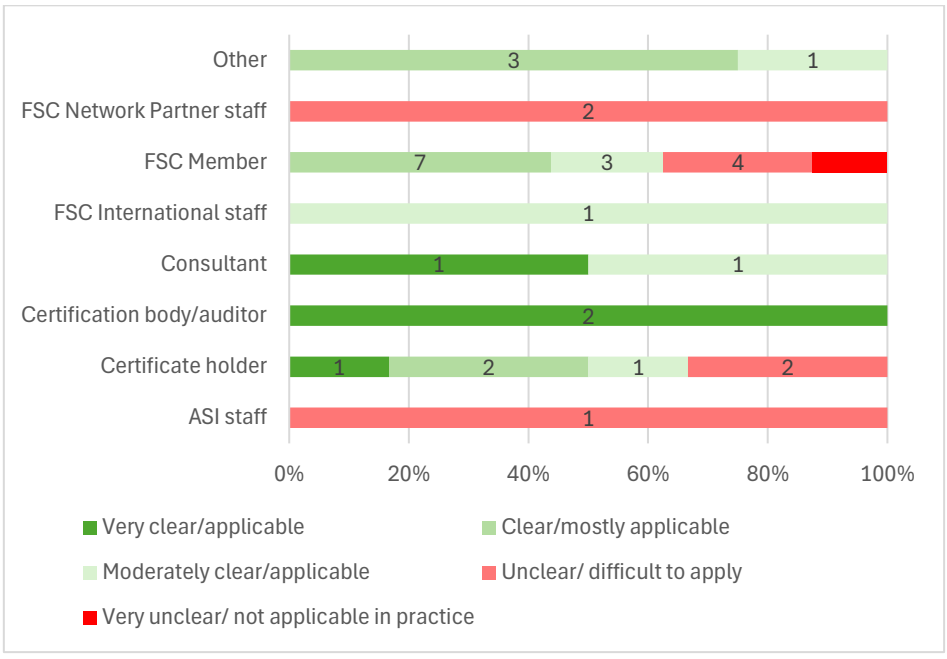

Figure 16 Clarity levels by stakeholder type for Clause 1: number of respondents

Differences among FSC membership chambers were also observed. Environmental North respondents showed comparatively higher levels of concern regarding clarity and applicability, while Economic South respondents expressed more positive assessments overall. Economic North respondents again showed relatively mixed views distributed across the different response categories. Respondents identifying as non-members also showed generally more positive assessments, with most responses concentrated in the moderately clear, clear, and very clear categories. The distribution of responses by chamber is presented in Figure 17.

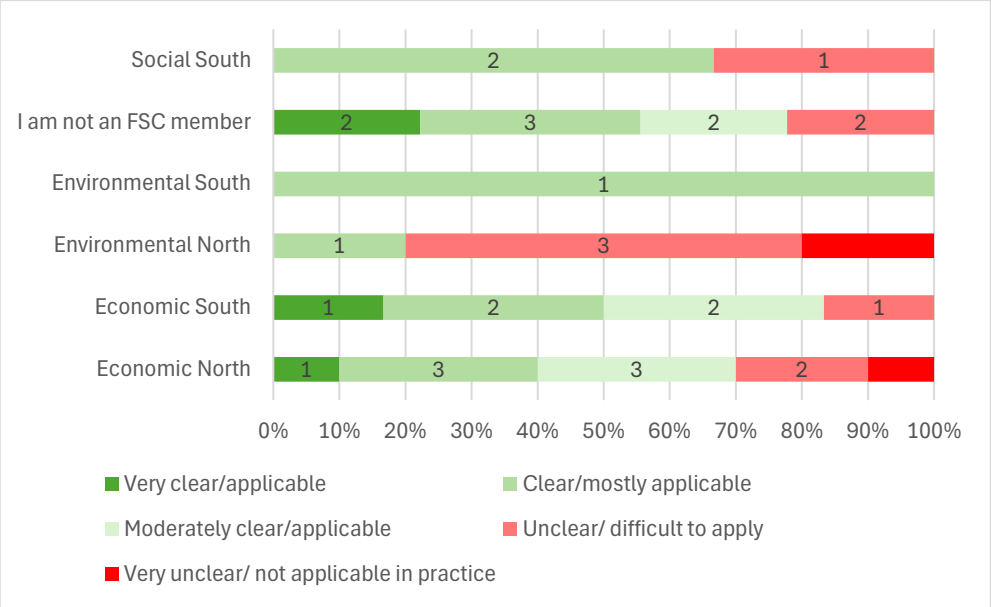

Figure 17 Clarity levels by FSC Membership Chambers for Clause 1: number of respondents

Open feedback for Clause 1

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 1:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause may weaken the concept of intactness by allowing excessive flexibility in redefining IFL boundaries and by insufficiently safeguarding the 2017 baseline referenced in Motion 45. Several comments also highlighted overlap with existing Motion 23 pilot work and existing NFSS Clauses, creating duplication and additional complexity.

b) Practical implementation constraints: stakeholders identified challenges related to data availability, dataset quality, technical complexity, and proportionality of implementation expectations, particularly regarding mapping obligations outside the Management Unit and participatory delineation processes.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently verify amended delineations, assess the validity of information sources, and distinguish justified adjustments from inappropriate weakening of IFL protections in the absence of clear normative thresholds and evidence expectations.

d) Further clarification or definitions required: multiple comments requested clearer definitions and operational guidance for concepts such as “Best Available Information,” “official datasets,” “background disturbance,” “reference state,” and delineation methodologies, as well as clearer rules regarding source hierarchy and acceptable evidence.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although several respondents raised concerns regarding alignment with national methodologies, SDG processes, and existing Motion 23 pilot outcomes, as well as expectations beyond organizations’ legal authority or operational control.

f) Elements to be revised or recommendations: key recommendations focused on maintaining the 2017 IFL baseline more explicitly, tightening conditions for modifying IFL delineations, simplifying the Clause, reducing redundancy with existing requirements and Motion 23 pilot work, clarifying the role of Indigenous Peoples in engagement processes, and strengthening proportionality and feasibility language.

Table 2 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 2 Summary of key feedback from participants for Clause 1: Identification and delineation of IFL areas

No	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for the objective and operational direction of the Clause	Respondents generally support strengthening IFL identification and delineation through Best Available Information and participatory approaches. Several comments recognize the Clause as coherent with FSC's HCV framework and existing IFL work. Positive feedback also highlights the inclusion of Indigenous knowledge and the flexibility to refine delineations beyond satellite imagery.	a, f	FSC appreciates the positive feedback on this Clause.
2	Need to maintain consistency with Motion 23 pilot work and existing national approaches	Several respondents, particularly from Canada, stress that IFLs have already been identified through existing processes and Motion 23 pilot work. Concerns are raised that Clause 1 may duplicate, replace, or conflict with already-developed national methodologies and Clauses. Respondents request alignment with SDG/NFSS processes and avoidance of parallel normative expectations.	a, d, f	The revised version of the Advice Note explains the interaction with M23 FSS. Other measures are planned to ease implementation, including collaborating with NPs and/or SDGs to develop crosswalk documents indicating which requirements overlap, are added or prevail in the event of an extraordinary discrepancy.
3	Clause perceived as too vague, subjective, or overly flexible	Several respondents consider the wording too loose and subjective, especially regarding the possibility to amend or reinterpret IFL boundaries. Concerns are raised that the current drafting could allow organizations to redefine or exclude IFLs too easily, weakening consistency and intactness protection.	a, c, d	Clause 1 has been revised and FSC is releasing a new interpretation to clarify its language and intent.
4	Need for stronger reference to intactness and fixed baseline expectations	A major recurring issue is the absence of sufficiently strong safeguards to maintain intactness as the defining characteristic of IFLs. Several respondents insist that the 2017 baseline delineation required under Motion 45 should be explicitly maintained and that amendments should only occur under strict and precautionary conditions.	a, d, f	The term 'intactness' is not explicitly used within Ecological Integrity Features. This reflects the view that maintaining ecological integrity is a clearer and more appropriate objective for organizations managing IFL areas than maintaining 'intactness'. It was considered that reintroducing intactness as a standalone term would create confusion regarding operational expectations for Intact Forest Landscapes (IFLs). Nevertheless, the concept of intactness remains implicitly embedded across the identified integrity features. By maintaining these features,

No	Categories of Comments	Summary of Comments	Related category	FSC Clarification
				intactness is effectively preserved through a continuum approach, rather than a binary intact/non-intact framing.
5	Need for clearer definitions and methodological guidance	Respondents repeatedly request clarification of key concepts and methodologies, including: “Best Available Information,” “reference state,” “official datasets,” “background disturbance,” delineation methodologies, and acceptable validation standards. Several comments also request clearer source hierarchy and evidence expectations.	d, f	Several key concepts have been further defined and clarified in the Advice Note, including “reference state” and other terms relevant to implementation. The Clause was also revised to clarify the conditions for correcting the 1 January 2017 IFL delineation based on Best Available Information.
6	Concerns regarding the use and quality of datasets	Multiple comments question the reliance on official government datasets alone and request inclusion of internationally recognized datasets, NGOs, researchers, and independent sources. Concerns are also raised about inconsistent, incomplete, or low-quality data in some regions.	b, c, d	Clause 1 specifies that correction to IFL delineation is based on Best Available Information, which covers concerns mentioned about lack of data or overreliance on government data alone.
7	Auditability and verification concerns	Respondents repeatedly highlight that the Clause remains difficult to audit consistently because it relies heavily on subjective interpretation and process-based Clauses rather than measurable normative expectations. Concerns relate to how auditors will verify amended delineations, quality of information sources, and whether organizations are redefining IFLs appropriately.	c, d	The correction of IFL delineation is already addressed within the FSC normative framework. Clause 1 has been revised to clarify the conditions under which the 1 January 2017 IFL delineation may be corrected, based on Best Available Information. A further interpretation INT-STD-60-004_05 providing additional clarification on IFL delineation is expected to be released soon.
8	Concerns regarding stakeholder engagement and Indigenous Peoples’ role	While engagement with Indigenous Peoples and traditional peoples is broadly supported, respondents question whether Indigenous Peoples should be expected to technically verify IFL delineations. Several comments stress that technical delineation requires specialized expertise and that engagement should instead focus on overlap with Indigenous territories, interests, and management impacts. Others highlight practical	b, c, d, f	Clause 1 has been revised, and the current wording cannot be interpreted as IP for the technical verification of IFL delineation.

No	Categories of Comments	Summary of Comments	Related category	FSC Clarification
		challenges related to maps, participation capacity, and culturally appropriate engagement.		
9	Need for proportionality and feasibility	Several respondents emphasize that implementation expectations should remain proportionate to organizational capacity, national context, data availability, and overlap between IFLs and Management Units. Concerns are raised regarding excessive mapping obligations, technical burdens, and implementation feasibility in tropical contexts or where only small overlaps exist.	b, f	IFL identification and delineation are already required under IGI V2-1 and should therefore not create a new mapping obligation for certificate holders. The final Clause also streamlined the requirements for correcting IFL delineations and removed some of the more prescriptive data-related provisions included in the consultation draft.
10	Need for clearer operational focus and reduced redundancy	Some respondents argue that Clause 1 overemphasizes delineation processes rather than focusing on how management should occur within already-identified IFLs. Others consider some elements redundant with existing FSC Clauses or Motion 23 Clauses.	a, f	Clause 1 has been revised to focus on identification. Additionally, the updated version of the Advice Note (Part II, Clauses 5 - 9) covers management provisions.
11	Concerns regarding applicability across contexts	Some comments note that the relationship between IFLs and Indigenous Peoples is not equally relevant in all national contexts and that implementation should reflect ecological, social, and governance realities.	b, d, f	FSC is aware of the different contexts. Phase 2 will consider regionally adapted requirements.

Clause 2: Identification and spatial delineation of critical landscape integrity features

Q.8 Agreement with Clause 2: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 33 participants. Overall, 58% of respondents expressed agreement with the content, clarity, and intent of Clause 2 (agree and fully agree combined), while 30% expressed disagreement (disagree and fully disagree combined). An additional 12% of respondents selected the neutral option Figure 12).

The results indicate a moderate level of support for Clause 2, although a substantial proportion of respondents also expressed concerns regarding the clarity, feasibility, or implementation implications of the proposed requirements.

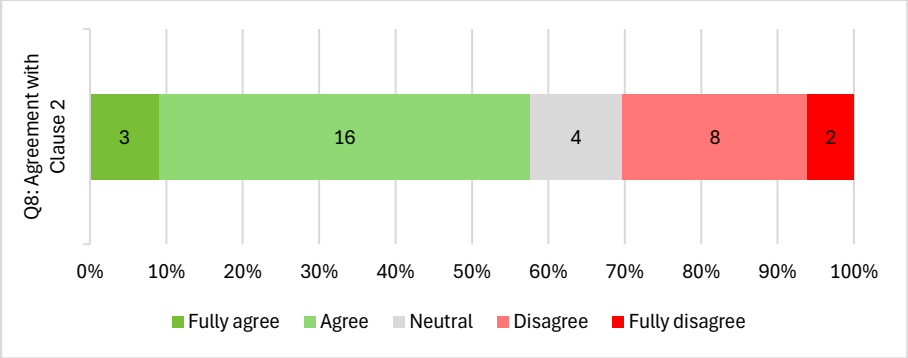

Figure 18 Agreement levels by all respondents for Clause 2

Across stakeholder types, FSC Members showed comparatively mixed responses, although agreement levels were generally higher than disagreement. Certificate Holders also showed relatively positive responses overall, while Certification Bodies/auditors expressed the highest levels of agreement among stakeholder groups. FSC Network Partner staff responses leaned toward disagreement, whereas responses from Consultants and Other stakeholder groups were distributed across agreement, disagreement, and neutral categories. The distribution of responses by stakeholder type is presented in Figure 19.

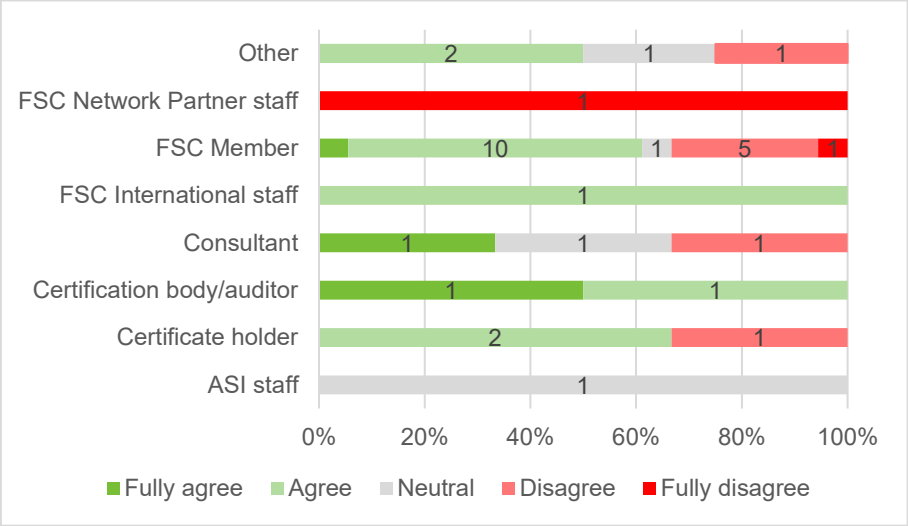

Figure 19 Agreement levels by stakeholder type for Clause 2: number of respondents

Differences across FSC membership chambers were also observed. Economic South and Social South respondents showed comparatively stronger levels of agreement, while Environmental North and Environmental South respondents expressed comparatively higher levels of disagreement. Economic North respondents presented relatively mixed views across agreement and disagreement categories. Respondents identifying as non-members also showed varied responses distributed across all agreement levels. The distribution of responses by chamber is presented in Figure 20.

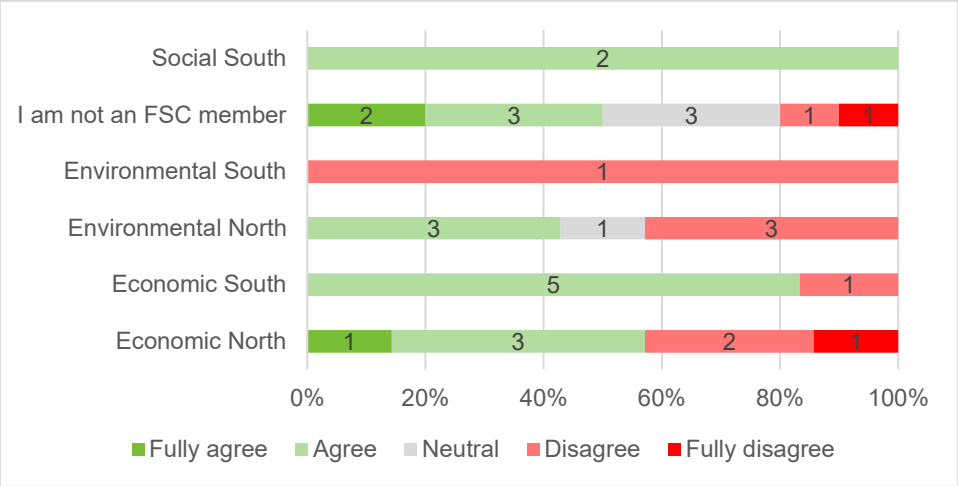

Figure 20 Agreement levels by FSC Membership Chambers for Clause 2: number of respondents

Q.9 Clarity and practical applicability: How clear and practically applicable are the requirements for:

- identifying and delineating critical landscape integrity features
- applying the concept of the Sphere of Influence beyond the Management Unit
- using Best Available Information, including Traditional Ecological Knowledge.

Please select on a scale of 1 to 5. (5 Very clear and applicable; 1 Very unclear or not applicable in practice)

A total of 30 participants responded to this question. Overall, 57% of respondents considered the proposed requirements to be at least moderately clear and applicable in practice (moderately clear/applicable, clear/mostly applicable, and very clear/applicable combined). In contrast, 43% of respondents considered the requirements unclear, difficult to apply, or not applicable in practice (Figure 21).

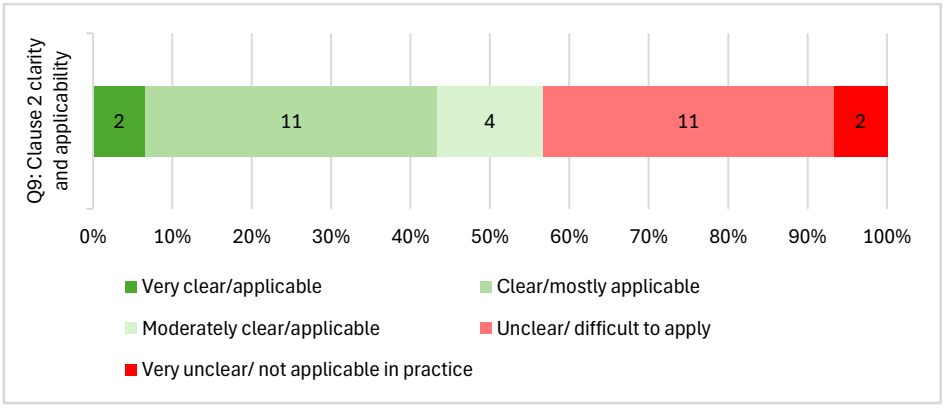

Figure 21 Clarity levels by all respondents for Clause 2.

These results suggest that while a slight majority of respondents considered the proposed concepts and approaches to be generally understandable and implementable, a comparatively large proportion of stakeholders identified significant concerns regarding clarity, operationalization, and practical implementation.

Across stakeholder groups, FSC Members showed comparatively higher levels of concern regarding clarity and applicability, with responses concentrated in the “unclear/difficult to apply” category. FSC Network Partner staff and FSC International staff members also expressed comparatively critical views. Certificate Holders presented more mixed responses, while Certification Bodies/auditors expressed comparatively strong support regarding the clarity and applicability of the proposed requirements. Responses from Consultants and Other stakeholder groups were divided between positive and critical assessments. The distribution of responses by stakeholder type is presented in Figure 22.

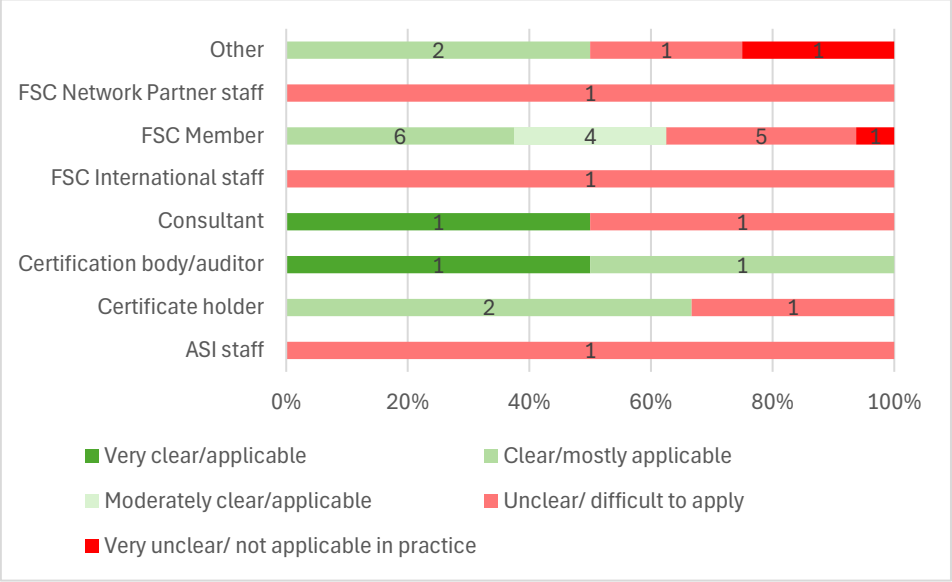

Figure 22 Clarity levels by stakeholder type for Clause 2: number of respondents

Differences among FSC membership chambers were observed. Economic South respondents expressed comparatively more positive assessments overall, while Economic North and Environmental North respondents showed more mixed or critical views regarding practical applicability. Respondents identifying as non-members also showed relatively divided opinions, with responses distributed across both positive and negative categories. The distribution of responses by chamber is presented in Figure 23.

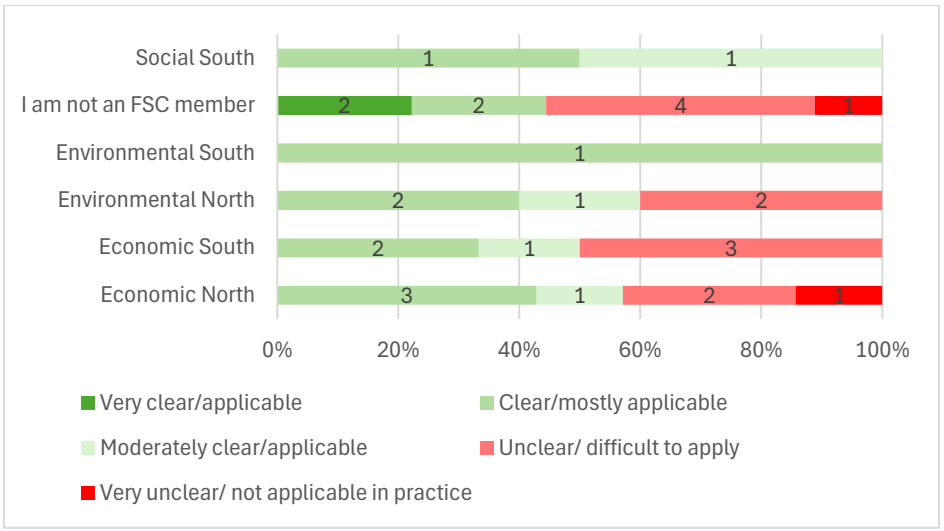

Figure 23 Clarity levels by FSC Membership Chambers for Clause 2: number of respondents

Open feedback for Clause 2

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 2:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause introduces concepts that are too vague, subjective, and insufficiently operationalized, particularly regarding the Sphere of Influence and “critical landscape integrity features.” Several comments also questioned whether the Clause sufficiently maintains intactness as a central objective and aligns coherently with Motion 23 pilot outcomes and Motion 45 simplification objectives.

b) Practical implementation constraints: stakeholders identified challenges related to operationalizing the Sphere of Influence, identifying landscape integrity features across large areas, and applying the Clause consistently in contexts with limited data, technical capacity, or operational control. Several comments stressed that organizations may have limited practical influence outside their Management Units.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently verify organizational influence, identification of landscape integrity features, and implementation expectations in the absence of clear thresholds, methodologies, and evidence requirements.

d) Further clarification or definitions required: multiple comments requested clearer operational definitions and methodological guidance for concepts such as “Sphere of Influence,” “critical landscape integrity features,” “connectivity,” “reference state,” and “Best Available Information,” as well as clearer expectations regarding proportionality and acceptable methodologies.

e) Conflicts with legislation or regulatory frameworks: while no major direct legal conflicts were identified, several respondents raised governance concerns regarding the realistic legal authority of certificate holders to influence landscape-level processes outside their Management Units, particularly in jurisdictions where land-use planning and conservation zoning remain governmental responsibilities.

f) Elements to be revised or recommendations: key recommendations focused on clarifying and limiting the Sphere of Influence, simplifying and streamlining the Clause, strengthening methodological guidance, improving proportionality language, ensuring alignment with Motion 23 pilot work and national methodologies, and maintaining intactness as a central and explicit management objective.

Table 3 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 3 Summary of key feedback from participants for Clause 2: Identification and spatial delineation of critical landscape integrity features

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for the landscape-level and outcome-based approach	Several respondents support the inclusion of “critical landscape integrity features” and the broader landscape-level perspective introduced through the Clause. Positive comments recognize the move away from rigid thresholds and appreciate the effort to integrate ecological integrity, connectivity, and broader landscape considerations into FSC’s IFL approach.	a, f	FSC appreciates the positive feedback on this Clause.
2	Need for stronger alignment with Motion 23 pilot work and national approaches	Several respondents note similarities between the proposed approach and concepts already developed through Motion 23 pilot work, particularly in Canada. Concerns are raised that Clause 2 may duplicate or conflict with already-developed national methodologies and should therefore better align with SDG/NFSS processes and existing pilot outcomes.	a, d, f	Redundancies between the FSS of the M23 pilots and the advice are expected and welcomed. This alignment will enable the IFL requirements to be implemented more smoothly. Furthermore, FSC International will collaborate with NPs and/or SDGs to develop cross-walk documents indicating which requirements overlap, are added, or prevail in the event of an extraordinary discrepancy (see also Table 1, point 4).
3	Sphere of Influence (SOI) considered too vague or difficult to operationalize	The SOI concept emerges as one of the main concerns across comments. Respondents question how far organizations can realistically influence activities outside their Management Units and stress that the SOI should be limited to areas where influence can reasonably be demonstrated. Several comments warn that the concept currently creates excessive uncertainty and subjectivity.	a, b, c, d, f	There is a separate clause regarding measures within the Sphere of Influence, which has been substantially revised to address concerns. In the revised version of the Advice Note, Clause 9 now refers to engagement measures and incorporates a provision to ensure the measures are proportionate to the organisation's scale.
4	Need for clearer definitions and methodological guidance	Multiple respondents request clearer operational definitions and methodologies for “critical landscape integrity features,” “Sphere of Influence,” “connectivity,” “reference state,” and “Best Available Information.” Concerns are raised that these concepts remain too abstract, inconsistent across regions, or difficult to apply in practice.	d, f	The new definitions have been revised to provide greater clarity while remaining flexible enough to be implemented as appropriate in different regions. These definitions are not linked to any specific region.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
5	Clause perceived as overly complex, process-heavy, or insufficiently streamlined	Several comments indicate that the Clause introduces excessive complexity and relies heavily on process-oriented expectations rather than concise and auditable requirements. Respondents repeatedly question whether the proposed approach is proportionate and aligned with the stated Motion 45 objective of reducing complexity.	a, b, c	The revised Clause 2 shifts the focus from identifying integrity features within the Sphere of Influence (SOI) to identifying them within intact forest landscapes (IFLs) and/or larger landscape-level ecosystems or ecoregions. This change increases flexibility and avoids the confusion associated with the artificial boundaries of the SOI. The clause now specifies three categories of integrity features, species, structures and habitats, and large extents of continuous forest, to improve clarity and provide clearer implementation guidance
6	Auditability and consistency concerns	Respondents repeatedly highlight that the Clause may be difficult to audit consistently because many concepts remain open to interpretation. Particular concerns relate to demonstrating influence beyond the Management Unit, verifying “critical landscape integrity features,” and ensuring consistent CB interpretation across regions.	c, d	The Advice Note includes a revised definition of 'Ecological Integrity Features' (previously 'Critical Landscape Integrity Features').
7	Need for proportionality and realistic implementation expectations	Several respondents stress that implementation expectations should remain proportionate to organizational capacity, legal authority, data availability, and actual operational influence. Concerns are particularly strong regarding expectations placed on certificate holders for areas outside their direct management control.	b, e, f	The measures related to the sphere of influence are now set out in a separate clause (No. 9). Concerns regarding expectations in areas outside the control of certificate holders have been addressed in this clause. See point 3.
9	Concerns regarding governance realities and legal authority	Some comments emphasize that certificate holders are not land-use planning authorities and cannot control broader landscape-level decisions. Respondents question how organizations can be held accountable for impacts or management expectations in areas outside their legal authority or operational mandate.	e	This concern was addressed by separating responsibilities within the MU from measures within the Sphere of Influence. The final Clause 2 no longer requires identification and delineation of features throughout the Sphere of Influence, while Clause 9 focuses on proportionate engagement measures based on the Organization's actual capacity to influence external actors and processes. Refer to point 3.
10	Need to maintain intactness as a defining consideration	Some respondents stress that intactness itself should remain central within the Clause and caution against	a, d	The revised version of the Advice Note focuses on maintaining ecological integrity through the identification,

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
		shifting too strongly toward identifying isolated “features” while weakening the broader concept of ecological intactness.		management, and monitoring of ecological integrity features. These include characteristics associated with IFLs and large landscape-level ecosystems, such as species dependent on large, continuous or old-growth forests, continuous natural forest canopy cover, and relevant ecological processes. Refer to point 4 in Table 2.
11	Need for stronger operational focus and clearer management implications	Several comments indicate that the Clause still lacks sufficient clarity regarding how identified features and SOI considerations should concretely influence forest management planning and operational decisions. Respondents request more practical guidance and clearer linkage to management actions.	b, d, f	The Advice Note was restructured to create a clearer sequence between identification, risk assessment, management, and monitoring. Clause 2 now focuses on identifying ecological integrity features, while Clauses 4–6 establish requirements for identifying risks and adjusting forest operations to maintain these features. Refer to point 3.
12	Concerns regarding ecological applicability across biomes and contexts	Some respondents note that certain ecological assumptions or examples may not be equally applicable across all forest types and biomes, particularly in boreal and tropical systems. Respondents request greater contextual flexibility and national adaptation possibilities.	b, d, f	The Advice Note's V2-0 (Phase 2) will address contextual flexibility and adaptation.

Clause 3: Identification and spatial delineation of socio-cultural values

Q.13 Agreement with Clause 3: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 34 participants. Overall, 71% of respondents expressed agreement with the content, clarity, and intent of Clause 3 (agree and fully agree combined), while 12% expressed disagreement (disagree and fully disagree combined). An additional 18% of respondents selected the neutral option (Figure 24).

The results indicate comparatively strong support for Clause 3 among respondents. Compared to previous clauses, disagreement levels were lower and agreement levels were substantially higher, suggesting broader stakeholder acceptance of the proposed direction and intent of the Clause.

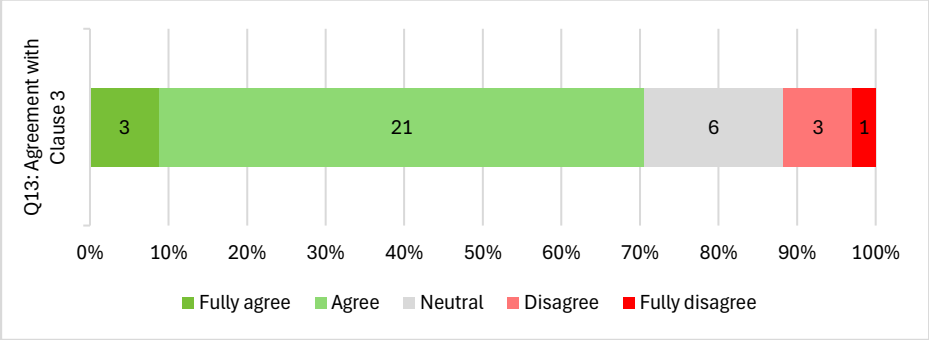

Figure 24 Agreement levels by all respondents for Clause 3

Across stakeholder types, FSC Members showed particularly strong levels of agreement, with most responses concentrated in the "agree" category. Certificate Holders also expressed predominantly positive views, while Certification Bodies/auditors recorded only positive responses. Responses from FSC International staff members were similarly positive. FSC Network Partner staff expressed comparatively more critical views, while Consultants and Other stakeholder groups presented mixed responses distributed across agreement, neutrality, and disagreement categories. The distribution of responses by stakeholder type is presented in Figure 25.

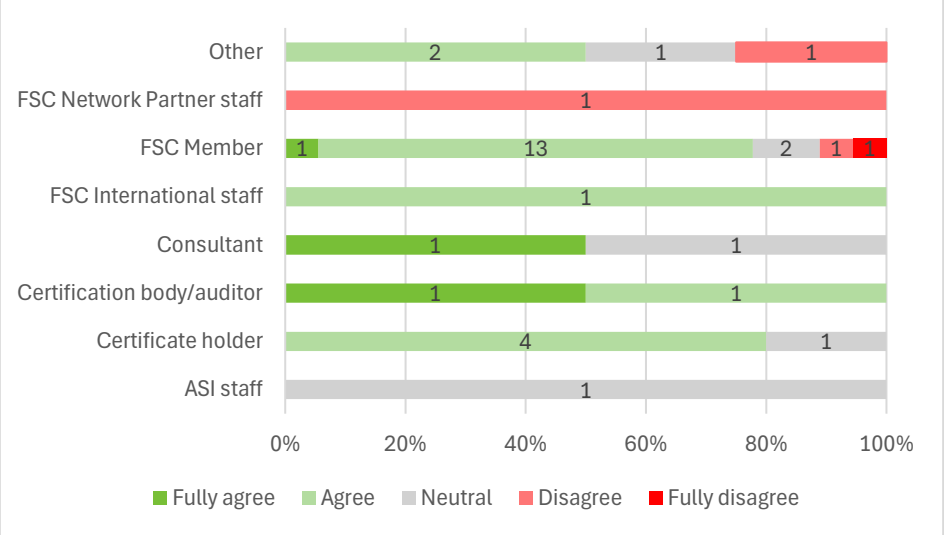

Figure 25 Agreement levels by stakeholder type for Clause 3: number of respondents

Differences across FSC membership chambers were also observed. Economic South, Social South, and Environmental South respondents expressed predominantly positive assessments of the Clause.

Environmental North and Economic North respondents also showed generally positive responses overall, although some disagreement and neutral responses were recorded. Respondents identifying as non-members presented more mixed views distributed across all agreement levels. The distribution of responses by chamber is presented in Figure 26.

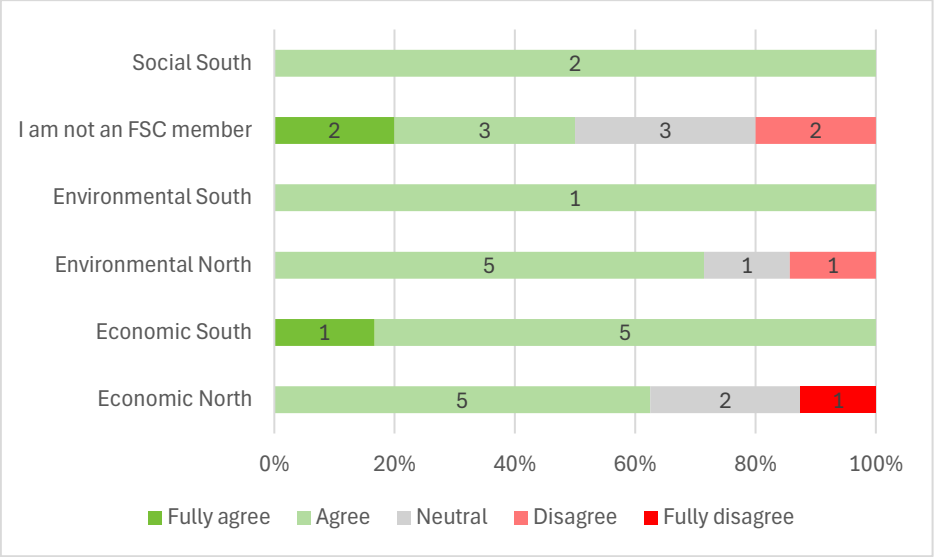

Figure 26 Agreement levels by FSC Membership Chambers for Clause 3: number of respondents

Q.14 FPIC-based approach: To what extent do you agree with the requirement to identify and delineate Indigenous cultural landscapes and socio-cultural values through culturally appropriate engagement based on FPIC? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question assessed stakeholder perspectives regarding the requirement to identify and delineate Indigenous cultural landscapes and socio-cultural values through culturally appropriate engagement based on Free, Prior and Informed Consent (FPIC).

A total of 32 participants responded to this question. Overall, 72% of respondents expressed agreement with the proposed FPIC-based approach (agree and fully agree combined), while 13% expressed disagreement (disagree and fully disagree combined). An additional 16% of respondents selected the neutral option (Figure 27).

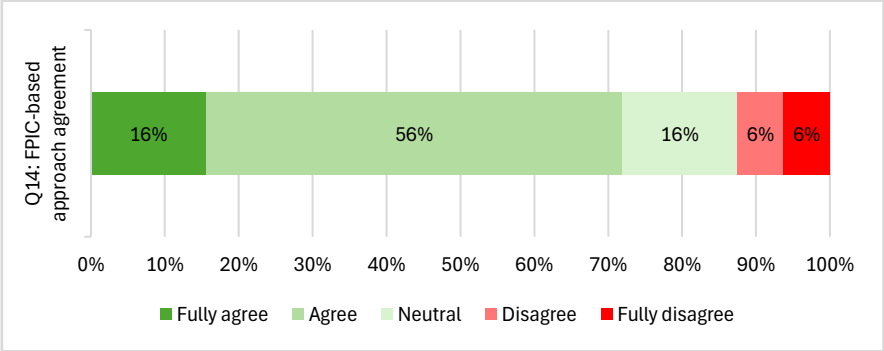

Figure 27 Agreement levels by all respondents for Clause 3 FPIC-based approach.

These results indicate relatively strong support for the inclusion of culturally appropriate engagement and FPIC-based approaches within the proposed Clause. The results suggest that many stakeholders

considered the recognition of Indigenous cultural landscapes and socio-cultural values to be an important component of the proposed framework.

Across stakeholder groups, FSC Members expressed comparatively strong levels of agreement, including several responses in the “fully agree” category. Certificate Holders also generally supported the approach, although one disagreement response was recorded. Certification Bodies/auditors expressed only positive responses, while FSC International staff members also supported the proposed approach. FSC Network Partner staff responses leaned toward disagreement, whereas Consultants and Other stakeholder groups showed more mixed or neutral views. The distribution of responses by stakeholder type is presented in Figure 28.

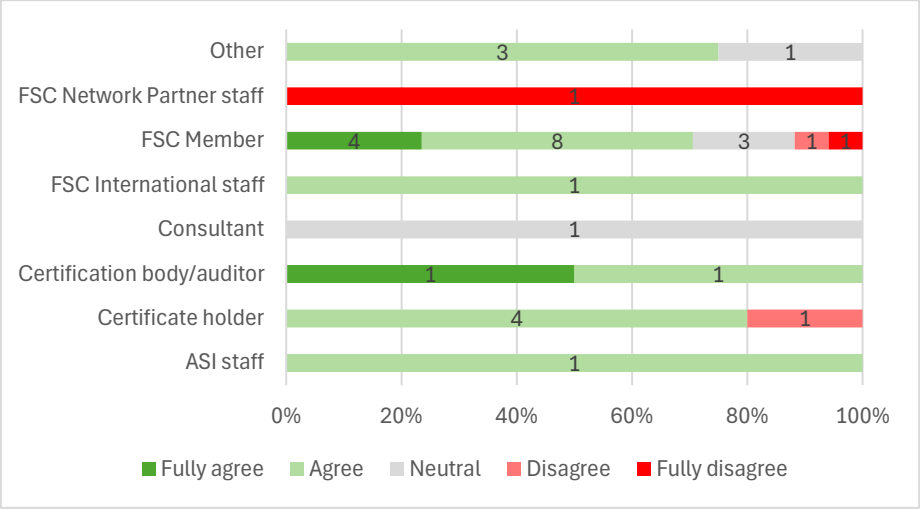

Figure 28 Agreement levels by stakeholder type for Clause 3 FPIC-based approach: number of respondents

Differences among FSC membership chambers were also observed. Economic North, Environmental North, Social South, and Environmental South respondents generally expressed positive assessments of the FPIC-based approach. Economic South respondents also showed mostly positive responses, although one disagreement and one neutral response were recorded. Respondents identifying as non-members presented relatively mixed views, with responses distributed across agreement, neutrality, and disagreement categories. The distribution of responses by chamber is presented in Figure 29.

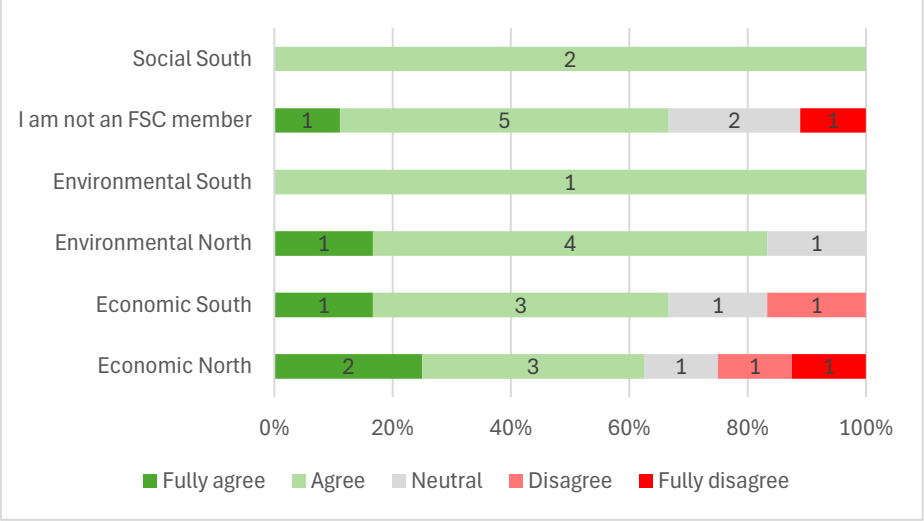

Figure 29 Agreement levels by FSC Membership Chambers for Clause 3 FPIC-based approach: number of respondents

Open feedback for Clause 3

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 3:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause relies on broad socio-cultural concepts that remain insufficiently operationalized and may create inconsistent interpretation across contexts. Several comments also questioned whether the Clause provides sufficient practical guidance for implementation.

b) Practical implementation constraints: stakeholders identified challenges related to conducting culturally appropriate FPIC processes, identifying Indigenous cultural landscapes consistently across regions, and adapting implementation to diverse governance, cultural, and legal contexts.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently verify FPIC implementation, delineation of Indigenous cultural landscapes, and culturally appropriate engagement processes in the absence of standardized methodologies and clearly defined expectations.

d) Further clarification or definitions required: multiple comments requested clearer definitions and operational guidance for concepts such as “Indigenous cultural landscapes,” “socio-cultural values,” FPIC implementation processes, delineation methodologies, and expectations regarding engagement and documentation.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised concerns regarding differing national Indigenous rights frameworks and governance systems that may influence implementation approaches.

f) Elements to be revised or recommendations: key recommendations focused on clarifying definitions and methodologies, strengthening guidance for FPIC implementation, ensuring culturally appropriate and context-specific approaches, improving the linkage between socio-cultural values and operational management, and reducing ambiguity and excessive interpretive burden.

Table 4 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 4 Summary of key feedback from participants for Clause 3: Identification and spatial delineation of socio-cultural values

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for FPIC-based and culturally appropriate engagement approaches	Several respondents support the requirement to identify and delineate Indigenous cultural landscapes and socio-cultural values through culturally appropriate engagement processes based on FPIC. Positive comments recognize the importance of strengthening Indigenous participation and integrating socio-cultural dimensions into IFL management.	a, f	FSC appreciates the support and positive feedback regarding this clause.
2	Need for clearer operational definitions of Indigenous cultural landscapes	A major recurring concern is that the concept of “Indigenous cultural landscapes” remains insufficiently defined, context-dependent, and potentially difficult to operationalize consistently across regions. Several respondents request clearer definitions, examples, and methodologies.	d, f	Indigenous cultural landscapes (ICLs) are not a new concept and are already defined in the current IGI V2-1. The final Clause also provides greater implementation flexibility through culturally appropriate engagement and FPIC where required, recognizing that identification and delineation need to reflect the specific context of affected Indigenous Peoples and traditional peoples. To support stakeholders in this regard, FSC has started to develop a guidance on sociocultural values.
3	Clause considered conceptually broad or difficult to operationalize	Some respondents indicate that the Clause relies on broad socio-cultural concepts without sufficiently clear operational expectations or measurable criteria. Concerns are raised regarding practical implementation and consistency across different Indigenous and regional contexts.	a, b, c, d	The Clause was revised to provide greater flexibility and clarity. It now requires identification and/or spatial delineation, rather than mandatory spatial delineation in all cases, and explicitly allows other means to be used where Indigenous Peoples and/or traditional peoples determine that physical documentation or mapping could threaten the value or its protection.
4	Need for culturally appropriate and context-specific implementation	Several comments emphasize that FPIC processes, Indigenous cultural landscapes, and socio-cultural values differ significantly across communities and regions, requiring contextual flexibility and culturally appropriate engagement methodologies rather than standardized approaches.	b, d, f	This concern is recognized in the revised Clause, which requires culturally appropriate engagement and FPIC where required. The revised wording allows implementation to reflect the specific cultural and governance context and provides flexibility regarding whether values are identified, spatially delineated, or documented through other appropriate means.
5	Auditability and verification concerns	Respondents question how certification bodies will consistently verify culturally appropriate engagement	c, d	The Clause was revised to clarify the process for identifying and/or spatially delineating Indigenous

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
		processes, delineation of Indigenous cultural landscapes, and adequacy of FPIC implementation. Concerns are raised regarding subjectivity and variability across contexts.		cultural landscapes and socio-cultural values, including the use of culturally appropriate engagement, FPIC where required, and Best Available Information. To support consistent implementation and verification across different context, FSC has started to develop a guidance on sociocultural values.
6	Need for stronger guidance regarding FPIC implementation	Several comments request clearer operational guidance regarding how FPIC processes should be conducted in the context of identifying and delineating Indigenous cultural landscapes and socio-cultural values. Respondents ask for clearer procedural expectations and roles.	d, f	FSC encourages stakeholders to refer to the FPIC guidance.
7	Concerns regarding applicability across national and governance contexts	Some respondents note that Indigenous rights frameworks, governance structures, and cultural landscape concepts vary significantly across countries and regions, requiring flexibility in implementation approaches.	b, d, f	This concern is recognized. As noted under point 2, the requirement for culturally appropriate engagement and, where required, FPIC allows implementation to reflect the specific cultural and contextual circumstances of affected Indigenous Peoples and traditional peoples
8	Need for clearer linkage between socio-cultural values and operational management	Several comments indicate that the Clause does not sufficiently explain how identified socio-cultural values and Indigenous cultural landscapes should influence operational planning, management decisions, or protection measures.	b, d, f	Clause 3 has been revised to focus more clearly on the identification and, where appropriate, spatial delineation of Indigenous cultural landscapes and socio-cultural values. Requirements for their management, protection, monitoring, and integration into adaptive management are addressed in subsequent Clauses of the Advice Note.
9	Concerns regarding excessive complexity and interpretive burden	Some respondents reiterate broader concerns that the Advice Note introduces highly interpretive socio-cultural concepts that may increase inconsistency and implementation complexity across FSC-certified operations.	a, c, f	A definition of “socio-cultural values” has been included in the Advice Note, providing greater clarity while retaining the flexibility needed to reflect different cultural and contextual circumstances, as also requested by other respondents. To support stakeholders in this regard, FSC has started to develop a guidance on sociocultural values.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
10	General recognition of the importance of socio-cultural integration in IFL management	Several respondents positively acknowledge that integrating Indigenous cultural landscapes and socio-cultural values into IFL management strengthens the broader landscape approach promoted under Motion 45.	a, f	FSC appreciates the positive feedback and recognition of the importance of integrating Indigenous cultural landscapes and socio-cultural values into IFL management.
11	Concerns regarding ecological applicability across biomes and contexts	Some respondents note that certain ecological assumptions or examples may not be equally applicable across all forest types and biomes, particularly in boreal and tropical systems. Respondents request greater contextual flexibility and national adaptation possibilities.	b, d, f	Contextual flexibility and further adaptation of the requirements will be considered through V2-0 (Phase 2) of the Advice Note.

Clause 4: Inclusion of specified measures to prevent any degradation of the critical landscape integrity features and socio-cultural values in management plan

Q.18 Agreement with Clause 4: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 31 participants. Overall, 52% of respondents expressed agreement with the content, clarity, and intent of Clause 4 (agree and fully agree combined), while 32% expressed disagreement (disagree and fully disagree combined). An additional 16% of respondents selected the neutral option (Figure 30).

The results indicate moderate support for Clause 4, although responses also reveal a comparatively significant proportion of disagreement among some stakeholder groups. Compared to previous clauses, the results suggest that stakeholders identified greater concerns regarding the clarity, scope, or implementation implications of the proposed requirements.

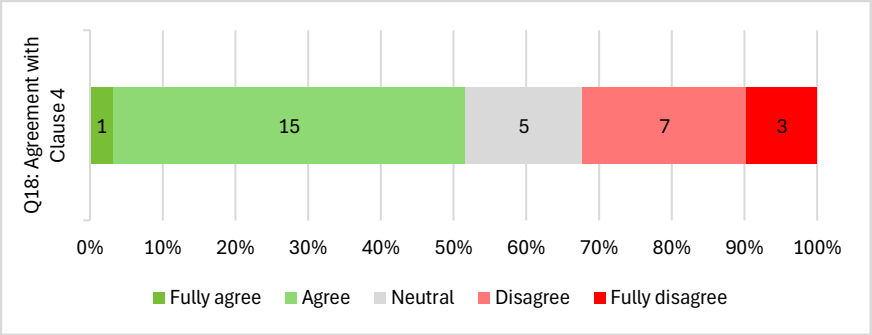

Figure 30 Agreement levels by all respondents for Clause 4

Across stakeholder types, FSC Members showed comparatively mixed responses, with disagreement levels relatively close to agreement levels. Certificate Holders also presented mixed views distributed across agreement, neutrality, and disagreement categories. Certification Bodies/auditors expressed only positive responses, while FSC International staff members also showed positive assessments. FSC Network Partner staff responses leaned toward disagreement, and responses from Consultants and Other stakeholder groups were distributed across multiple response categories. The distribution of responses by stakeholder type is presented in Figure 31.

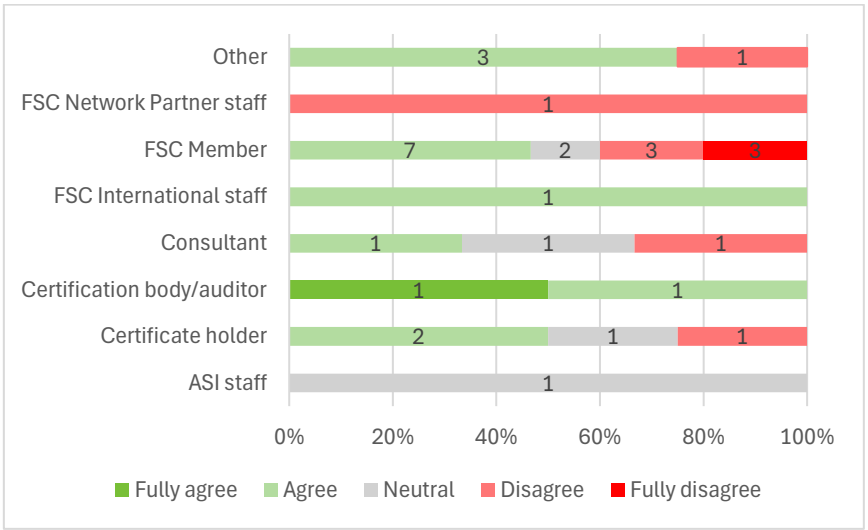

Figure 31 Agreement levels by stakeholder type for Clause 4: number of respondents

Differences across FSC membership chambers were also observed. Economic South respondents expressed predominantly positive assessments of the Clause, while Environmental North respondents showed comparatively higher levels of disagreement. Economic North respondents also presented mixed responses across agreement and disagreement categories. Respondents identifying as non-members generally showed more positive assessments overall, although neutral and disagreement responses were also recorded. The distribution of responses by chamber is presented in Figure 32.

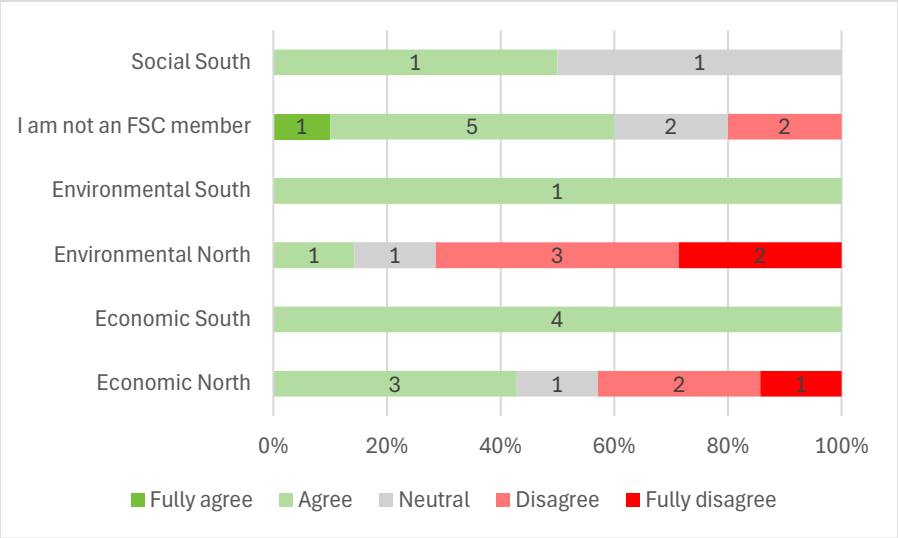

Figure 32 Agreement levels by FSC Membership Chambers for Clause 4: number of respondents

Q.19 Feasibility and auditability: To what extent is this Clause feasible to implement and auditable in practice, particularly regarding:

- identifying risks within the Sphere of Influence
- integrating targets and mitigation measures into the management plan
- ensuring effective prevention of degradation

Please select on a scale of 1 to 5. (5 Fully feasible and auditable; 1 Not feasible or auditable)

A total of 28 participants responded to this question. Overall, 79% of respondents considered the proposed requirements to be at least moderately feasible and auditable in practice (moderately feasible/auditable, mostly feasible/auditable, and fully feasible/auditable combined). In contrast, 21% of respondents considered the requirements difficult or not feasible to implement and audit in practice (Figure 33).

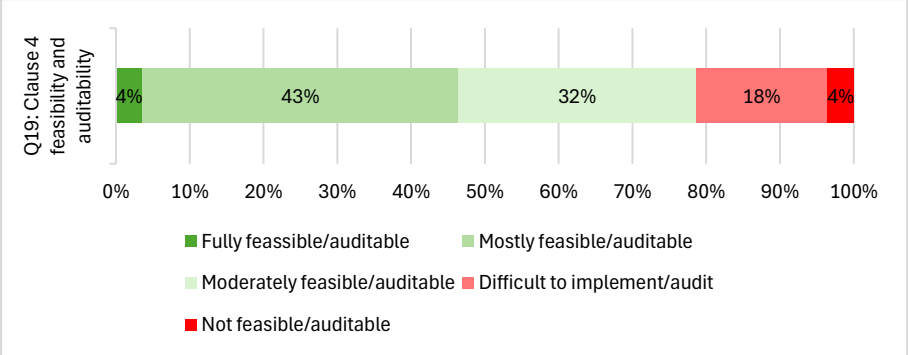

Figure 33 Feasibility and auditability levels by all respondents for Clause 4.

These results suggest that a majority of respondents considered the proposed requirements to be generally feasible and auditable, although a notable proportion of stakeholders continued to identify implementation and verification challenges, particularly regarding the practical application of the Sphere of Influence concept and the operationalization of landscape-level mitigation measures.

Across stakeholder groups, FSC Members generally considered the requirements to be moderately or mostly feasible and auditable, although some critical responses were also recorded. Certificate Holders presented relatively mixed responses, while Certification Bodies/auditors expressed comparatively strong confidence regarding feasibility and auditability. FSC Network Partner staff and FSC International staff members showed more moderate assessments overall. Responses from Consultants and Other stakeholder groups generally leaned toward positive assessments. The distribution of responses by stakeholder type is presented in Figure 34.

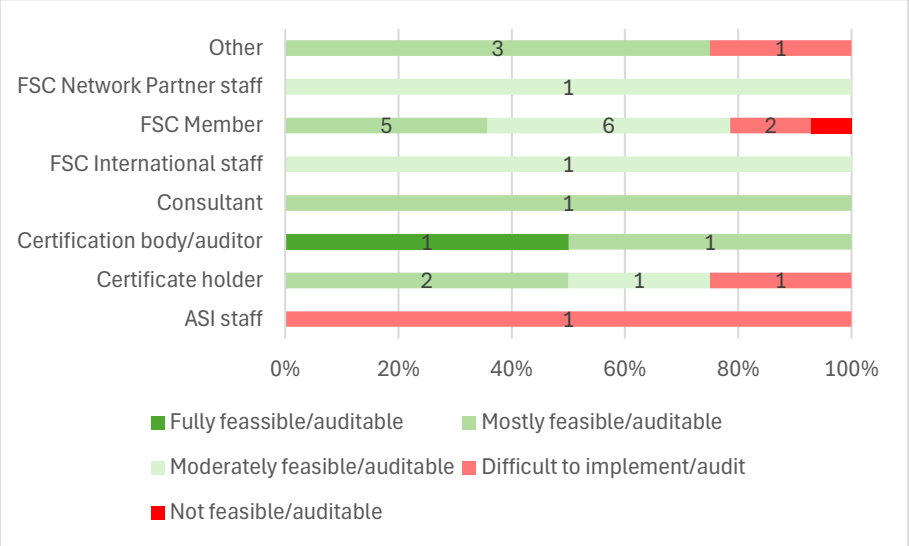

Figure 34 Feasibility and auditability levels by stakeholder type for Clause 4: number of respondents

Differences among FSC membership chambers were also observed. Economic South respondents expressed comparatively stronger confidence regarding feasibility and auditability, while Environmental North and Economic North respondents showed more mixed views, including some responses in the “difficult to implement/audit” categories. Respondents identifying as non-members generally considered the requirements feasible and auditable overall, although some disagreement responses were also recorded. The distribution of responses by chamber is presented in Figure 35.

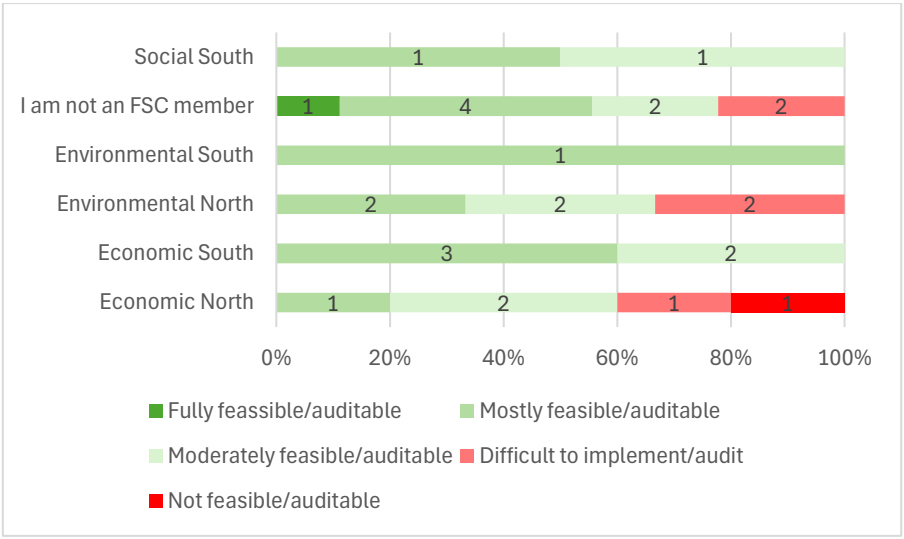

Figure 35 Feasibility and auditability levels by FSC Membership Chambers for Clause 4: number of respondents

Open feedback for Clause 4

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 4:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause remains too vague, overly process-oriented, and insufficiently aligned with Motion 45 objectives and Motion 23 pilot work. Several comments also noted that the Clause does not sufficiently maintain intactness as a defining feature of IFLs and lacks clear operational management measures.

b) Practical implementation constraints: stakeholders identified challenges related to operationalizing the Sphere of Influence, identifying and managing external risks, and implementing mitigation measures beyond the Management Unit. Concerns were also raised regarding proportionality, technical burden, stakeholder engagement challenges, and monitoring costs.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently verify degradation, recovery, effective mitigation, and influence outside the Management Unit in the absence of measurable thresholds and clearly defined evidence expectations.

d) Further clarification or definitions required: multiple comments requested clearer definitions and methodologies for concepts such as “degradation,” “effective mitigation,” “Sphere of Influence,” “critical landscape integrity features,” “recovery,” and “reference state,” as well as clearer distinctions between obligations of means and obligations of results.

e) Conflicts with legislation or regulatory frameworks: while no major direct legal conflicts were identified, several respondents raised concerns regarding the realistic authority of certificate holders to influence or control activities outside their Management Units, particularly where broader landscape planning responsibilities remain governmental functions.

f) Elements to be revised or recommendations: key recommendations focused on clarifying and limiting the Sphere of Influence, introducing clearer degradation and recovery thresholds, strengthening operational management requirements, improving auditability and monitoring expectations, aligning more closely with Motion 23 pilot approaches and national methodologies, and ensuring proportionality and clearer distinctions between direct responsibility and indirect influence.

Table 5 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 5 Summary of key feedback from participants for Clause 4: Inclusion of specified measures to prevent any degradation of the critical landscape integrity features and socio-cultural values in management plan

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for the intent and planning logic of the Clause	Several respondents support the overall intent of translating identified IFL and socio-cultural risks into management planning, targets, and mitigation measures. The Clause is generally seen as directionally aligned with Motion 45 and with adaptive management approaches already present in FSC systems.	a, f	FSC appreciates the positive feedback on this clause.
2	Need for stronger alignment with Motion 23 pilot work and existing national approaches	Several respondents, particularly from Canada, stress that the Clause should better align with Motion 23 pilot Clauses and existing NFSS requirements. Concerns are raised that the Clause may duplicate or conflict with already-developed planning and risk-management approaches.	a, d, f	The interaction with the Motion 23 FSS is clarified in the Advice Note, which complements rather than replaces existing IFL requirements. Additional measures are planned to facilitate implementation, including collaboration with Network Partners and/or Standard Development Groups to develop crosswalk documents clarifying overlaps and additional requirements.
3	Sphere of Influence (SOI) remains one of the major concerns	The SOI concept is repeatedly identified as unclear, too broad, or unrealistic in practice. Respondents question the extent to which organizations can be held responsible for external risks or activities outside their Management Units, particularly illegal activities, actions of third parties, or regional-scale drivers of degradation. Several comments request clearer limits between responsibility and influence.	a, b, c, d, e, f	The approach to the Sphere of Influence was substantially revised. Clause 4 now focuses on identifying and documenting risks and threats, while measures within the Sphere of Influence are addressed separately in Clause 9. These measures focus on engagement and shall be proportionate to the Organization's scale and its capacity to influence external actors and processes.
4	Need for clearer definitions and thresholds related to degradation	A major recurring concern relates to the lack of clear definitions and measurable parameters for “degradation,” “effective mitigation,” “recovery,” and “critical landscape integrity features.” Respondents request clearer thresholds, recovery expectations, and methodologies to ensure consistent interpretation and implementation.	a, c, d, f	Clause 4 was substantially revised and no longer requires the Organization to define targets and mitigation measures to prevent “any degradation.” It now focuses specifically on identifying and documenting risks and threats to ecological integrity features and socio-cultural values, based on specified sources of Best Available Information. Requirements for maintaining these features

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
				and values and addressing identified risks are covered separately under subsequent management Clauses.
5	Clause perceived as too vague, subjective, or difficult to operationalize	Several comments indicate that the Clause remains overly conceptual and process-oriented, making it difficult to understand what organizations are concretely expected to deliver in practice. Respondents repeatedly stress the need for more operational, measurable, and auditable requirements.	a, b, c, d	The Clause was substantially revised to provide a clearer and more specific focus on the identification and documentation of risks and threats. It also specifies the types of Best Available Information to be considered, while requirements for operational responses are addressed separately in subsequent Clauses.
6	Auditability and verification concerns	Respondents question how certification bodies will consistently verify whether risks were adequately identified, whether mitigation measures are effective, and whether degradation has occurred. Concerns are raised regarding subjectivity, lack of measurable thresholds, and absence of robust monitoring methodologies.	c, d, f	The Clause was restructured to improve clarity and auditability. Clause 4 now focuses specifically on identifying and documenting risks and threats and specifies the information sources to be considered. Requirements for addressing identified risks through forest operations within the MU, engagement within the Sphere of Influence, and subsequent monitoring are addressed separately in later Clauses, providing a clearer structure for implementation and verification.
7	Need for clearer operational and measurable mitigation measures	Several respondents argue that the Clause lacks sufficiently concrete management measures and mitigation expectations. Particular emphasis is placed on the absence of explicit Reduced Impact Logging (RIL), minimal impact management, measurable protection measures, or clear planning requirements to maintain intactness and ecological integrity.	a, f	Clause 4 was revised and no longer addresses mitigation measures directly. It now focuses on identifying and documenting risks and threats, while operational measures to address these risks are covered in subsequent management Clauses. Further region specific requirements will be considered as part of V2-0 (Phase 2) of the Advice Note.
8	Need to maintain intactness as a defining requirement	Several comments stress that intactness should remain explicitly central to the Clause and to the definition of critical landscape integrity features. Respondents are concerned that the current drafting weakens the maintenance of intactness and lacks clear safeguards against degradation or permanent loss of IFL values.	a, d, f	The term 'intactness' is not explicitly used within Ecological Integrity Features. This reflects the view that maintaining ecological integrity is a clearer and more appropriate objective for organizations managing IFL areas than maintaining 'intactness'. It was considered that reintroducing intactness as a standalone term would create confusion regarding operational expectations for

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
				Intact Forest Landscapes (IFLs). Nevertheless, the concept of intactness remains implicitly embedded across the identified integrity features. By maintaining these features, intactness is effectively preserved through a continuum approach, rather than a binary intact/non-intact framing.
9	Need for clearer distinction between obligations inside vs outside the Management Unit	Multiple respondents request clarification that planning obligations and mitigation measures should apply proportionally and realistically, particularly distinguishing what organizations are expected to implement directly within the Management Unit versus what they may influence externally.	b, c, d, e	The clause specifically focuses on identifying risks for both the management unit and the sphere of influence. Measures to address risk, as well as specific measures regarding the SOI, are set out in a separate clause. This clause has been substantially revised in response to concerns. In the revised version of the Advice Note, Clause 9 now refers to engagement measures and incorporates a provision to ensure that these measures are proportionate to the organisation's scale.
10	Need for proportionality and feasibility	Several respondents emphasize that implementation expectations should remain feasible and proportionate, particularly regarding monitoring costs, risk assessments outside the MU, and technical capacity limitations. Concerns are raised that broad SOI obligations may create excessive burden and costs for certificate holders.	b, c, f	The revised structure provides a clearer distinction between operational responsibilities within the MU and engagement within the Sphere of Influence. In particular, Clause 9 specifies that engagement measures shall be proportionate to the Organization's scale and its capacity to influence external actors and processes.
11	Concerns regarding governance realities and legal authority	Some respondents note that organizations cannot realistically control all external risks and that broader landscape governance responsibilities often fall under governmental authorities rather than certificate holders.	b, e	This concern is recognized in the revised approach, which distinguishes between the Organization's operational responsibilities within the MU and its engagement within the SOI. Clause 9 does not require the Organization to control external actors but requires proportionate engagement measures based on its scale and actual capacity to influence external actors and processes. See point 3 and 9.

3. Clauses related to managing

Clause 5: Implement and adapt forest operations to ensure that the critical landscape integrity features can recover.

Q.23 Agreement with Clause 5: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 33 participants. Overall, 48% of respondents expressed agreement with the content, clarity, and intent of Clause 5 (agree and fully agree combined), while 36% expressed disagreement (disagree and fully disagree combined). An additional 15% of respondents selected the neutral option (Figure 36). The results indicate relatively divided stakeholder views regarding Clause 5. While a slight majority of respondents expressed support for the Clause, disagreement levels were comparatively high, suggesting significant concerns regarding the clarity, feasibility, or operational implications of the proposed requirements.

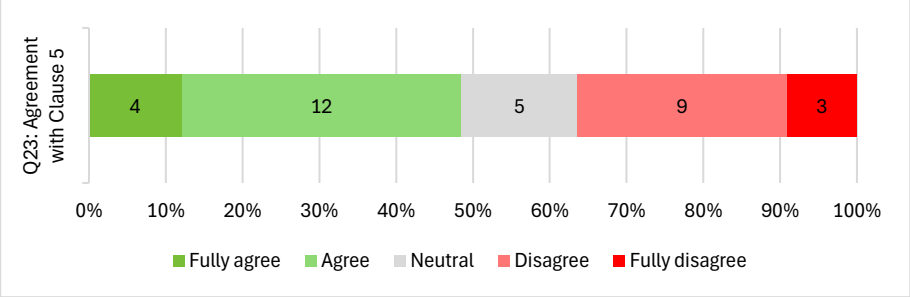

Figure 36 Agreement levels by all respondents for Clause 5

Across stakeholder types, FSC Members showed comparatively higher levels of disagreement, particularly within the “disagree” category. FSC Network Partner staff responses also leaned toward disagreement. In contrast, Certificate Holders and Certification Bodies/auditors expressed predominantly positive responses, including several “fully agree” responses. Responses from Consultants and Other stakeholder groups were more mixed across agreement, disagreement, and neutral categories. The distribution of responses by stakeholder type is presented in Figure 37.

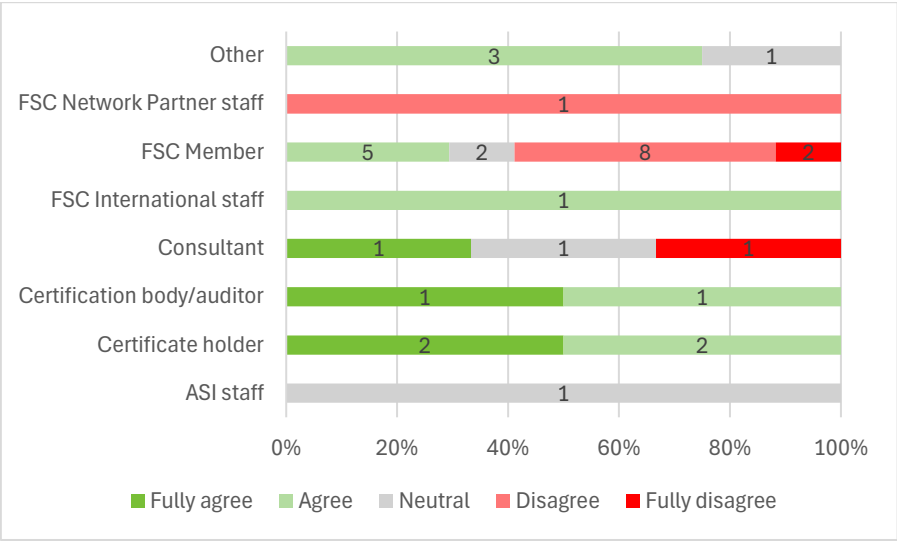

Figure 37 Agreement levels by stakeholder type for Clause 5: number of respondents

Differences across FSC membership chambers were also observed. Environmental North respondents showed comparatively higher levels of disagreement, while Economic South and Social South respondents expressed predominantly positive assessments of the Clause. Economic North respondents presented mixed views distributed across agreement and disagreement categories. Respondents identifying as non-members generally expressed more positive assessments overall, although neutral and disagreement responses were also recorded. The distribution of responses by chamber is presented in Figure 38.

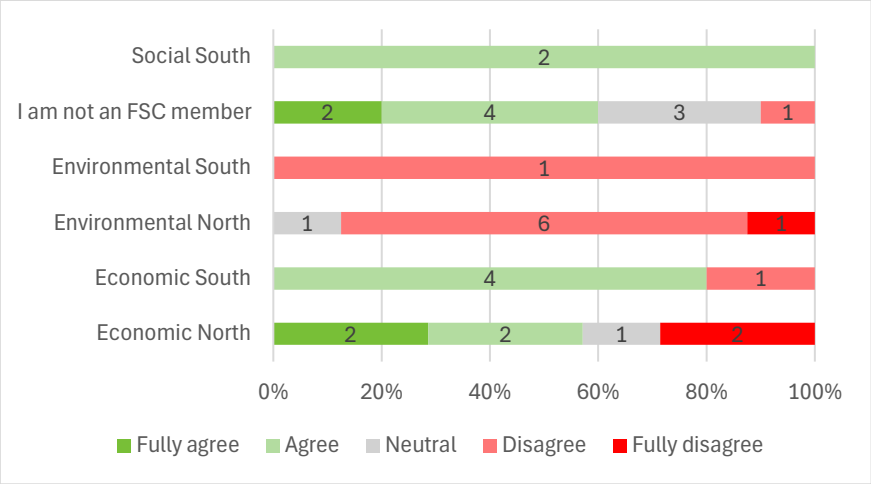

Figure 38 Agreement levels by FSC Membership Chambers for Clause 5: number of respondents

Q.24 Feasibility and auditability: To what extent is this Clause feasible to implement and auditable in practice, particularly regarding:

- adapting forest operations to support recovery
- assessing recovery of critical landscape integrity features
- comparing recovery to a reference state

Please select on a scale of 1 to 5. (5 Fully feasible and auditable; 1 Not feasible or auditable)

A total of 31 participants responded to this question. Overall, 61% of respondents considered the proposed requirements to be at least moderately feasible and auditable in practice (moderately feasible/auditable, mostly feasible/auditable, and fully feasible/auditable combined). In contrast, 39% of respondents considered the requirements difficult or not feasible to implement and audit in practice (Figure 39).

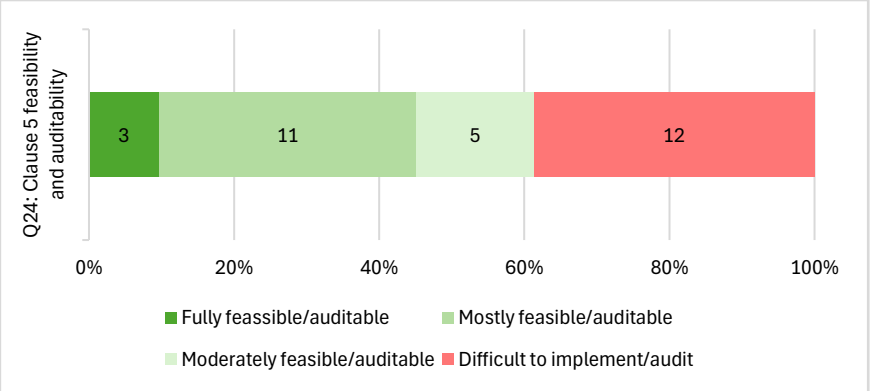

Figure 39 Feasibility and auditability levels by all respondents for Clause 5.

These results indicate comparatively more divided views regarding the practical implementation and verification of Clause 5 compared to several previous clauses. While a majority of respondents considered the Clause feasible and auditable overall, a substantial proportion of stakeholders raised concerns regarding the operationalization of recovery-related concepts and the ability to assess recovery consistently in practice.

Across stakeholder groups, FSC Members showed comparatively higher levels of concern regarding feasibility and auditability, with several responses concentrated in the “difficult to implement/audit” category. FSC Network Partner staff and ASI staff also expressed comparatively critical assessments. In contrast, Certificate Holders and Certification Bodies/auditors generally considered the requirements feasible and auditable. Responses from Consultants and Other stakeholder groups were more mixed across positive and critical categories. The distribution of responses by stakeholder type is presented in Figure 40.

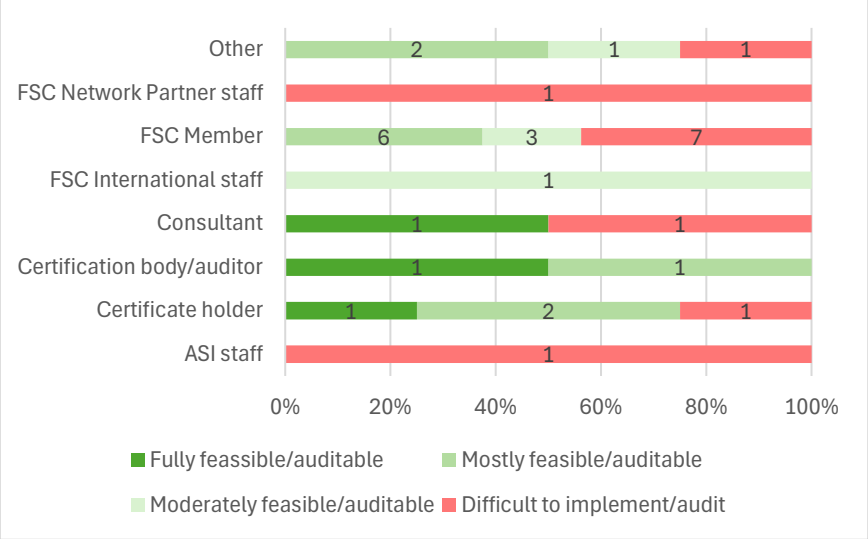

Figure 40 Feasibility and auditability levels by stakeholder type for Clause 5: number of respondents

Differences among FSC membership chambers were also observed. Environmental North and Economic North respondents showed comparatively higher levels of concern regarding implementation feasibility and auditability, while Economic South respondents expressed generally more positive assessments overall. Respondents identifying as non-members also showed relatively mixed views, with responses distributed across both positive and difficult-to-implement categories. The distribution of responses by chamber is presented in Figure 41.

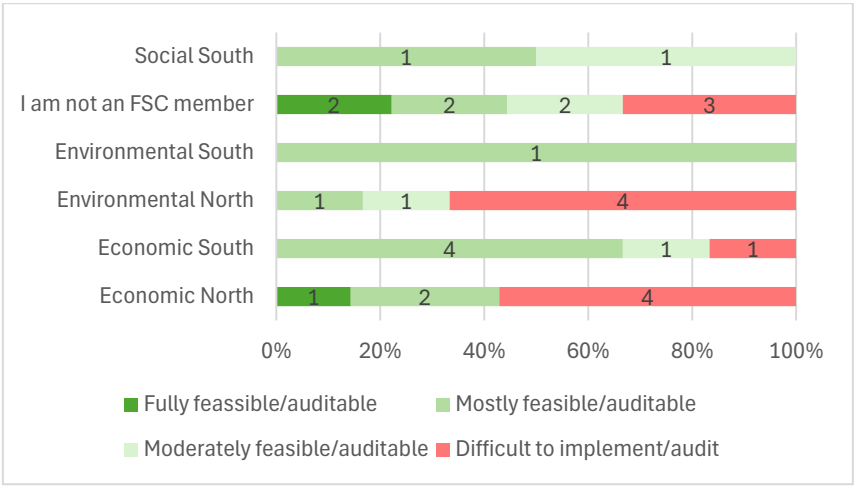

Figure 41 Feasibility and auditability levels by FSC Membership Chambers for Clause 5: number of respondents

Open feedback for Clause 5

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 5:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause weakens intactness as the defining objective of IFL management by shifting toward a recovery-based approach that may permit significant degradation without sufficiently clear safeguards or ecological limits. Several comments also questioned alignment with Motion 45, Motion 43, and FSC's HCV framework.

b) Practical implementation constraints: stakeholders identified challenges related to applying recovery-based management approaches in practice, particularly considering long ecological recovery times, uncertainty regarding ecosystem resilience, lack of operational management requirements, and the technical and financial burden associated with recovery monitoring. Several comments also requested clearer Reduced Impact Logging and minimal impact management requirements.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently verify degradation, recovery, and maintenance of ecological integrity in the absence of measurable thresholds and clearly defined ecological expectations. Concerns were also raised regarding the use of "reference state" and the potential for inconsistent or subjective baseline definitions.

d) Further clarification or definitions required: multiple comments requested clearer definitions and methodologies for concepts such as "recovery," "degradation," "reference state," "critical landscape integrity features," acceptable recovery trajectories, and measurable ecological thresholds, as well as clearer guidance regarding temporary disturbance versus long-term degradation.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised concerns regarding the feasibility of implementing strict recovery expectations within existing forest management and governance systems.

f) Elements to be revised or recommendations: key recommendations focused on explicitly maintaining intactness as a central objective, introducing clearer operational management requirements, establishing measurable degradation and recovery thresholds, improving auditability and ecological enforceability, strengthening alignment with Motion 45 and the HCV framework, and reducing ambiguity and excessive process-oriented wording.

Table 6 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 6 Summary of key feedback from participants for Clause 5: Implement and adapt forest operations to ensure that the critical landscape integrity features can recover

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for the shift toward recovery-based management approaches	Several respondents support the transition from maintaining "intactness" through fixed thresholds toward a recovery-oriented and adaptive management approach focused on maintaining ecological functions and critical landscape integrity features over time. Some comments recognize the Clause as more realistic and ecologically grounded than previous approaches.	a, f	FSC appreciates the positive feedback on the overall management approach. The Clause has since been substantially revised, moving away from a recovery-based approach and focusing instead on maintaining ecological integrity features and socio-cultural values over time.
2	Need to maintain intactness as a central management objective	A major recurring concern is that the Clause weakens or abandons intactness as the defining characteristic of IFL management. Several respondents argue that recovery-based logic may allow significant degradation or permanent loss of IFL values without sufficiently clear limits or safeguards.	a, c, d, f	The term "intactness" is not explicitly used within the concept of Ecological Integrity Features. This reflects the view that maintaining ecological integrity provides a clearer and more operational objective for organizations managing IFL areas. However, the concept of intactness remains embedded across the identified ecological integrity features. By maintaining these features over time, the revised Advice Note seeks to preserve the characteristics associated with intactness through a continuum approach rather than a binary intact/non-intact framing.
3	Absence of clear operational management requirements (e.g. RIL / MIM)	One of the strongest themes across comments is the lack of explicit operational management measures to minimize impacts on IFLs. Several respondents request clearer requirements related to Reduced Impact Logging (RIL), minimal impact management (MIM), retention thresholds, harvesting intensity reduction, road density control, and canopy protection measures.	a, b, f	Specific provisions on operational approaches such as Reduced Impact Logging (RIL) and Minimal Impact Management (MIM) were identified as more appropriately addressed through V2-0 of the Advice Note, to be developed during Phase 2.
4	Clause perceived as too vague, process-based, or insufficiently measurable	Several respondents argue that the Clause remains overly conceptual and process-oriented, relying on broad recovery concepts without sufficiently measurable or auditable thresholds. Concerns are raised that the wording	a, c, d	The Clause was substantially revised. Rather than focusing on recovery after disturbance, the revised Advice Note requires forest operations to be adjusted to address the risks and threats identified under Clause 4, maintain

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
		allows excessive interpretation and uncertainty regarding what level of impact is acceptable.		ecological integrity features and socio-cultural values over time, and avoid cumulative impacts that could compromise their maintenance.
5	Need for clearer definitions of recovery, degradation, and reference conditions	Multiple comments request clearer operational definitions for “recovery,” “degradation,” “critical landscape integrity features,” “reference state,” and acceptable recovery trajectories. Several respondents stress that recovery timeframes, temporary disturbance allowances, and measurable ecological expectations remain unclear. Concerns are also raised that organizations could subjectively define their own baselines if “reference state” is not more rigorously specified.	d, f	The Clause was substantially revised and moved away from the previous recovery-based provisions. The revised approach focuses instead on maintaining ecological integrity features and socio-cultural values over time and adjusting forest operations based on identified risks and threats.
6	Auditability and verification concerns	Respondents repeatedly question how certification bodies will consistently verify whether recovery is occurring, whether degradation thresholds have been exceeded, and whether management interventions are sufficient to maintain ecological integrity. Concerns are particularly strong regarding long-term recovery assumptions, the absence of enforceable ecological thresholds, and the potential subjectivity of baseline/reference state definitions.	c, d	The Clause was substantially revised and moved away from requiring the assessment of recovery against a reference state. The revised approach focuses on adjusting forest operations to address the risks and threats identified under Clause 4 and to maintain ecological integrity features and socio-cultural values over time, providing a clearer basis for implementation and verification.
7	Concerns regarding long-term ecological assumptions and recovery feasibility	Several comments stress that ecological recovery in IFLs may take decades or centuries and may not be realistically achievable within certification cycles. Respondents question whether the Clause relies too heavily on uncertain assumptions regarding ecosystem recovery and resilience. Additional comments emphasize uncertainty regarding what level of temporary disturbance is considered acceptable before long-term degradation occurs.	a, b, c, d	This concern was addressed by substantially revising the Clause and moving away from provisions based on assumptions of long-term ecological recovery. The revised approach focuses instead on maintaining ecological integrity features and socio-cultural values over time.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
8	Need for stronger alignment with Motion 45 and the HCV framework	Multiple respondents argue that the Clause does not sufficiently align with Motion 45's stated intent to maintain intactness through strengthened HCV management. Concerns are raised that the Clause introduces a fundamentally different logic ("degrade and later recover") rather than maintaining HCV values continuously.	a, d, f	The recovery-based provisions were removed from this Clause. Neither the consulted nor the revised Advice Note intends to allow degradation under the premise of subsequent recovery. The revised Advice Note focuses instead on maintaining ecological integrity features and socio-cultural values over time. In addition, a separate Clause prohibits forest operations in areas where ecological integrity features or socio-cultural values cannot sustain disturbance, providing an additional safeguard for IFLs.
9	Need for proportionality and feasibility	Some respondents note that recovery monitoring and adaptive management requirements could become resource-intensive and technically demanding, especially in tropical contexts or for organizations with limited scientific capacity.	b, c, f	The recovery assessment provisions that generated concerns regarding long-term and resource-intensive monitoring were removed from this Clause. The revised approach focuses on adjusting forest operations to address identified risks and maintain ecological integrity features and socio-cultural values over time. Broader proportionality considerations are also reflected elsewhere in the revised Advice Note.
10	Need for stronger linkage to landscape-level requirements	Some respondents note that the Clause lacks sufficient integration with broader landscape-level requirements and cumulative impact considerations required under Motion 45.	a, d, f	The revised Advice Note strengthens the landscape-level approach by linking management measures to the risks and threats identified both within the Management Unit and within the Sphere of Influence. The revised Clause also explicitly requires forest operations to consider cumulative impacts and to maintain ecological integrity features and socio-cultural values over time. Measures related to risks within the Sphere of Influence are addressed separately through proportionate engagement requirements in Clause 9.
11	Concerns regarding applicability across ecological contexts	Some comments highlight that ecological dynamics and recovery trajectories differ significantly across forest types	b, d, f	The removal of the previous recovery-based provisions reduces reliance on generic assumptions about recovery

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
		and disturbance regimes, raising concerns regarding the applicability of generic recovery expectations across boreal, tropical, and other systems.		trajectories across different forest systems. The revised approach focuses instead on maintaining the ecological integrity features identified according to the specific ecological context and Best Available Information. Further contextual adaptation will also be considered through V2-0 (Phase 2).
12	General opposition to excessive complexity and Clause proliferation	A number of respondents reiterate broader concerns that the Advice Note introduces too many Clauses and excessive complexity, reducing operational feasibility and potentially undermining FSC uptake and certification attractiveness.	a, b, f	The Advice Note was substantially revised and streamlined in response to concerns regarding complexity. The revised structure more clearly separates the identification of ecological integrity features and socio-cultural values, risk assessment, management measures, Sphere of Influence engagement, and monitoring requirements, while reducing the overall number of Clauses.

Clause 6: Cumulative impacts on the critical landscape integrity features and socio-cultural value do not compromise the capacity for recovery

Q.28 Agreement with Clause 6: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 31 participants. Overall, 55% of respondents expressed agreement with the content, clarity, and intent of Clause 6 (agree and fully agree combined), while 26% expressed disagreement (disagree and fully disagree combined). An additional 19% of respondents selected the neutral option. The results indicate moderate support for Clause 6, although responses also reveal some concerns regarding the clarity, feasibility, and implementation implications of the proposed requirements. Compared to previous clauses, disagreement levels were lower than for Clause 5, while neutrality remained comparatively significant (Figure 42).

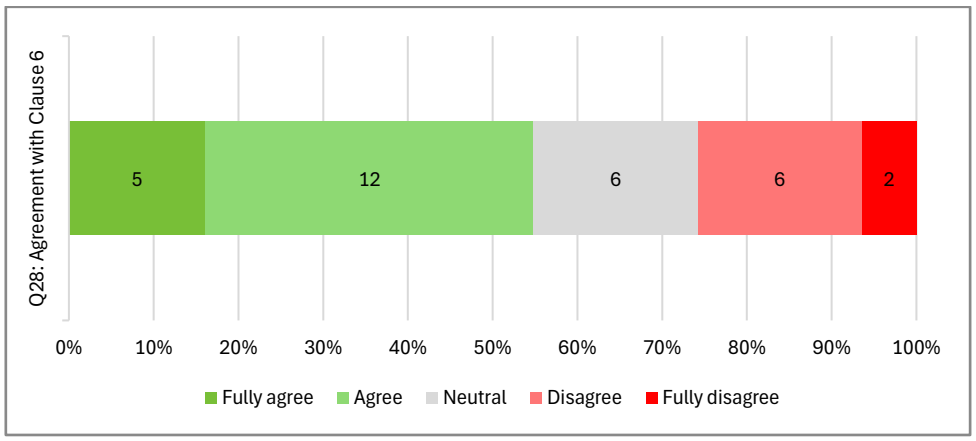

Figure 42 Agreement levels by all respondents for Clause 6

Across stakeholder types, FSC Members showed relatively mixed responses, although agreement levels exceeded disagreement overall. Certificate Holders and Certification Bodies/auditors expressed predominantly positive responses, including several “fully agree” responses. FSC Network Partner staff responses leaned toward disagreement, while responses from Consultants and Other stakeholder groups were distributed across agreement and neutral categories. FSC International staff members provided neutral responses only. The distribution of responses by stakeholder type is presented in Figure 43.

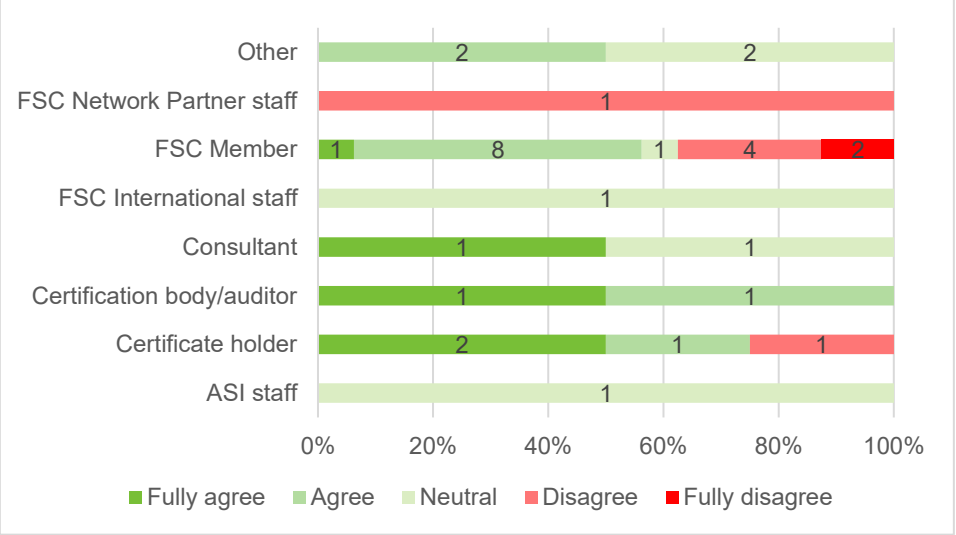

Figure 43 Agreement levels by stakeholder type for Clause 6: number of respondents

Differences across FSC membership chambers were also observed. Economic South, Social South, and Environmental South respondents expressed predominantly positive assessments of the Clause. Environmental North respondents showed comparatively higher levels of disagreement, while Economic North respondents presented mixed views across agreement and disagreement categories. Respondents identifying as non-members showed relatively high levels of neutrality, although positive responses remained slightly predominant overall. The distribution of responses by chamber is presented in Figure 44.

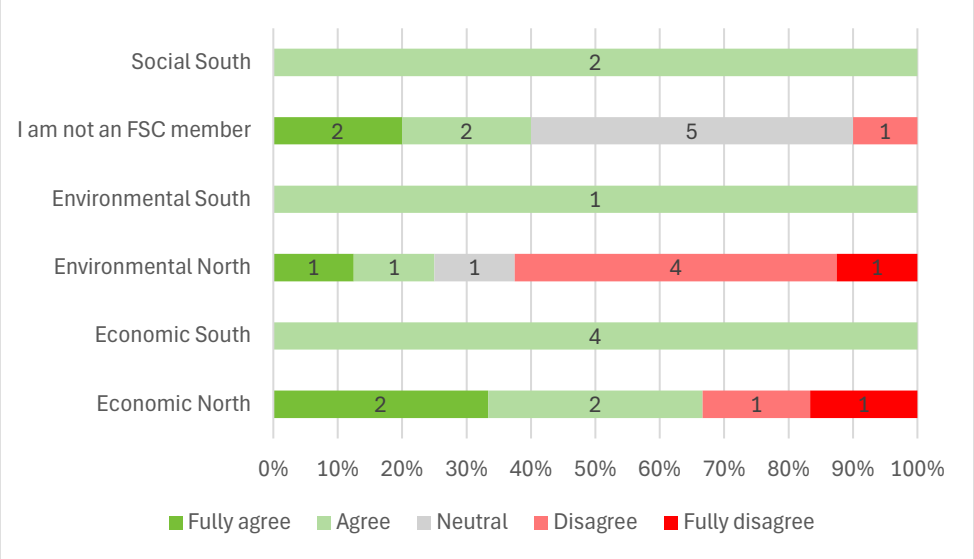

Figure 44 Agreement levels by FSC Membership Chambers for Clause 6: number of respondents

Q.29 Feasibility and auditability: To what extent is this Clause feasible to implement and auditable in practice, particularly regarding:

- distributing forest operations across space and time
- assessing cumulative impacts
- ensuring that impacts do not compromise the recovery capacity of features and values.

Please select on a scale of 1 to 5. (5 Fully feasible and auditable; 1 Not feasible or auditable)

A total of 29 participants responded to this question. Overall, 69% of respondents considered the proposed requirements to be at least moderately feasible and auditable in practice (moderately feasible/auditable, mostly feasible/auditable, and fully feasible/auditable combined). In contrast, 31% of respondents considered the requirements difficult or not feasible to implement and audit in practice (Figure 45).

These results suggest that a majority of respondents considered the Clause generally feasible and auditable overall, although a notable proportion of stakeholders continued to express concerns regarding implementation complexity, cumulative impact assessments, and the practical ability to evaluate recovery capacity consistently across different contexts.

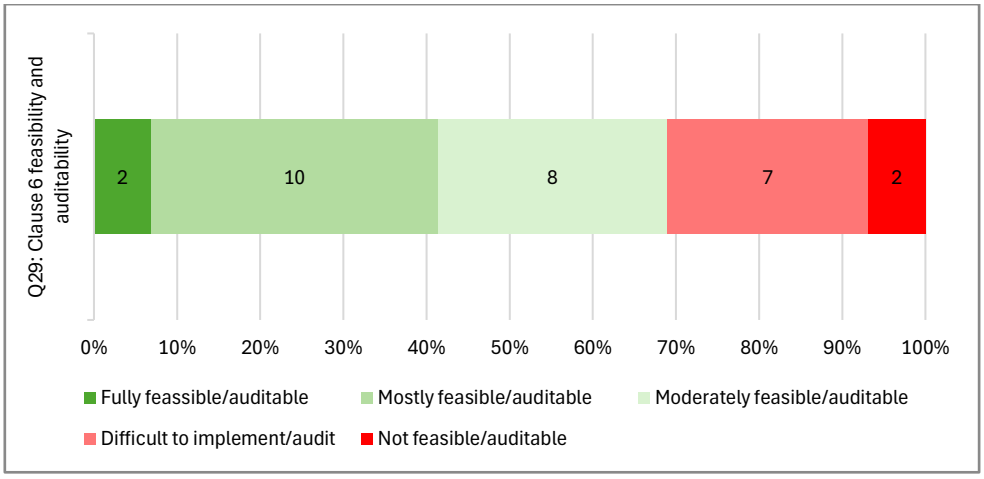

Figure 45 Feasibility and auditability levels by all respondents for Clause 6

Across stakeholder groups, FSC Members generally considered the proposed requirements moderately or mostly feasible and auditable, although several critical responses were also recorded. Certificate Holders and Certification Bodies/auditors expressed comparatively positive assessments overall, while FSC Network Partner staff, FSC International staff members, and ASI staff expressed comparatively more critical views. Responses from Consultants and Other stakeholder groups were mixed between moderate feasibility and implementation concerns. The distribution of responses by stakeholder type is presented in Figure 46.

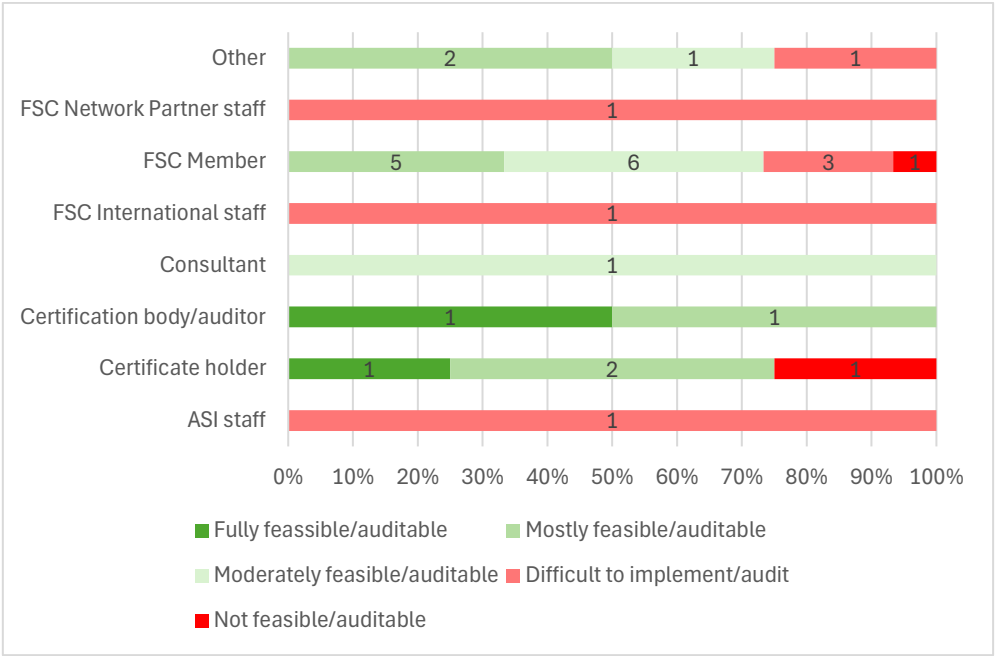

Figure 46 Feasibility and auditability levels by stakeholder type for Clause 6: number of respondents

Differences among FSC membership chambers were also observed. Economic South respondents expressed predominantly positive assessments regarding feasibility and auditability, while Environmental North respondents showed comparatively higher levels of concern, with responses concentrated in the “difficult to implement/audit” category. Economic North respondents presented mixed responses distributed across all categories, including “not feasible/auditable.” Respondents identifying as non-members also expressed relatively divided views between positive and critical assessments. The distribution of responses by chamber is presented in Figure 47.

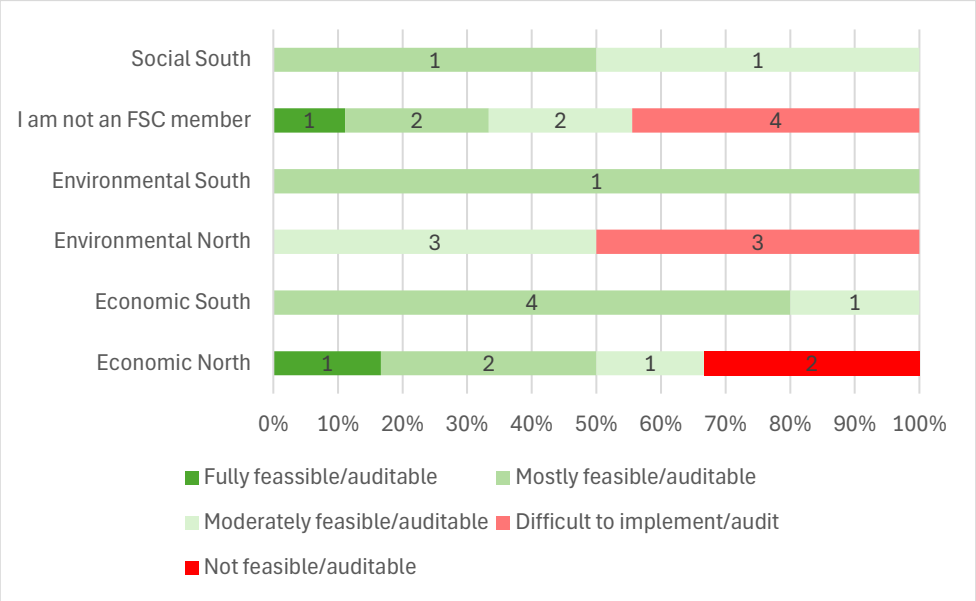

Figure 47 Feasibility and auditability levels by FSC Membership Chambers for Clause 6: number of respondents

Open feedback for Clause 6

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 6:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause remains overly conceptual, insufficiently operational, and not fully aligned with Motion 45 landscape-level expectations. Comments stressed that the Clause lacks sufficiently clear safeguards to maintain intactness and avoid progressive degradation caused by cumulative impacts over time.

b) Practical implementation constraints: challenges related to identifying, monitoring, and managing cumulative impacts across large spatial and temporal scales were identified. Concerns were raised regarding the technical burden of landscape-level monitoring, uncertainty regarding ecological recovery capacity, lack of operational methodologies, and the difficulty of addressing impacts generated by multiple actors across landscapes.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently verify cumulative degradation, operational contribution to impacts, and acceptable ecological thresholds over time in the absence of measurable thresholds and standardized methodologies.

d) Further clarification or definitions required: request of clearer definitions and methodologies for concepts such as “cumulative impacts,” “recovery capacity,” “critical landscape integrity features,” acceptable ecological thresholds, and long-term recovery expectations, as well as practical methodologies applicable across different forest types and management contexts.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified.

f) Elements to be revised or recommendations: key recommendations focused on strengthening operational management requirements, developing clearer cumulative impact methodologies and thresholds, improving auditability and ecological enforceability, strengthening alignment with Motion 45 landscape-level expectations, improving proportionality and feasibility, and maintaining intactness and long-term ecological integrity as explicit management objectives.

Table 7 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 7 Summary of key feedback from participants for Clause 6: Cumulative impacts on the critical landscape integrity features and socio-cultural value do not compromise the capacity for recovery

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for addressing cumulative impacts and operational planning over time and space	Several respondents support the intention of managing cumulative impacts through temporal and spatial distribution of operations. Positive comments recognize that the Clause aligns with good forest management planning practices and with broader landscape-level approaches promoted under Motion 45.	a, f	FSC appreciates the positive feedback on this Clause. The revised Advice Note maintains the consideration of cumulative impacts as part of the management of forest operations.
2	Need for stronger alignment with Motion 45 and landscape-level requirements	Multiple respondents stress that the Clause does not sufficiently operationalize the landscape-level dimension required by Motion 45. Some comments argue that cumulative impacts cannot be effectively assessed without broader landscape coordination and consideration of activities conducted by multiple actors.	a, d, f	The Clause has been substantially revised to clarify its operational focus. The revised Advice Note addresses cumulative impacts through the management and adjustment of forest operations, while broader engagement regarding risks and threats within the Sphere of Influence is addressed separately through Clause 9. The development of more context-specific and regionalized requirements will be addressed in Phase 2 and incorporated into V2-0 of the Advice Note.
3	Clause considered too vague, subjective, or difficult to operationalize	Several respondents indicate that the Clause remains highly conceptual and lacks sufficiently clear operational expectations. Concerns are raised that concepts such as “cumulative impacts,” “recovery capacity,” and “compromise of integrity features” remain too subjective and difficult to translate into practical management decisions.	a, b, c, d	The Clause has been substantially revised to address these concerns. The revised approach provides clearer direction on adjusting forest operations to maintain ecological integrity features and socio-cultural values over time and to avoid cumulative impacts that could compromise their maintenance. More context-specific approaches will be further developed during Phase 2 (V2-0).
4	Need for clearer definitions and methodologies for cumulative impacts	A major recurring concern is the absence of robust methodologies and operational guidance for identifying, measuring, and assessing cumulative impacts over time and space. Respondents repeatedly request clearer	d, f	The Clause has been revised to provide clearer operational direction regarding the consideration of cumulative impacts in forest operations. More context-specific methodologies and approaches will be considered

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
		definitions, measurable thresholds, and practical methodologies applicable across different contexts.		as part of the regionalization of requirements to be developed during Phase 2 (V2-0). Also, see point 3 above.
5	Auditability and verification concerns	Respondents repeatedly question how certification bodies will consistently verify cumulative impacts, recovery capacity, and the contribution of specific operations to broader landscape degradation. Concerns are raised regarding subjectivity, absence of measurable thresholds, and lack of standardized methodologies.	c, d	The Clause has been substantially revised to provide clearer operational expectations. The revised approach moves away from assessing “recovery capacity” and instead focuses on whether forest operations are adjusted to maintain ecological integrity features and socio-cultural values over time and avoid cumulative impacts that could compromise their maintenance. This provides a clearer basis for implementation and verification.
6	Need for stronger operational management requirements	Several respondents argue that the Clause lacks sufficiently concrete operational requirements and mitigation measures. Particular emphasis is placed on the need for explicit Reduced Impact Logging (RIL), road density controls, harvesting intensity reduction, retention thresholds, and measurable operational planning requirements to minimize cumulative impacts.	a, b, f	The revised Clause provides clearer direction on the adjustment of forest operations to address cumulative impacts. More specific operational approaches, including Reduced Impact Logging (RIL) and other context-appropriate measures, may be further considered through the development of landscape- and region-specific requirements during Phase 2 (V2-0).
7	Need to maintain intactness and avoid progressive degradation	Several comments stress that cumulative impacts should be assessed in relation to maintaining intactness over time and avoiding gradual degradation of IFLs. Respondents warn that small or individually acceptable impacts may accumulate into significant long-term degradation if not properly bounded.	a, c, d, f	The term “intactness” is not explicitly used within the concept of Ecological Integrity Features. This reflects the view that maintaining ecological integrity provides a clearer and more operational objective for organizations managing IFL areas. However, the concept of intactness remains embedded across the identified ecological integrity features. Importantly, the revised Clause explicitly addresses cumulative impacts by requiring forest operations to be managed so that these features and socio-cultural values are maintained over time.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
8	Concerns regarding long-term ecological assumptions and recovery capacity	Respondents note that assumptions regarding ecosystem recovery capacity remain uncertain and may vary significantly across forest types and disturbance regimes. Concerns are raised that long-term cumulative effects may exceed ecological resilience thresholds that are difficult to predict or measure.	a, b, c, d	The revised Clause moves away from relying on assumptions about ecological recovery capacity. Instead, it focuses on maintaining ecological integrity features and socio-cultural values over time and on adjusting forest operations to avoid cumulative impacts that could compromise their maintenance. This reduces reliance on uncertain long-term recovery assumptions.
9	Need for proportionality and feasibility	Several comments emphasize that implementation and monitoring requirements related to cumulative impacts may become highly resource-intensive and technically demanding, particularly where large-scale landscape monitoring and long-term datasets are required.	b, c, f	The Clause has been substantially revised and simplified, reducing reliance on complex assessments of long-term recovery capacity. The revised approach focuses on the management of forest operations and cumulative impacts, while more context-specific and proportionate approaches will be further considered through the regionalization of requirements during Phase 2 (V2-0).
10	Concerns regarding influence outside the Management Unit	Some respondents highlight that cumulative impacts often result from multiple actors operating across landscapes, raising concerns regarding how far certificate holders can reasonably be held responsible for impacts outside their direct operational control.	b, c, e	The revised Advice Note more clearly distinguishes between the Organization's management responsibilities and its influence beyond the Management Unit. Management of forest operations and their cumulative impacts is addressed through the relevant management Clauses, while risks and threats within the Sphere of Influence are addressed separately through engagement measures under Clause 9. These engagement measures are required to be proportionate to the scale of the Organization.
11	Concerns regarding applicability across ecological contexts	Several comments note that cumulative impact dynamics and ecological resilience differ significantly across boreal, tropical, and other forest systems, requiring greater contextual flexibility and regionally adapted methodologies.	b, d, f	The need for contextual flexibility across different ecological and regional contexts is recognized. More context-specific and regionalized requirements will be developed during Phase 2 and incorporated into V2-0 of the Advice Note.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
12	General opposition to excessive complexity and Clause proliferation	A number of respondents reiterate broader concerns that the Advice Note introduces excessive complexity, overly process-oriented requirements, and too many Clauses, potentially reducing feasibility and certification attractiveness.	a, b, f	The Advice Note was substantially revised and streamlined in response to concerns regarding complexity and implementation feasibility. The revised Advice Note contains 12 Clauses, compared with 18 Clauses in the draft submitted for public consultation. In addition, implementation is phased, with the first four Clauses becoming effective on 1 July 2026 and the remaining provisions being addressed through the subsequent phase.

Clause 7: Identification and delineation of IFL areas

Q.33 Agreement with Clause 7: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 34 participants. Overall, 62% of respondents expressed agreement with the content, clarity, and intent of Clause 7 (agree and fully agree combined), while 24% expressed disagreement (disagree and fully disagree combined). An additional 15% of respondents selected the neutral option (Figure 48).

The results indicate comparatively strong support for Clause 7 among respondents. Agreement levels were substantially higher than disagreement levels, suggesting that a majority of stakeholders considered the overall direction and intent of the Clause to be appropriate, although some concerns regarding implementation and interpretation remained.

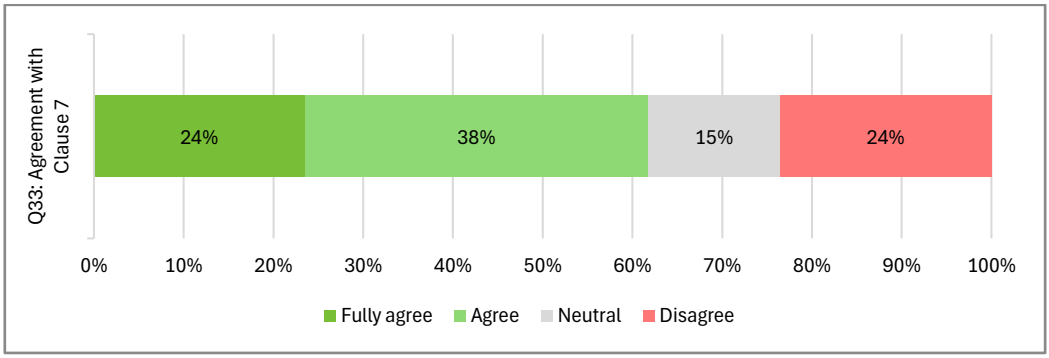

Figure 48 Agreement levels by all respondents for Clause 7

Across stakeholder types, FSC Members expressed predominantly positive responses, including several "fully agree" responses. Certification Bodies/auditors also expressed only positive responses. Certificate Holders presented more mixed views distributed across agreement, neutrality, and disagreement categories, while Consultants and Other stakeholder groups also showed mixed responses. FSC Network Partner staff and ASI staff responses were neutral overall. The distribution of responses by stakeholder type is presented in Figure 49.

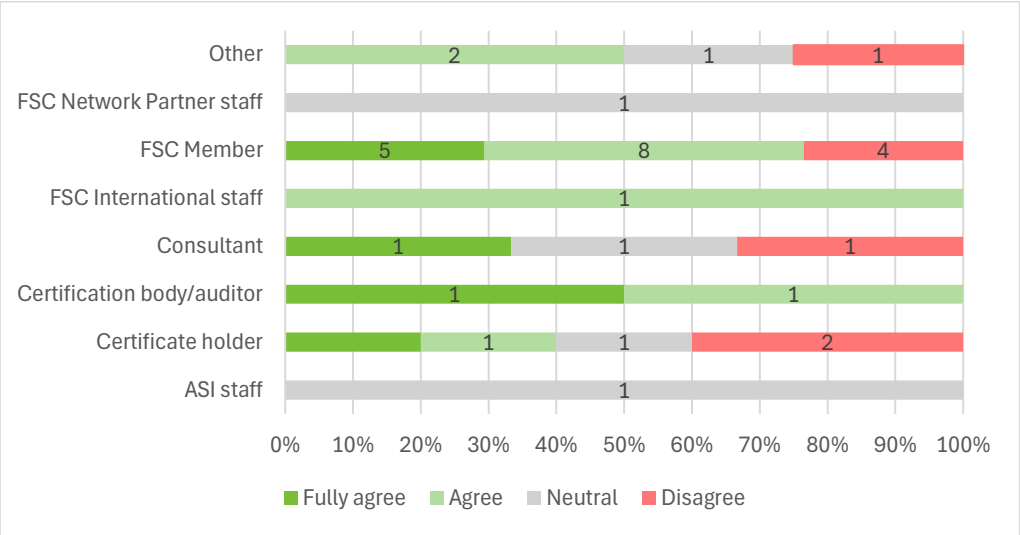

Figure 49 Agreement levels by stakeholder type for Clause 7: number of respondents

Differences across FSC membership chambers were also observed. Environmental North respondents showed comparatively strong levels of agreement, including several "fully agree" responses, while

Economic South and Social South respondents also expressed predominantly positive assessments. Economic North respondents showed more mixed views, with disagreement levels exceeding agreement levels. Respondents identifying as non-members expressed relatively balanced responses distributed across neutrality and agreement categories. The distribution of responses by chamber is presented in Figure 50.

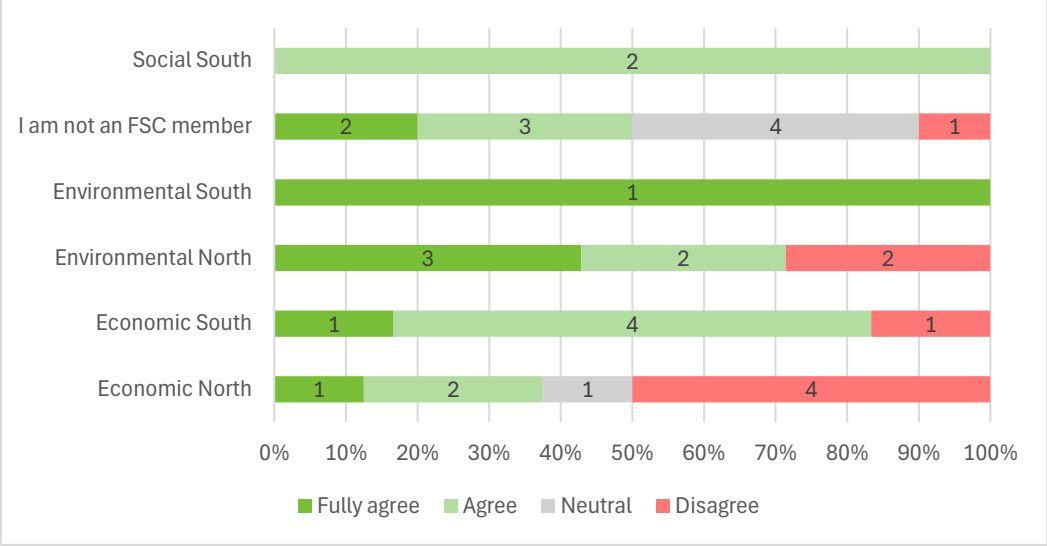

Figure 50 Agreement levels by FSC Membership Chambers for Clause 7: number of respondents

Q.34 Clarity and applicability of the trigger condition: How clear and practically applicable is the condition that such areas are identified based on Best Available Information, concluding that no disturbance can be sustained?

Please select on a scale of 1 to 5. (5 Very clear and applicable; 1 Very unclear or not applicable in practice)

This question assessed stakeholder perceptions regarding the clarity and practical applicability of the condition that such areas are identified based on Best Available Information, concluding that no disturbance can be sustained.

A total of 28 participants responded to this question. Overall, 71% of respondents considered the trigger condition to be at least moderately clear and applicable in practice (moderately clear/applicable, clear/mostly applicable, and very clear/applicable combined). In contrast, 29% of respondents considered the condition unclear or difficult to apply in practice (Figure 51).

These results suggest that a majority of respondents considered the proposed trigger condition generally understandable and operationally applicable. Nevertheless, a notable proportion of respondents continued to identify concerns regarding interpretation, implementation consistency, and practical application.

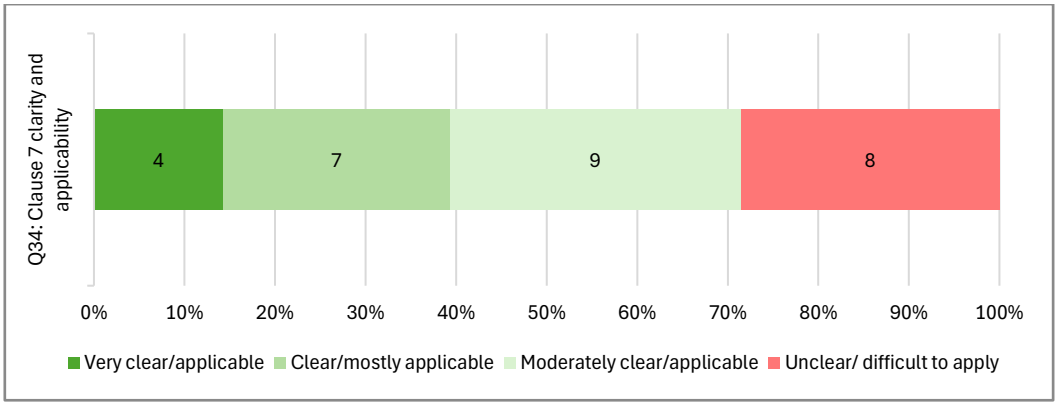

Figure 51 Clarity levels by all respondents for Clause 7

Across stakeholder groups, FSC Members showed comparatively mixed views, with responses distributed across both positive and "unclear/difficult to apply" categories. Certificate Holders and Certification Bodies/auditors generally expressed more positive assessments overall, while FSC International staff members and ASI staff expressed comparatively more critical views. Responses from Consultants and Other stakeholder groups generally leaned toward moderate or positive assessments. The distribution of responses by stakeholder type is presented in Figure 52.

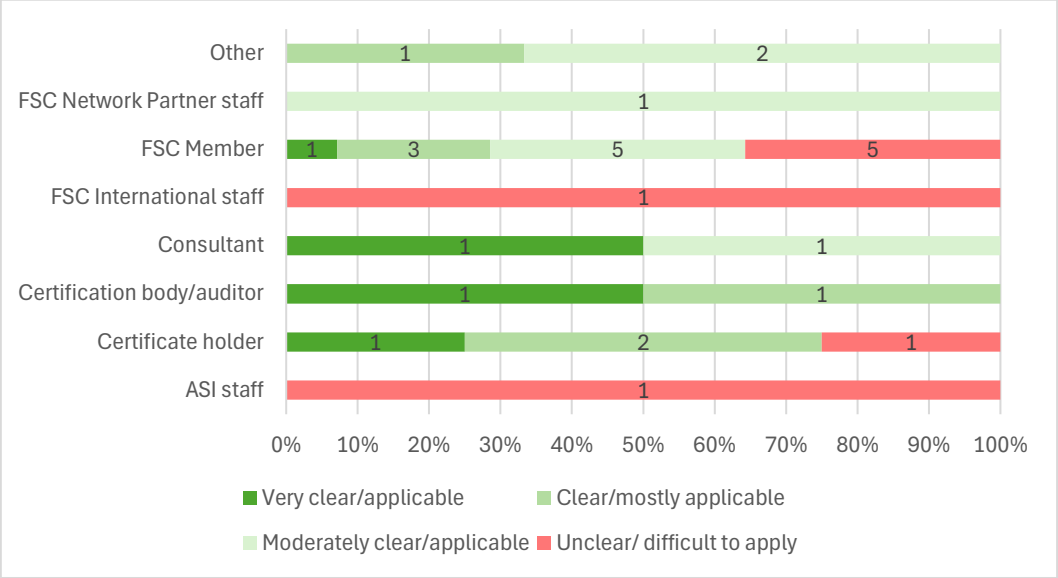

Figure 52 Clarity levels by stakeholder type for Clause 7: number of respondents

Differences among FSC membership chambers were also observed. Economic South and Environmental South respondents expressed predominantly positive assessments regarding the clarity and applicability of the trigger condition. Environmental North and Economic North respondents showed comparatively more mixed or critical views, particularly within the "unclear/difficult to apply" category. Respondents identifying as non-members also presented relatively mixed responses distributed across positive, neutral, and difficult-to-apply categories. The distribution of responses by chamber is presented in Figure 53.

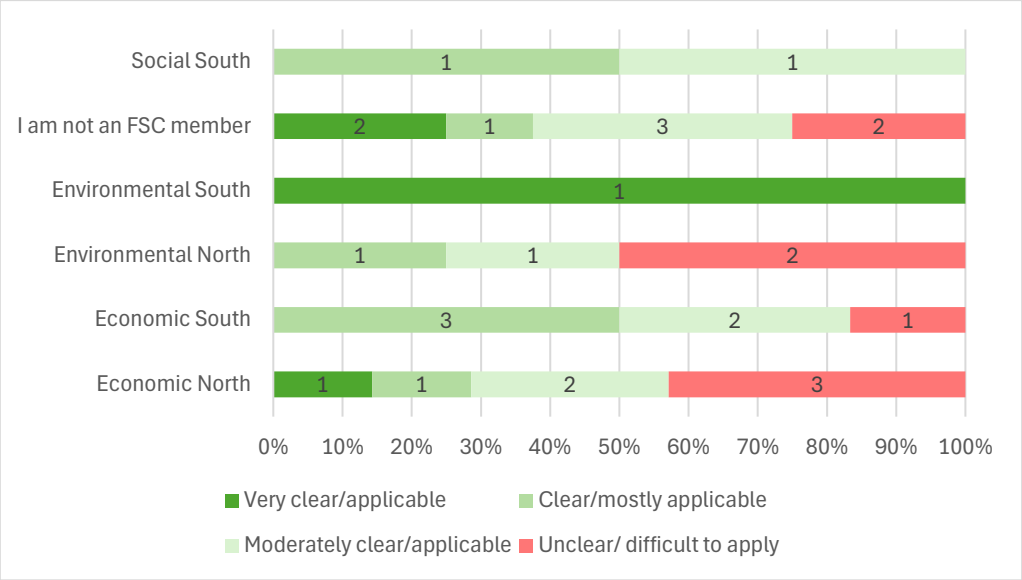

Figure 53 Clarity levels by FSC Membership Chambers for Clause 7: number of respondents

Open feedback for Clause 7

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 7:

a) Reasons for disagreement with the intent and/or scope: The Clause relies on highly subjective concepts without sufficiently clear operational thresholds or ecological criteria. Several comments also stressed that intactness and prevention of irreversible degradation should remain more explicitly central and more clearly aligned with Motion 45 and FSC's HCV framework.

b) Practical implementation constraints: stakeholders identified challenges related to determining ecological sensitivity, identifying areas unable to sustain disturbance, and applying restrictions consistently across different forest systems and disturbance regimes. Concerns were also raised regarding proportionality, implementation costs, technical burden, and operational feasibility across different contexts.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently assess irreversible degradation risks, ecological recovery potential, and compliance across different ecological contexts in the absence of measurable thresholds and standardized methodologies for determining when areas "cannot sustain disturbance."

d) Further clarification or definitions required: request for clearer definitions and methodologies for concepts such as "disturbance," "industrial activities," "irreversible degradation," ecological thresholds, recovery potential, and criteria for identifying highly sensitive areas, as well as clearer operational guidance regarding acceptable versus unacceptable impacts.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified.

f) Elements to be revised or recommendations: key recommendations focused on establishing clearer ecological thresholds and operational criteria, clarifying definitions related to disturbance and industrial activities, strengthening operational management measures and restrictions, improving auditability and methodological consistency, ensuring contextual flexibility across forest systems, and maintaining intactness and prevention of irreversible degradation as explicit objectives.

Table 8 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 8 Summary of key feedback from participants for Clause 7: No industrial activity in forest areas where the critical landscape integrity features and socio-cultural values cannot sustain disturbances

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for restricting activities in highly sensitive areas	Several respondents support the principle that areas unable to sustain disturbance should receive stricter protection measures and operational restrictions. Positive comments recognize the relevance of preventing irreversible degradation of critical ecological features and maintaining ecological integrity in highly sensitive IFL areas.	a, f	FSC appreciates the support for the intent of this Clause.
2	Need for clearer operational criteria, definitions and management guidance	Respondents request clearer criteria and methodologies for determining when ecological integrity features and socio-cultural values cannot sustain disturbance, together with clearer definitions of relevant concepts and guidance on the operational restrictions or management measures that should apply.	b, d, f	The revised Clause provides a clear safeguard by requiring forest operations not to be conducted where ecological integrity features or socio-cultural values cannot sustain disturbance. Further region-specific operational approaches will be considered during Phase 2 (V2-0). Relevant terminology should also be interpreted in conjunction with the existing FSC normative framework.
3	Auditability and consistency of implementation	Respondents question how certification bodies can consistently verify whether areas or values cannot sustain disturbance, particularly in the absence of standardized methodologies, measurable ecological thresholds and clear evidence expectations.	a, b, c, d	The revised Clause has been simplified and focuses directly on whether identified ecological integrity features and socio-cultural values can sustain disturbance. Further region-specific approaches developed during Phase 2 (V2-0) are expected to support more consistent implementation and verification.
4	Need to maintain ecological integrity and prevent irreversible degradation	Respondents stress that the Clause should provide a strong safeguard against irreversible degradation and remain clearly aligned with Motion 45 and FSC's HCV approach, including the objective of maintaining IFL ecological integrity over time.	a, d, f	Maintaining ecological integrity is a core objective of the revised Advice Note. The revised Clause provides an explicit safeguard by requiring that forest operations not be conducted where ecological integrity features or socio-cultural values cannot sustain disturbance. This complements the management provisions under Clause 5 aimed at maintaining these features and values over time.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
5	Need for proportionality and applicability across ecological contexts	Respondents emphasize that ecological sensitivity and disturbance tolerance vary considerably across forest types and regions, including tropical, boreal and naturally disturbance-driven ecosystems. Implementation therefore needs to allow sufficient contextual flexibility and remain proportionate and feasible.	b, d, f	The need for contextual and regional adaptation is recognized. The regional lens and development of more context-specific approaches will be a focus of Phase 2 and incorporated into V2-0 of the Advice Note.
6	Long-term ecological uncertainty and recovery potential	Respondents question how ecological resilience and the capacity to withstand or recover from disturbance can be assessed, particularly where ecological responses occur over very long timeframes or vary according to natural disturbance regimes.	a, b, d, f	FSC recognizes the relevance of this concern. The revised Clause focuses on whether ecological integrity features and socio-cultural values can sustain disturbance rather than relying on subsequent recovery as a management premise. Further context-specific approaches to support this assessment will be considered during Phase 2 (V2-0).
7	Need for stronger linkage to landscape-level considerations	Some respondents stress that the capacity to sustain disturbance should be considered in relation to broader factors such as connectivity and cumulative impacts, rather than being assessed only at the individual operational level.	a, d, f	The revised Advice Note addresses these considerations across interconnected Clauses. Clause 5 specifically addresses the management of forest operations, including cumulative impacts and connectivity, while broader risks and threats within the Sphere of Influence are addressed through separate engagement provisions.
8	General concerns regarding complexity and interpretive burden	Respondents raise broader concerns that highly interpretive requirements may increase implementation complexity and lead to inconsistent interpretation between certificate holders and certification bodies.	a, c, f	The Advice Note was substantially revised and streamlined to reduce complexity and facilitate implementation. The draft submitted for consultation contained 18 Clauses, while the revised Advice Note contains 12. Phase 2 (V2-0) will further develop context-specific approaches to support clearer and more consistent implementation.

Clause 8: Logging/post-logging measures to prevent unauthorized access and facilitate natural regeneration

Q.38 Agreement with Clause 8: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 32 participants. Overall, 75% of respondents expressed agreement with the content, clarity, and intent of Clause 8 (agree and fully agree combined), while 16% expressed disagreement (disagree and fully disagree combined). An additional 9% of respondents selected the neutral option. The results indicate comparatively strong support for Clause 8 among respondents. Agreement levels were significantly higher than disagreement levels, suggesting that most stakeholders considered the overall direction and intent of the Clause appropriate and generally understandable (Figure 54).

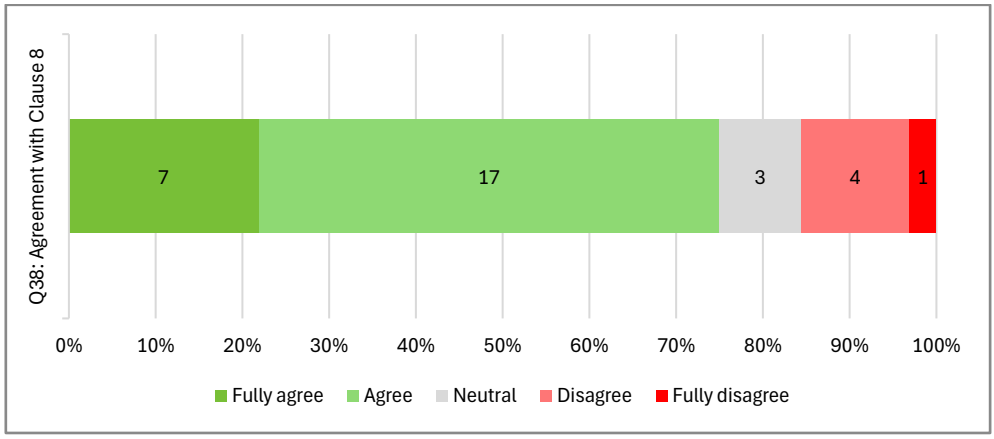

Figure 54 Agreement levels by all respondents for Clause 8

Across stakeholder types, FSC Members expressed predominantly positive responses, including several "fully agree" responses. Certification Bodies/auditors and Other stakeholder groups also expressed mainly positive assessments. Certificate Holders and Consultants showed more mixed views distributed across agreement, neutrality, and disagreement categories, while ASI staff responses were neutral overall. FSC Network Partner staff responses were divided between disagreement and agreement. The distribution of responses by stakeholder type is presented in Figure 55.

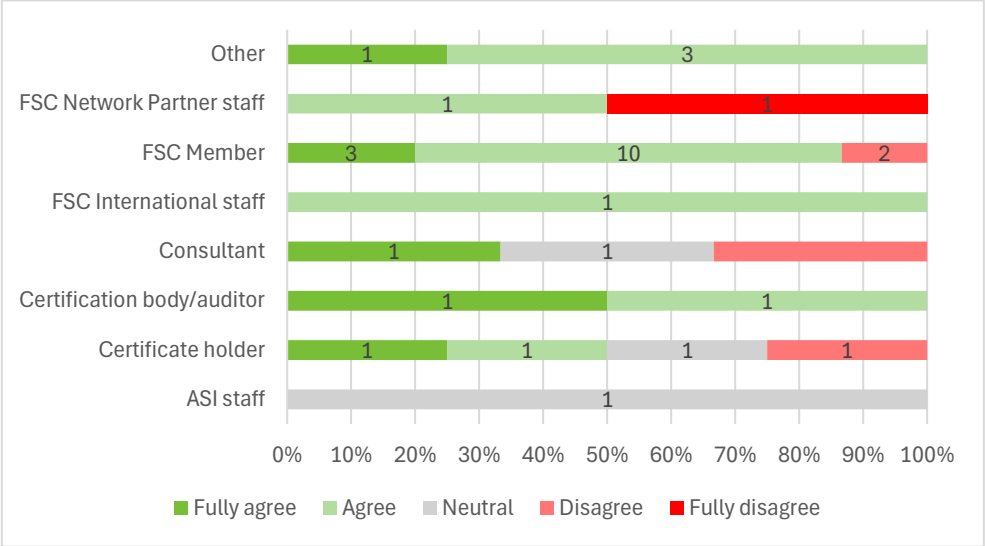

Figure 55 Agreement levels by stakeholder type for Clause 8: number of respondents

Differences across FSC membership chambers were also observed. Environmental North, Economic South, Social South, and Environmental South respondents expressed predominantly positive assessments of the Clause. Economic North respondents showed comparatively more mixed responses, with disagreement levels slightly exceeding agreement levels. Respondents identifying as non-members generally expressed positive views overall, including several "fully agree" responses. The distribution of responses by chamber is presented in Figure 56.

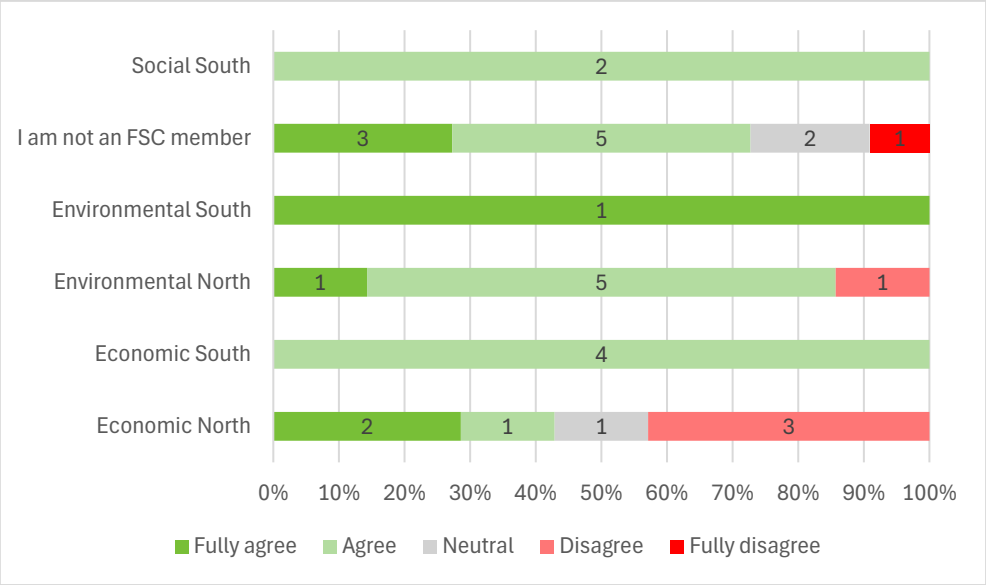

Figure 56 Agreement levels by FSC Membership Chambers for Clause 8: number of respondents

Q.39 Feasibility and auditability: To what extent is this Clause feasible to implement and auditable in practice, particularly regarding:

- implementing measures to prevent unauthorized access
- applying these measures as part of the operational sequence
- supporting natural regeneration

Please select on a scale of 1 to 5. Please select on a scale of 1 to 5. (5 Fully feasible and auditable; 1 Not feasible or auditable)

A total of 25 participants responded to this question. Overall, 88% of respondents considered the proposed requirements to be at least moderately feasible and auditable in practice (moderately feasible/auditable, mostly feasible/auditable, and fully feasible/auditable combined). In contrast, 12% of respondents considered the requirements difficult or not feasible to implement and audit in practice (Figure 57).

These results indicate comparatively strong confidence among respondents regarding the practical feasibility and auditability of Clause 8. Compared to previous clauses, this question received one of the highest levels of positive assessment regarding implementation and verification practicality.

Across stakeholder groups, FSC Members expressed predominantly positive views, particularly within the "mostly feasible/auditable" category. Certification Bodies/auditors, Consultants, FSC International staff members, FSC Network Partner staff, and Other stakeholder groups also expressed mainly positive assessments. Certificate Holders showed more mixed responses distributed across all categories except "not feasible/auditable." The distribution of responses by stakeholder type is presented in Figure 58.

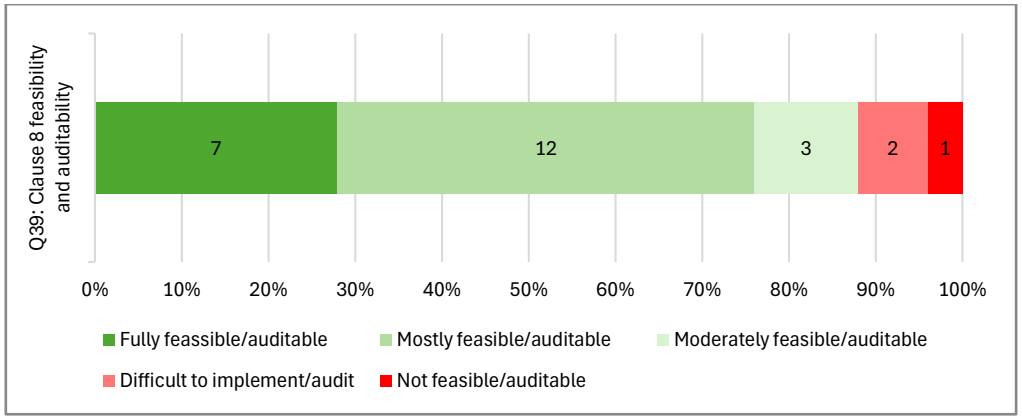

Figure 57 Feasibility and auditability levels by all respondents for Clause 8.

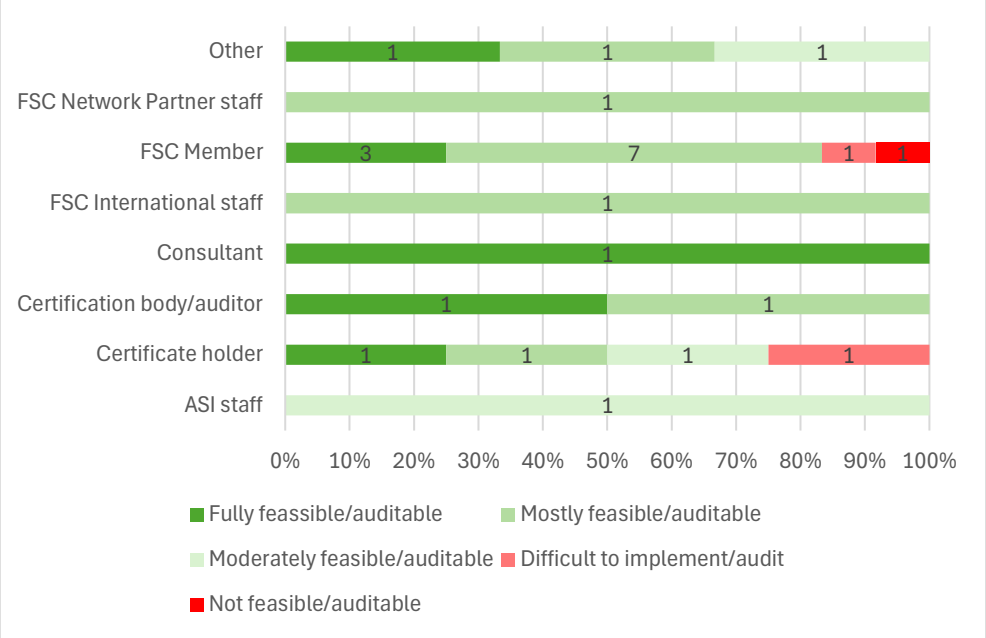

Figure 58 Feasibility and auditability levels by stakeholder type for Clause 8: number of respondents

Differences among FSC membership chambers were also observed. Economic South, Social South, Environmental South, and non-member respondents expressed predominantly positive assessments regarding feasibility and auditability. Economic North respondents showed comparatively more mixed responses distributed across all categories, including “not feasible/auditable.” Environmental North respondents also expressed generally positive views overall, although some responses indicated implementation difficulties. The distribution of responses by chamber is presented in Figure 59.

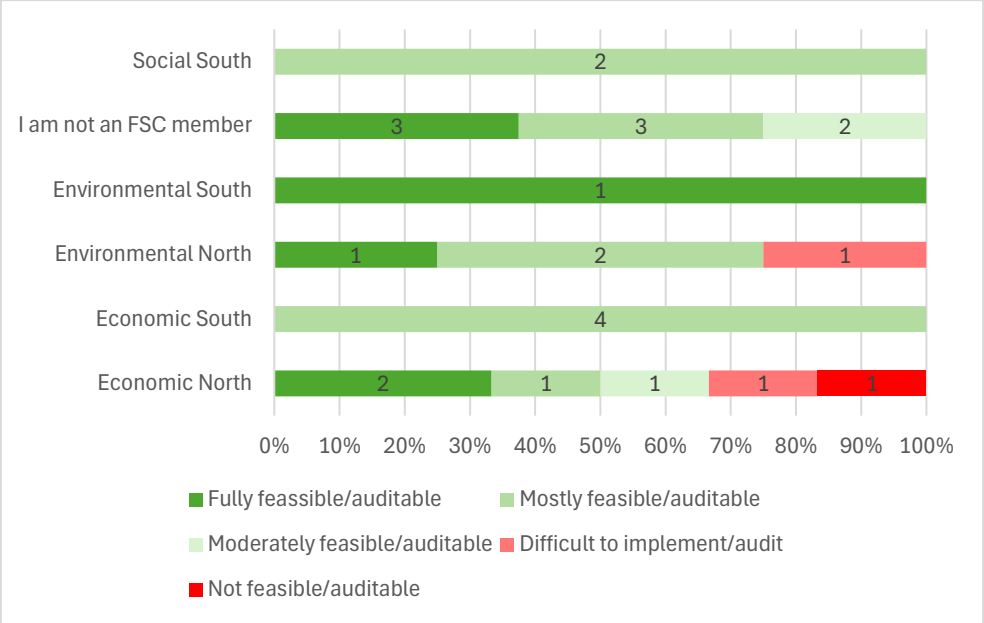

Figure 59 Feasibility and auditability levels by FSC Membership Chambers for Clause 8: number of respondents

Open feedback for Clause 8

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 8:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause remains relatively broad and insufficiently operationalized, relying on general process-oriented expectations without sufficiently measurable implementation criteria or operational clarity.

b) Practical implementation constraints: stakeholders identified challenges related to preventing unauthorized access in large or remote forest landscapes, operationalizing preventive measures consistently, and ensuring proportionality relative to organizational capacity and actual risk levels.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently assess the effectiveness of unauthorized access prevention measures and their integration into operational planning in the absence of measurable expectations and standardized criteria.

d) Further clarification or definitions required: multiple comments requested clearer definitions and guidance regarding “unauthorized access,” “preventive measures,” “natural regeneration support,” and the expected linkage between operational measures and ecological recovery objectives.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised governance concerns regarding the realistic ability of organizations to control third-party access and activities outside their direct authority.

f) Elements to be revised or recommendations: key recommendations focused on clarifying operational expectations and preventive measures, improving proportionality and feasibility, strengthening links between preventive measures and ecological recovery objectives, improving auditability and implementation consistency, and reducing ambiguity and excessive process-oriented wording.

Table 9 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 9 Summary of key feedback from participants for Clause 8: Logging/post-logging measures to prevent unauthorized access and facilitate natural regeneration

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for preventive operational measures and natural regeneration approaches	Several respondents support the implementation of preventive operational measures to avoid unauthorized access and support natural regeneration processes. Positive comments recognize the relevance of integrating these measures into operational planning and post-harvest management.	a, f	FSC appreciates the support and positive feedback on the intent of this Clause. While the consulted Clause was removed as a standalone provision, the element related to regeneration was retained and further developed in Clause 6 of the revised Advice Note.
2	Need for clearer operational guidance and implementation expectations	A recurring concern is that the Clause does not sufficiently explain what concrete preventive measures are expected, how they should be implemented operationally, or what constitutes adequate protection against unauthorized access. Respondents request clearer practical guidance and examples.	d, f	The consulted Clause was removed from the revised Advice Note. Consequently, the specific provisions related to preventing unauthorized access no longer apply. The regeneration-related element was retained and further developed in revised Clause 6, which addresses natural and assisted natural regeneration, as well as artificial regeneration where justified.
3	Clause considered somewhat broad or insufficiently operationalized	Some respondents indicate that the Clause remains relatively generic and process-oriented, lacking sufficiently clear operational thresholds, evidence expectations, or measurable implementation criteria.	a, b, c, d	The consulted Clause was removed as a standalone provision during the revision and the requirements related to unauthorized access were not retained. The regeneration-related element was incorporated and further developed in Clause 6 of the revised Advice Note.
4	Auditability and verification concerns	Respondents question how certification bodies will consistently verify whether unauthorized access prevention measures are effective, operationally integrated, and proportionate to the risks present. Concerns are raised regarding the absence of measurable Clauses or minimum expectations.	c, d	The consulted Clause was removed from the revised Advice Note, including the specific provisions related to preventing unauthorized access. Therefore, the auditability concerns associated with verifying these measures are no longer applicable to this Clause. Regeneration is addressed separately under revised Clause 6.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
5	Need for proportionality and feasibility	Several comments stress that implementation expectations should remain proportionate to organizational capacity, operational realities, landscape context, and the actual level of risk associated with unauthorized access.	b, d, f	The consulted Clause and its provisions concerning unauthorized access were removed from the revised Advice Note, addressing the specific implementation and proportionality concerns associated with these measures. Regeneration requirements are addressed separately under revised Clause 6.
6	Need for clearer linkage between preventive measures and ecological recovery objectives	Some respondents indicate that the Clause does not sufficiently explain how unauthorized access prevention measures contribute to ecological recovery, integrity maintenance, or broader IFL management objectives.	b, d, f	The consulted Clause was removed and the provisions concerning unauthorized access were not retained in the revised Advice Note. The regeneration-related element is now addressed separately under Clause 6 and linked to maintaining ecological integrity features and socio-cultural values.
7	Concerns regarding implementation in remote or large-scale forest landscapes	Several comments note that preventing unauthorized access may be operationally difficult in large, remote, or highly accessible forest landscapes where organizations have limited control over third-party activities.	b, c, e	The provisions requiring measures to prevent unauthorized access were removed from the revised Advice Note. Therefore, the specific implementation concerns related to controlling unauthorized access in large or remote landscapes no longer apply under this Clause.
8	Need for stronger linkage with broader landscape and governance realities	Some respondents highlight that unauthorized access often depends on broader governance, enforcement, and regional infrastructure dynamics that extend beyond the direct control of certificate holders.	b, e, f	The provisions concerning unauthorized access were removed from the revised Advice Note. Broader risks and threats beyond the Management Unit are addressed separately through the Sphere of Influence provisions, including engagement measures under revised Clause 9.
9	Need for clearer definitions and terminology	Several comments request clarification of concepts such as “unauthorized access,” “preventive measures,” and “natural	d, f	The consulted Clause was removed and the terminology specifically related to unauthorized access and associated preventive measures is no

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
		regeneration support" to improve consistency of implementation and auditing.		longer used in this context. The regeneration-related provisions are now addressed separately under revised Clause 6.
10	General concerns regarding excessive process-oriented wording	Some respondents reiterate broader concerns that the Advice Note relies heavily on process-based wording and interpretive requirements rather than concise operational expectations.	a, c, f	The consulted Clause was removed as part of the broader revision and simplification of the Advice Note. The relevant regeneration provisions were consolidated under revised Clause 6, reducing duplication and process-oriented requirements.
11	Concerns regarding long-term ecological assumptions and recovery potential	Several respondents question how long-term ecological resilience and recovery potential should be assessed, particularly in ecosystems where recovery may take decades or centuries or where disturbance regimes are naturally dynamic.	a, b, c, d	FSC recognizes that this is a complex issue. The Technical Working Group (TWG) will further consider this topic during Phase 2, as part of the development of V2-0 of the Advice Note.
12	General concerns regarding excessive complexity and interpretive burden	Several respondents reiterate broader concerns that the Advice Note introduces overly complex and highly interpretive requirements that may increase inconsistency between certificate holders and certification bodies and reduce implementation feasibility.	a, c, f	The Advice Note has been substantially revised to simplify its structure and reduce complexity. Phase 2 (V2-0 of the Advice Note) will further develop context-specific approaches to support greater clarity and consistency in the implementation of the Clauses across different regions.
13	Need for stronger alignment with Motion 45 and HCV logic	Several comments indicate that the Clause should more explicitly align with Motion 45 objectives and FSC's HCV framework by strengthening safeguards for intactness and ensuring that restrictions are linked to maintaining HCV values over time.	a, d, f	Maintaining ecological integrity features and socio-cultural values is a core objective of the revised Advice Note, as reflected particularly in the management provisions under Clause 5. These provisions aim to ensure that forest operations maintain the identified features and values over time.

Clause 9: Recovery of socio-cultural values from disturbances, similar to their reference state

Q.43 Agreement with Clause 9: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 31 participants. Overall, 58% of respondents expressed agreement with the content, clarity, and intent of Clause 9 (agree and fully agree combined), while 26% expressed disagreement (disagree and fully disagree combined). An additional 16% of respondents selected the neutral option (Figure 60). The results indicate moderate support for Clause 9, although responses also reveal notable concerns regarding the operationalization and implementation of socio-cultural recovery approaches. While agreement levels exceeded disagreement overall, the relatively high proportion of neutral and disagreement responses suggests continued uncertainty among some stakeholders regarding the practical application of the proposed requirements.

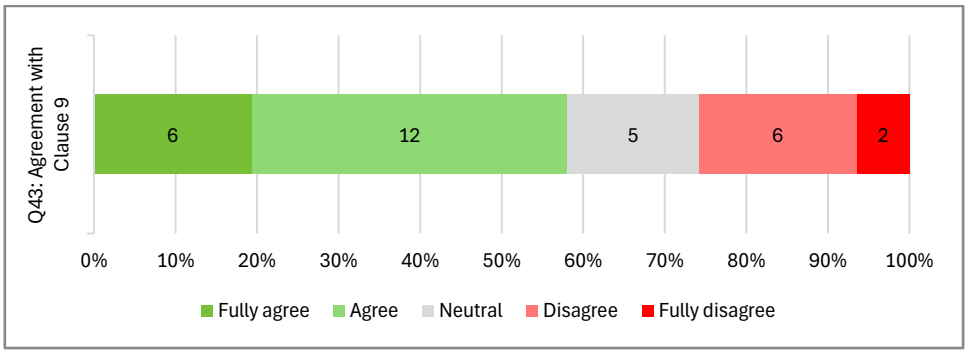

Figure 60 Agreement levels by all respondents for Clause 9

Across stakeholder types, FSC Members expressed relatively mixed views, although agreement responses remained predominant overall. Certification Bodies/auditors, Certificate Holders, and Other stakeholder groups expressed mainly positive assessments, while Consultants showed more divided responses across agreement, neutrality, and disagreement categories. FSC Network Partner staff and ASI staff responses were neutral overall. The distribution of responses by stakeholder type is presented in Figure 61.

Differences across FSC membership chambers were also observed. Economic South, Social South, and Environmental South respondents expressed predominantly positive assessments of the Clause. Environmental North respondents showed comparatively higher levels of disagreement, while Economic North respondents also presented relatively mixed views. Respondents identifying as non-members generally expressed positive assessments overall, although several neutral responses were also recorded. The distribution of responses by chamber is presented in Figure 62.

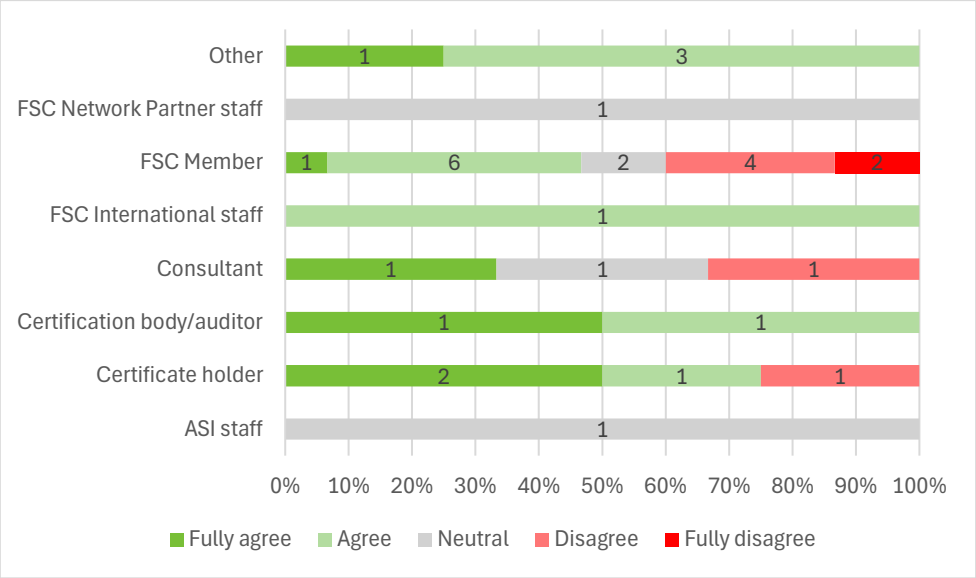

Figure 61 Agreement levels by stakeholder type for Clause 9: number of respondents

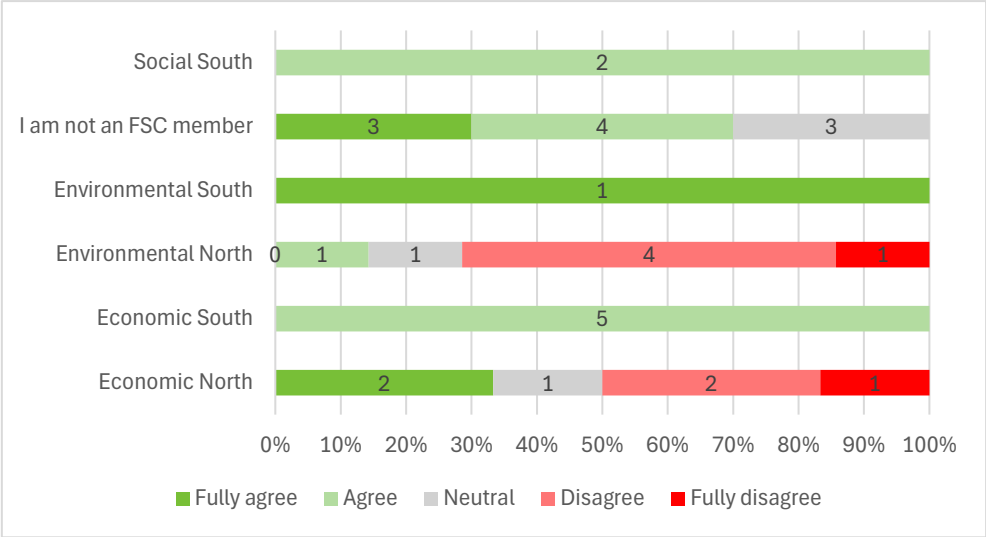

Figure 62 Agreement levels by FSC Membership Chambers for Clause 9: number of respondents

Q.44 Feasibility and auditability: To what extent is this Clause feasible to implement and auditable in practice, particularly regarding:

- adapting forest operations to support recovery of socio-cultural values
- assessing recovery of socio-cultural values
- comparing recovery to a reference state

Please select on a scale of 1 to 5. (5 Fully feasible and auditable; 1 Not feasible or auditable)

A total of 27 participants responded to this question. Overall, 70% of respondents considered the proposed requirements to be at least moderately feasible and auditable in practice (moderately feasible/auditable, mostly feasible/auditable, and fully feasible/auditable combined). In contrast, 30% of respondents considered the requirements difficult or not feasible to implement and audit in practice (Figure 63).

These results suggest that a majority of respondents considered the Clause generally feasible and auditable overall, although a substantial proportion of stakeholders continued to express concerns regarding the practical assessment and verification of socio-cultural recovery outcomes and culturally appropriate implementation processes.

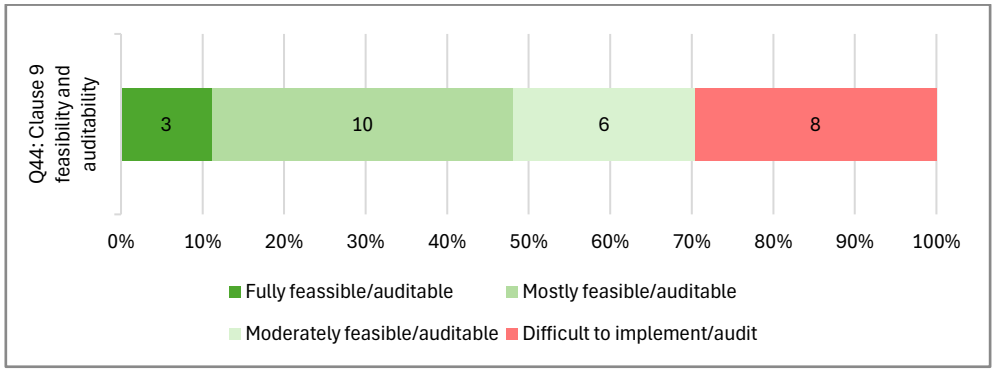

Figure 63 Feasibility and auditability levels by all respondents for Clause 9.

Across stakeholder groups, FSC Members generally considered the requirements moderately or mostly feasible and auditable, although several critical responses were also recorded. Certification Bodies/auditors and Certificate Holders expressed comparatively positive assessments overall, while Consultants, FSC International staff members, and Other stakeholder groups showed more mixed or critical views regarding implementation feasibility. The distribution of responses by stakeholder type is presented in Figure 64.

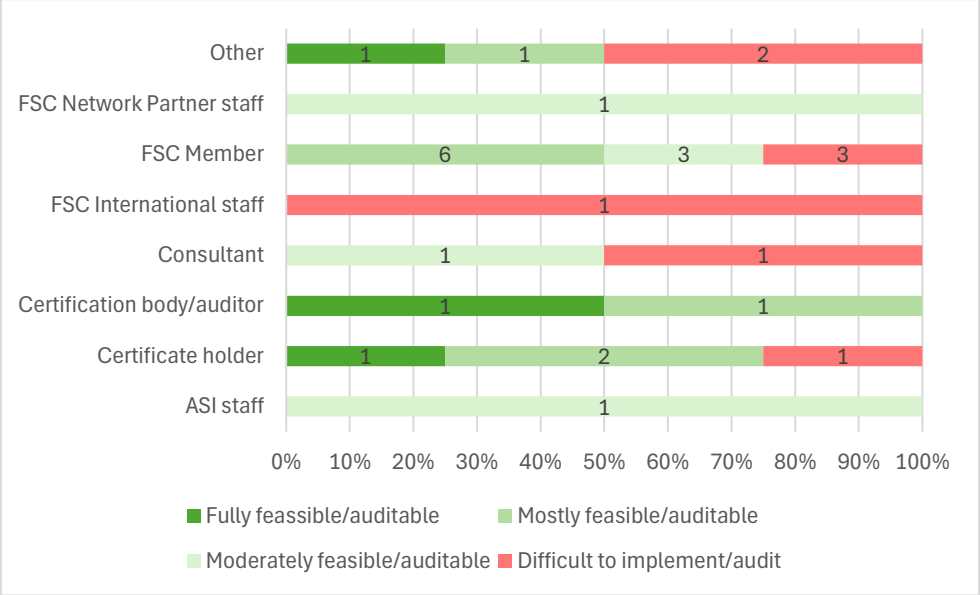

Figure 64 Feasibility and auditability levels by stakeholder type for Clause 9: number of respondents

Differences among FSC membership chambers were also observed. Economic South, Social South, and Environmental South respondents expressed predominantly positive assessments regarding feasibility and auditability. Economic North respondents showed comparatively higher levels of concern, particularly within the “difficult to implement/audit” category. Respondents identifying as non-members also presented relatively mixed views distributed across both positive and difficult-to-implement categories. The distribution of responses by chamber is presented in Figure 65.

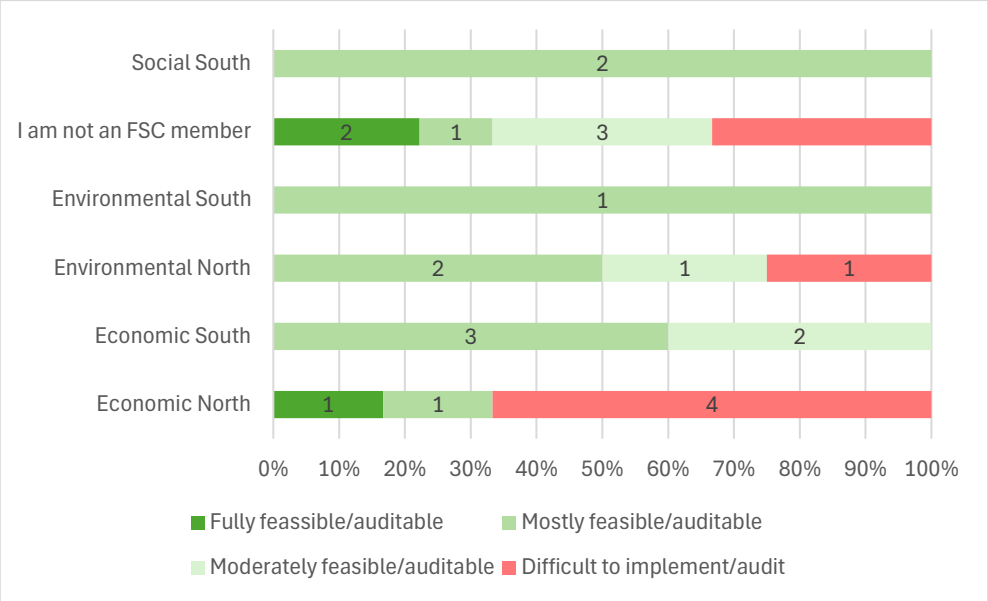

Figure 65 Feasibility and auditability levels by FSC Membership Chambers for Clause 9: number of respondents

Open feedback for Clause 9

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 9:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause relies on concepts that remain too broad, subjective, and difficult to operationalize consistently, particularly regarding the notion of "recovery" of socio-cultural values. Several comments also questioned whether cultural values can or should be treated through frameworks analogous to ecological recovery approaches.

b) Practical implementation constraints: stakeholders identified challenges related to assessing and monitoring socio-cultural values, conducting culturally appropriate engagement, and demonstrating links between management interventions and socio-cultural outcomes. Concerns were also raised regarding proportionality, technical burden, and contextual variability across regions and communities.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently verify qualitative social outcomes, assess recovery of socio-cultural values, and ensure consistency across contexts in the absence of clear methodologies and measurable expectations.

d) Further clarification or definitions required: multiple comments requested clearer operational definitions and guidance for concepts such as "socio-cultural values," "Indigenous cultural landscapes," "recovery," baseline conditions, and culturally appropriate methodologies, as well as clearer expectations regarding evidence and monitoring approaches.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised concerns regarding differing national and cultural interpretations of socio-cultural values and Indigenous rights frameworks.

f) Elements to be revised or recommendations: key recommendations focused on clarifying concepts and methodologies for socio-cultural recovery, strengthening culturally appropriate engagement requirements, improving auditability and evidence expectations, ensuring greater contextual flexibility, clarifying links between management actions and socio-cultural outcomes, and reducing excessive complexity and process-oriented wording.

Table 10 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 10 Summary of key feedback from participants for Clause 9: Recovery of socio-cultural values from disturbances, similar to their reference state

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for integrating socio-cultural values into recovery approaches	Several respondents support the inclusion of socio-cultural values within IFL recovery and adaptive management approaches. Positive comments recognize the importance of considering Indigenous cultural landscapes, cultural values, and community relationships with forests alongside ecological recovery objectives.	a, f	FSC appreciates the positive feedback on the inclusion of socio-cultural values. The revised Advice Note includes now the provisions in Clause 7 and continues to integrate socio-cultural values alongside ecological integrity features throughout the identification, management and monitoring provisions.
2	Need for clearer definitions and operationalization of socio-cultural values	A major concern is that concepts such as “socio-cultural values,” “Indigenous cultural landscapes,” and “recovery of socio-cultural values” remain insufficiently defined and difficult to operationalize consistently across contexts. Respondents request clearer guidance, methodologies, and practical examples.	d, f	The concept of “socio-cultural values” has been revised for greater clarity and includes examples of categories of such values. “Indigenous Cultural Landscapes” is not a new concept in the FSC normative framework and is already included in the International Generic Indicators (FSC-STD-60-004). FSC has started the development of further guidance to support implementation in relation to socio-cultural values and Indigenous Cultural Landscapes.
3	Clause considered too vague, subjective, or difficult to operationalize	Several comments indicate that the Clause remains highly conceptual and relies on broad qualitative concepts without sufficiently measurable or auditable expectations. Concerns are raised regarding how organizations are expected to assess, demonstrate, and monitor “recovery” of socio-cultural values in practice.	a, b, c, d	The consulted Clause was removed as a standalone Clause, and the relevant provisions were revised and integrated into **Clause 7** of the revised Advice Note. In particular, the revised approach moves away from requiring organizations to demonstrate the “recovery” of socio-cultural values as framed in the consulted draft. FSC has started the development of further guidance on socio-cultural values to support implementation.
4	Auditability and verification concerns	Respondents repeatedly question how certification bodies will consistently verify recovery of socio-cultural values, especially where outcomes depend on subjective interpretation, qualitative information, or long-term social processes. Concerns are raised regarding evidence	c, d	The consulted Clause was removed as a standalone Clause and the approach to socio-cultural values was revised, including moving away from the previous recovery-based framing. Verification of the relevant requirements will rely on established certification

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
		expectations, monitoring methodologies, and consistency across CBs.		processes, auditor competence and culturally appropriate engagement. FSC has started the development of further guidance on socio-cultural values to support consistent implementation and verification.
5	Need for culturally appropriate and participatory approaches	Several respondents stress that implementation must rely on culturally appropriate engagement processes and meaningful participation of Indigenous Peoples and traditional communities. Some comments highlight that socio-cultural values cannot be assessed solely through technical or externally defined methodologies.	b, d, f	This feedback has been considered in the revised Advice Note. Clause 3 now explicitly requires culturally appropriate engagement with affected Indigenous Peoples and/or traditional peoples for the identification and delineation of Indigenous Cultural Landscapes and associated socio-cultural values.
6	Concerns regarding the concept of “recovery” for socio-cultural values	Multiple respondents question whether socio-cultural values can realistically be assessed or “recovered” using approaches similar to ecological recovery frameworks. Some comments suggest that cultural values may evolve over time and cannot always be measured against fixed baseline conditions.	a, d, f	This concern has been addressed through the revision of the Advice Note. The standalone Clause focused on the recovery of socio-cultural values was removed, and the revised approach no longer treats socio-cultural values through the same recovery-based framing as proposed in the consulted draft. The revised Advice Note instead addresses socio-cultural values through identification, management and monitoring provisions, supported by culturally appropriate engagement.
7	Need for proportionality and feasibility	Several comments note that monitoring and assessing socio-cultural recovery may become highly resource-intensive and technically difficult, especially if expectations remain broad or insufficiently defined.	b, c, f	FSC acknowledges this concern and aims to maintain an appropriate balance between the robustness of the requirements and their feasibility and cost of implementation. The removal of the standalone recovery-based Clause and the restructuring of the relevant provisions help reduce the implementation burden associated with assessing socio-cultural recovery. FSC has started the development of further guidance on socio-cultural values to facilitate implementation.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
8	Need for clearer linkage between management actions and socio-cultural outcomes	Respondents request clearer explanation of how management interventions are expected to contribute to recovery of socio-cultural values and how organizations should demonstrate causality between management actions and observed outcomes.	b, c, d	The relevant provisions have been restructured across the revised Advice Note, linking the identification of socio-cultural values with subsequent management and monitoring requirements. FSC has started the development of further guidance on socio-cultural values which can provide support on how these provisions should be operationalized in practice.
9	Concerns regarding applicability across different contexts	Several comments emphasize that socio-cultural values differ significantly across Indigenous Peoples, local communities, regions, and forest contexts, requiring greater contextual flexibility and avoidance of overly standardized approaches.	b, d, f	FSC recognizes that socio-cultural values and Indigenous Cultural Landscapes are highly context-dependent. The revised Advice Note therefore relies on culturally appropriate engagement to support context-specific implementation. The Technical Working Group (TWG) will also consider regional and contextual differences as part of Phase 2 and the development of V2-0 of the Advice Note.

Clause 10: Identification and delineation of IFL areas

Q.48 Agreement with Clause 10: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 29 participants. Overall, 62% of respondents expressed agreement with the content, clarity, and intent of Clause 10 (agree and fully agree combined), while 21% expressed disagreement (disagree and fully disagree combined). An additional 17% of respondents selected the neutral option (Figure 66).

The results indicate generally positive support for Clause 10, although responses also reveal some concerns regarding operational clarity, implementation implications, and consistency with existing FSC processes. While agreement levels exceeded disagreement overall, the proportion of neutral and disagreement responses suggests that some stakeholders remain uncertain regarding the practical application of the proposed requirements.

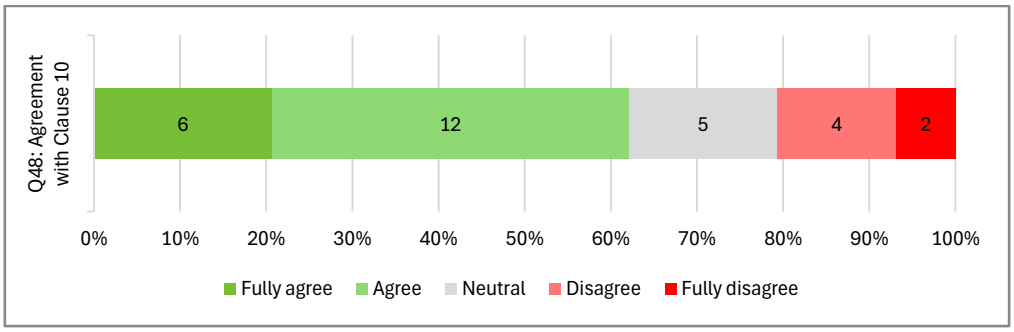

Figure 66 Agreement levels by all respondents for Clause 10

Across stakeholder types, FSC Members expressed predominantly positive responses overall, including several “fully agree” responses, although disagreement responses were also recorded. Certification Bodies/auditors and Certificate Holders generally expressed positive assessments, while Consultants and Other stakeholder groups showed more mixed views distributed across agreement and neutrality categories. FSC Network Partner staff expressed disagreement, while ASI staff responses were neutral overall. The distribution of responses by stakeholder type is presented in Figure 67.

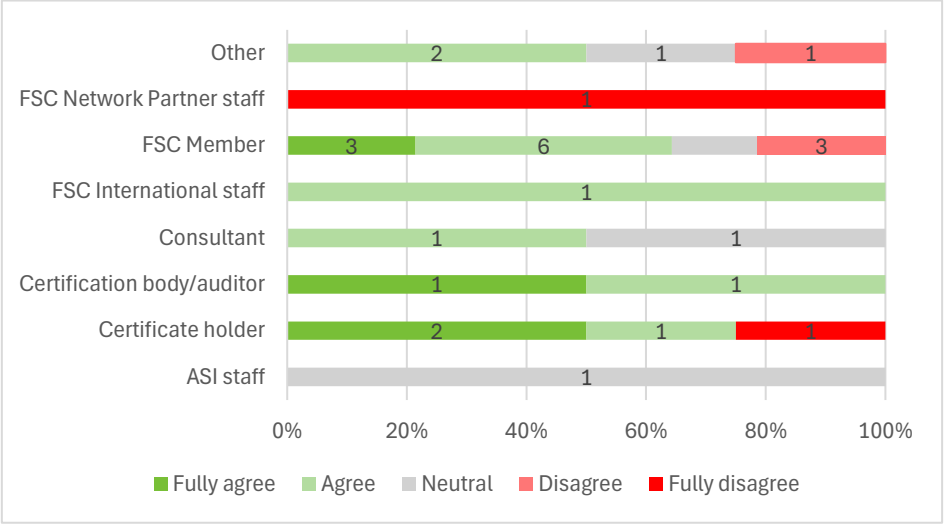

Figure 67 Agreement levels by stakeholder type for Clause 10: number of respondents

Differences across FSC membership chambers were also observed. Economic South, Social South, Environmental South, and Environmental North respondents expressed predominantly positive assessments of the Clause. Economic North respondents showed relatively mixed responses distributed across agreement and disagreement categories. Respondents identifying as non-members also presented mixed views, with responses spread across neutrality, agreement, and disagreement categories. The distribution of responses by chamber is presented in Figure 68.

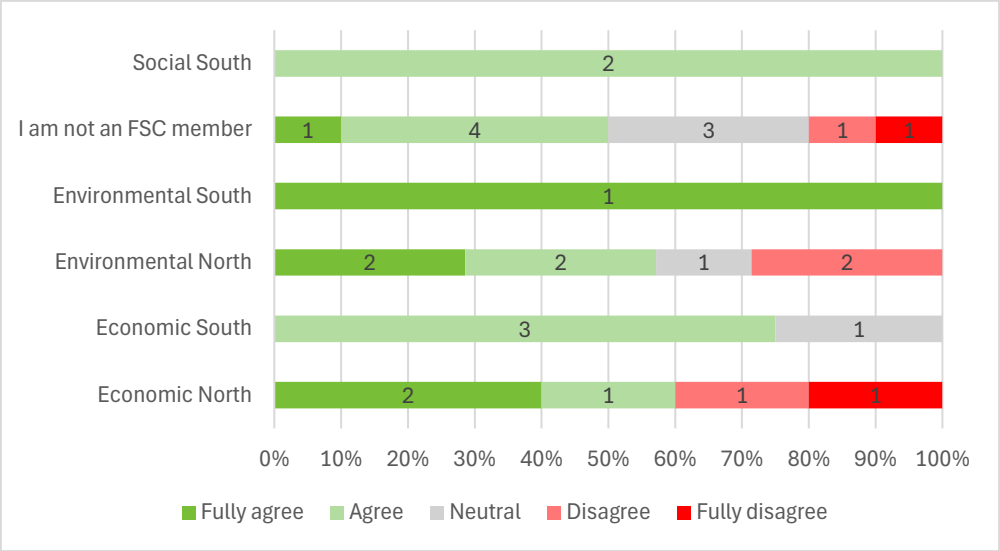

Figure 68 Agreement levels by FSC Membership Chambers for Clause 10: number of respondents

Q.49 Feasibility and operational implications: To what extent is this requirement feasible to implement in practice, particularly regarding:

- immediately ceasing management activities when new values are identified
- suspending operations until protection measures are agreed
- applying the requirement in alignment with local or national laws

Please select on a scale of 1 to 5. (5 Very clear and applicable; 1 Very unclear or not applicable in practice)

A total of 27 participants responded to this question. Overall, 67% of respondents considered the proposed requirements to be at least moderately clear and applicable in practice (moderately clear/applicable, clear/mostly applicable, and very clear/applicable combined). In contrast, 33% of respondents considered the requirements unclear, difficult to apply, or not applicable in practice (Figure 69).

These results suggest that a majority of respondents considered the proposed requirement generally feasible and operationally applicable. Nevertheless, a substantial proportion of stakeholders expressed concerns regarding implementation practicality, operational disruption, and alignment with existing legal and operational frameworks.

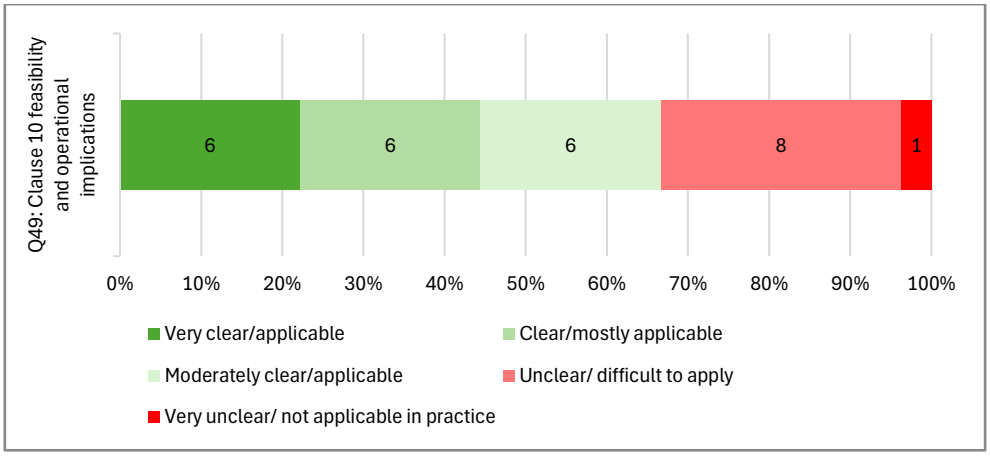

Figure 69 Clarity levels by all respondents for Clause 10.

Across stakeholder groups, FSC Members expressed relatively mixed views, with responses distributed across both positive and difficult-to-apply categories. Certification Bodies/auditors and Certificate Holders expressed predominantly positive assessments overall, while Consultants, FSC International staff members, FSC Network Partner staff, and Other stakeholder groups expressed more moderate or critical views regarding practical applicability. The distribution of responses by stakeholder type is presented in Figure 70.

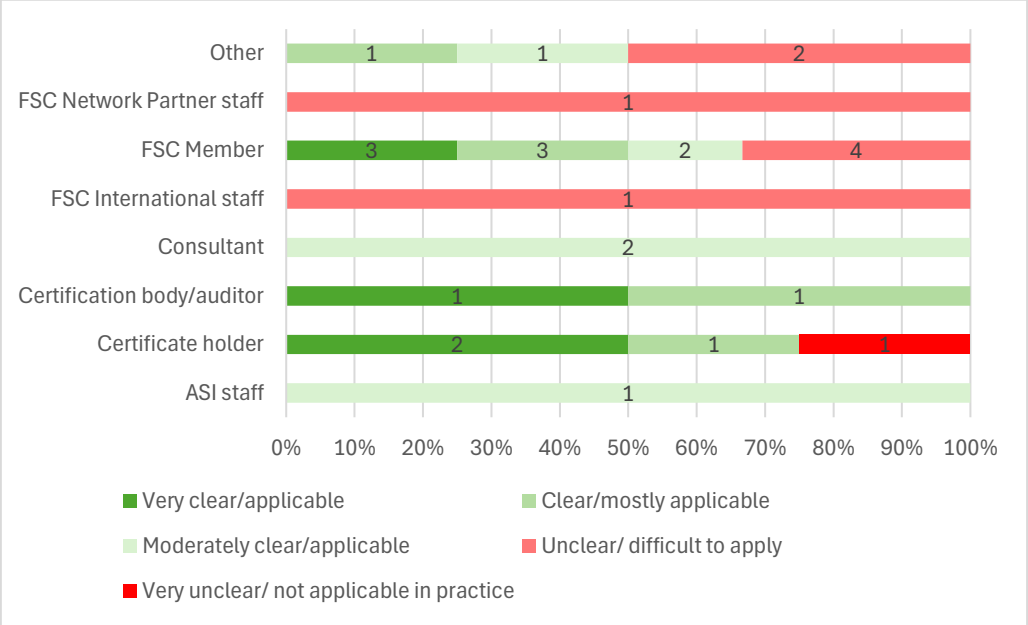

Figure 70 Clarity levels by stakeholder type for Clause 10: number of respondents

Differences among FSC membership chambers were also observed. Economic South, Social South, and Environmental South respondents expressed predominantly positive assessments regarding feasibility and operational applicability. Economic North respondents showed relatively mixed responses across positive and difficult-to-apply categories, while non-member respondents showed comparatively higher levels of uncertainty and implementation concerns. The distribution of responses by chamber is presented in Figure 71.

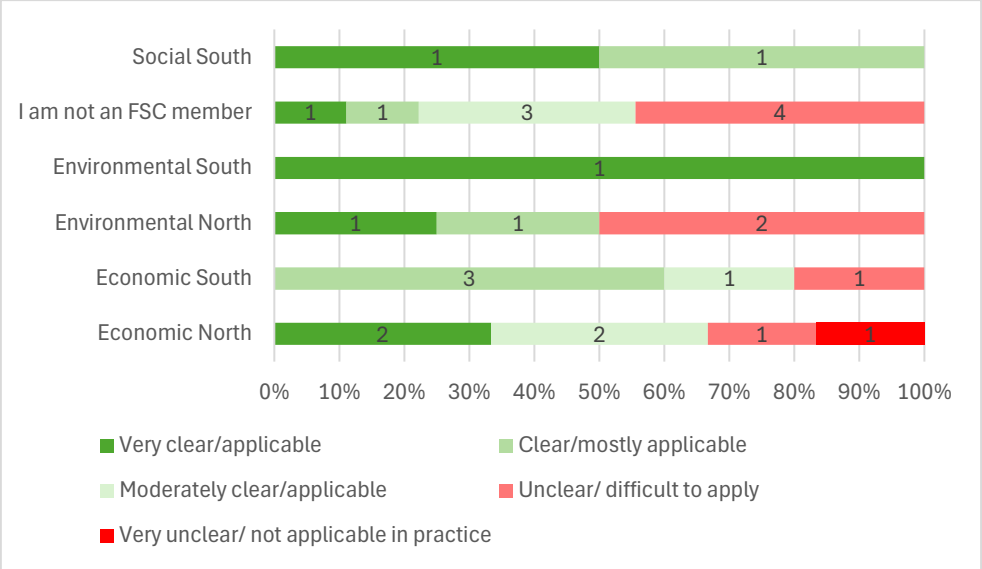

Figure 71 Clarity levels by FSC Membership Chambers for Clause 10: number of respondents

Open feedback for Clause 10

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 10:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause relies on broad and insufficiently defined concepts that may create uncertainty, inconsistent implementation, and excessive operational disruption. Several comments also questioned alignment with existing FSC provisions and precautionary approaches already present within the system.

b) Practical implementation constraints: stakeholders identified challenges related to suspending operations in practice, identifying and assessing newly discovered values, conducting culturally appropriate engagement, and balancing precautionary protection with operational feasibility and contractual realities.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently assess identification of new values, adequacy of protection measures, justification for operational suspension, and conditions for resuming activities in the absence of standardized methodologies and clearly defined expectations.

d) Further clarification or definitions required: multiple comments requested clearer definitions and operational guidance for concepts such as “newly identified values,” “Indigenous cultural landscapes,” “socio-cultural values,” “protection measures,” operational suspension procedures, and decision-making responsibilities, as well as clearer procedural sequencing and timelines.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised concerns regarding compatibility with operational planning requirements, contractual obligations, and differing national legal frameworks related to Indigenous rights and land-use processes.

f) Elements to be revised or recommendations: key recommendations focused on clarifying operational procedures and timelines, strengthening alignment with existing FSC requirements and rights-based frameworks, improving auditability and procedural consistency, ensuring culturally appropriate engagement, improving proportionality and operational feasibility, and clarifying how temporary suspension measures integrate into longer-term adaptive management processes.

Table 11 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 11 Summary of key feedback from participants for Clause 10: Ceasement of activities wherever Indigenous cultural landscapes and socio-cultural values are newly identified

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for precautionary protection of newly identified values	Several respondents support the precautionary logic of immediately ceasing management activities when previously unidentified Indigenous cultural landscapes or socio-cultural values are discovered. Positive comments recognize the importance of preventing harm while appropriate protection measures are developed.	a, f	FSC appreciates the positive feedback on the intent of this Clause. This clause is now revised and included as Clause 8.
2	Need for clearer operational procedures and implementation guidance	A recurring concern is that the Clause does not sufficiently explain how organizations should operationalize suspension of activities, assess newly identified values, or determine when operations may resume. Respondents request clearer stepwise procedures, timelines, responsibilities, and decision-making frameworks.	d, f	This is not an entirely new requirement, but an extension of IGI 3.5.3 to also include newly identified socio-cultural values. The revised Clause has been made more explicit by clarifying that management activities shall be suspended immediately, interim protection measures shall be implemented to prevent harm, and activities may only resume once appropriate protection measures have been agreed through FPIC-based processes, in accordance with applicable law.
3	Clause considered too vague, subjective, or difficult to operationalize	Several respondents indicate that concepts such as “newly identified values,” “protection measures,” and “agreement” remain insufficiently defined, creating uncertainty regarding implementation and operational consequences. Concerns are raised that the Clause may lead to inconsistent interpretation and operational paralysis if not more clearly bounded.	a, b, c, d	The revised Clause provides greater clarity regarding the sequence of actions required following the identification of new socio-cultural values, including suspension of activities, implementation of interim protection measures, and agreement on appropriate protection measures before operations may resume. See also response to point 2 above.
4	Auditability and verification concerns	Respondents repeatedly question how certification bodies will consistently verify whether newly identified values were appropriately assessed, whether operational suspension was justified, and whether protection measures were adequate. Concerns are raised regarding subjectivity and absence of standardized methodologies.	c, d	The revised Clause provides clearer operational expectations regarding the actions required following the identification of new socio-cultural values. Verification will rely on established FSC certification processes, auditor competence, documented implementation of the required measures, and evidence of culturally appropriate engagement and FPIC-based processes where applicable.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
5	Need for clearer definitions of Indigenous cultural landscapes and socio-cultural values	Several comments request clearer operational definitions and examples regarding Indigenous cultural landscapes, socio-cultural values, and the types of newly identified values that should trigger operational suspension. Respondents stress that concepts remain too broad and context-dependent.	d, f	Socio-cultural values and Indigenous Cultural Landscapes are inherently context-dependent. The revised Advice Note clarifies the concept of socio-cultural values and includes examples of categories of such values. FSC has started the development of further guidance on socio-cultural values to support the identification.
6	Need for stronger alignment with existing FSC requirements and rights frameworks	Some respondents note that similar precautionary approaches already exist within FSC requirements related to Indigenous Peoples and local communities. Comments request stronger alignment and clearer cross-referencing with existing IGIs and rights-based provisions to avoid duplication or inconsistency.	a, d, f	The revised Advice Note makes the cross-reference to IGI 3.5.3 more explicit, reinforcing alignment with the existing FSC normative framework and avoiding duplication of existing requirements.
7	Concerns regarding feasibility and operational impacts	Several respondents raise concerns regarding the practical implications of immediately suspending operations, particularly in active forestry operations where delays may generate significant operational, contractual, or economic consequences. Respondents request more proportionate and operationally realistic approaches.	b, c, f	FSC recognizes these concerns. As this requirement builds upon the existing provisions of IGI 3.5.3, Organizations should already have procedures in place for temporarily suspending activities when new values are identified. The revised Clause provides clearer operational expectations to facilitate consistent implementation.
8	Need for culturally appropriate and participatory approaches	Several comments stress that implementation must rely on culturally appropriate engagement processes and meaningful participation of Indigenous Peoples and traditional communities in identifying values and agreeing on protection measures.	b, d, f	This feedback has been incorporated into the revised Advice Note. The revised Clause explicitly requires that appropriate protection measures be agreed with the affected Indigenous Peoples and/or traditional peoples through FPIC-based processes before management activities may resume.
9	Concerns regarding applicability across different national and cultural contexts	Some respondents emphasize that Indigenous cultural landscapes and socio-cultural values differ significantly across regions and legal frameworks, requiring contextual flexibility and avoiding overly standardized implementation approaches.	b, d, f	FSC recognizes that socio-cultural values and Indigenous Cultural Landscapes are highly context-dependent. The revised Advice Note therefore relies on culturally appropriate engagement and FPIC-based processes, while recognizing

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
				that implementation shall be undertaken in accordance with applicable local or national laws.
10	Need for clearer linkage between precautionary suspension and adaptive management	Several comments indicate that the Clause does not sufficiently explain how temporary suspension measures should connect to longer-term adaptive management, monitoring, or integration into management plans.	b, c, d	The revised Advice Note provides a clearer linkage between the precautionary suspension of management activities and the subsequent management of newly identified socio-cultural values. Following the agreement of appropriate protection measures, these values become part of the broader management and monitoring framework established by the revised Advice Note, supporting their long-term maintenance through adaptive management.

Clause 11: Regeneration of vegetation cover

Q.53 Agreement with Clause 11: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 31 participants. Overall, 58% of respondents expressed agreement with the content, clarity, and intent of Clause 11 (agree and fully agree combined), while 19% expressed disagreement (disagree and fully disagree combined). An additional 23% of respondents selected the neutral option (Figure 72). The results indicate moderate support for Clause 11 among respondents. Agreement levels exceeded disagreement overall, although the relatively high proportion of neutral responses suggests that some stakeholders remained uncertain regarding the practical application and operational implications of the proposed regeneration requirements.

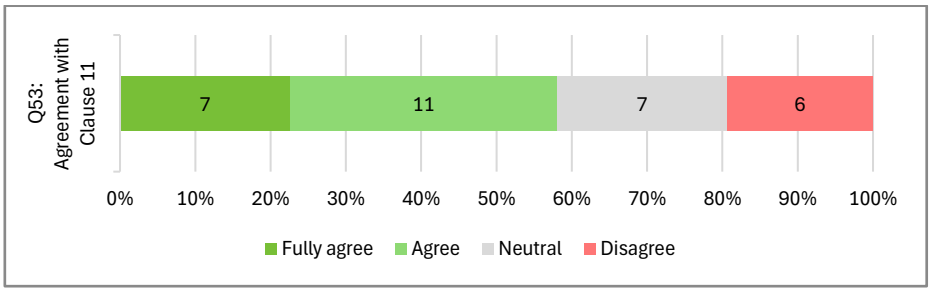

Figure 72 Agreement levels by all respondents for Clause 11

Across stakeholder types, FSC Members expressed relatively mixed responses, although agreement remained predominant overall. Certification Bodies/auditors, Certificate Holders, and Consultants expressed mainly positive assessments, while Other stakeholder groups showed more distributed responses across agreement, neutrality, and disagreement categories. FSC Network Partner staff and ASI staff responses were neutral overall. The distribution of responses by stakeholder type is presented in Figure 73.

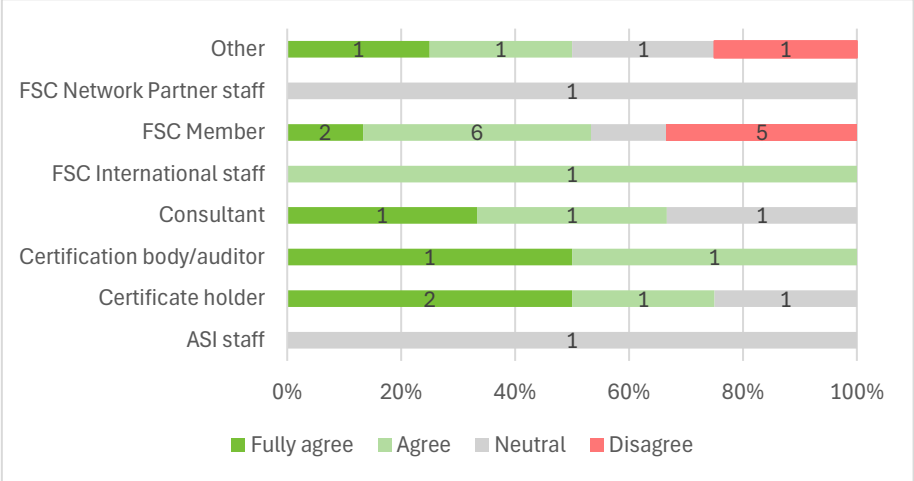

Figure 73 Agreement levels by stakeholder type for Clause 11: number of respondents

Differences across FSC membership chambers were also observed. Economic North respondents expressed predominantly positive assessments, including several “fully agree” responses. Environmental North respondents showed comparatively higher disagreement levels, while Economic South and Social South respondents generally expressed positive assessments overall. Respondents identifying as non-

members showed relatively mixed views distributed across neutrality and agreement categories. The distribution of responses by chamber is presented in Figure 74.

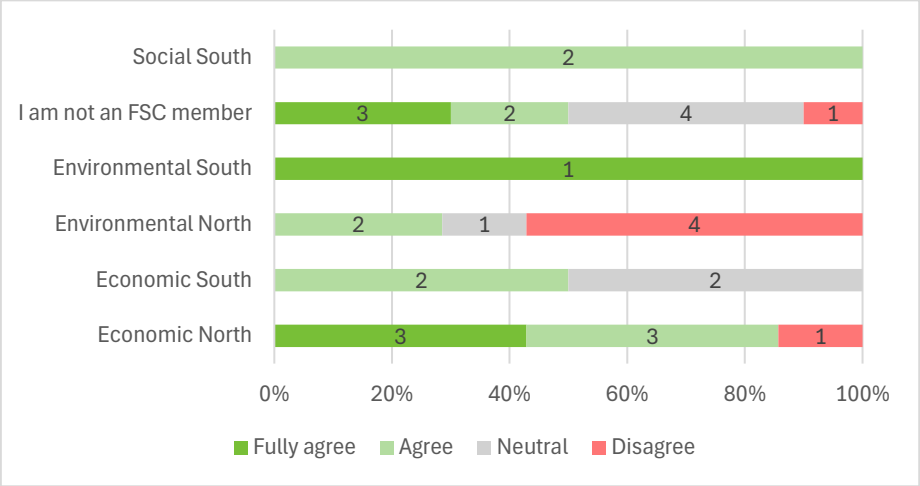

Figure 74 Agreement levels by FSC Membership Chambers for Clause 11: number of respondents.

Q.54 Clarity and practical applicability: How clear and practically applicable is this Clause, particularly regarding:

- the prioritization of natural and assisted natural regeneration
- the conditions under which artificial regeneration may be used
- the use of native species.

Please select on a scale of 1 to 5. (5 Very clear and applicable; 1 Very unclear or not applicable in practice)

A total of 28 participants responded to this question. Overall, 89% of respondents considered the proposed requirements to be at least moderately clear and applicable in practice (moderately clear/applicable, clear/mostly applicable, and very clear/applicable combined). In contrast, 11% of respondents considered the requirements unclear or difficult to apply in practice (Figure 75).

These results indicate comparatively strong confidence among respondents regarding the clarity and practical applicability of Clause 11. Compared to previous clauses, this question received one of the highest levels of positive assessment regarding operational clarity and implementation feasibility.

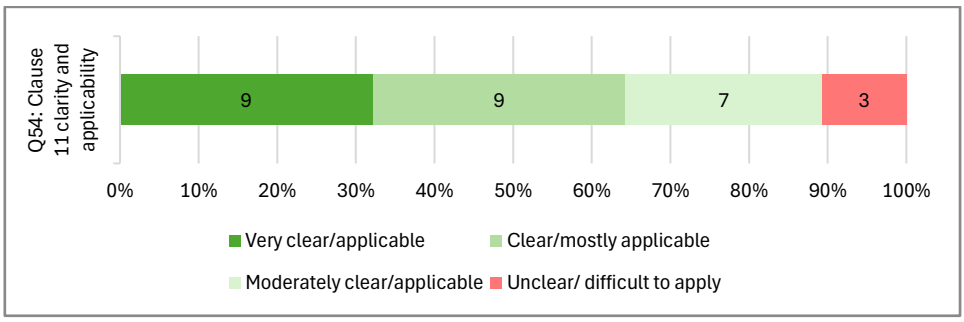

Figure 75 Clarity levels by all respondents for Clause 11.

Across stakeholder groups, FSC Members expressed predominantly positive assessments overall, although a small number of “unclear/difficult to apply” responses were also recorded. Certificate Holders,

Certification Bodies/auditors, Consultants, FSC International staff members, and Other stakeholder groups also expressed mainly positive views. FSC Network Partner staff and ASI staff responses remained moderate overall. The distribution of responses by stakeholder type is presented in Figure 76.

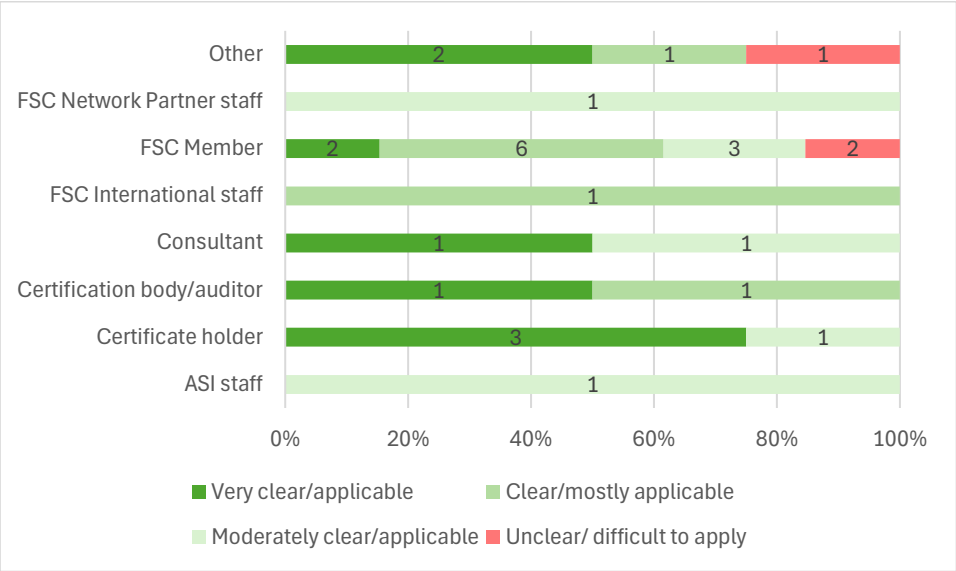

Figure 76 Clarity levels by stakeholder type for Clause 11: number of respondents

Differences among FSC membership chambers were also observed. Economic North respondents expressed particularly strong positive assessments, including several “very clear/applicable” responses. Economic South, Social South, Environmental South, and non-member respondents also expressed predominantly positive views overall. Environmental North respondents showed comparatively more mixed responses, although positive assessments still predominated. The distribution of responses by chamber is presented in Figure 77.

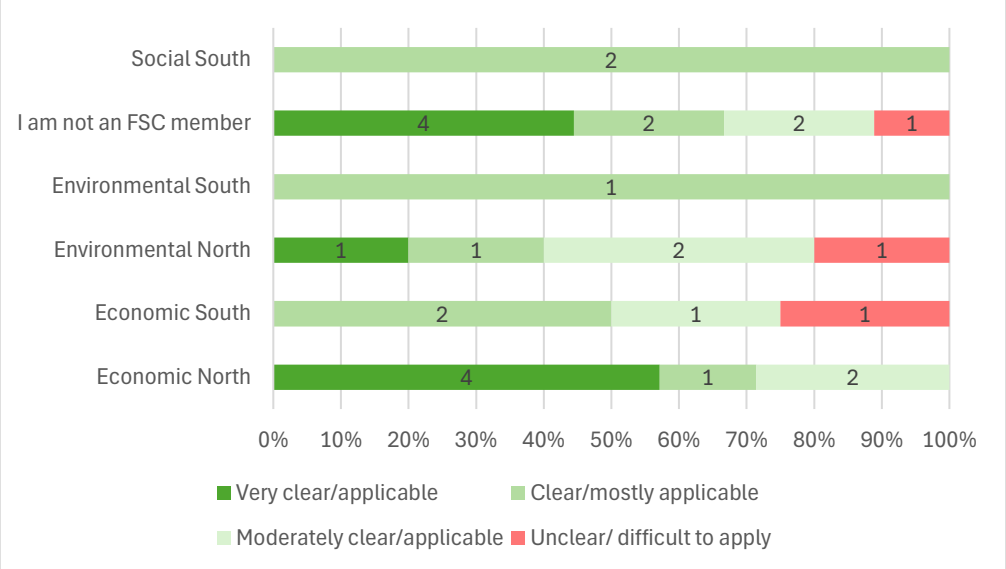

Figure 77 Clarity levels by FSC Membership Chambers for Clause 11: number of respondents

Open feedback for Clause 11

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 11:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause remains too broad and insufficiently operationalized, lacking clear thresholds and practical criteria for selecting regeneration approaches and assessing ecological outcomes consistently across contexts.

b) Practical implementation constraints: stakeholders identified challenges related to maintaining regeneration areas over long periods, ensuring accessibility for monitoring and interventions, managing costs, and adapting regeneration approaches to diverse ecological systems and species requirements.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently assess regeneration success, adequacy of interventions, and appropriateness of species selection in the absence of standardized methodologies and measurable criteria.

d) Further clarification or definitions required: multiple comments requested clearer definitions and operational guidance regarding “natural regeneration,” “assisted natural regeneration,” “artificial regeneration,” acceptable intervention thresholds, native species requirements, and ecological decision-making criteria.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised concerns regarding differing operational realities and forestry practices across jurisdictions and ecological contexts.

f) Elements to be revised or recommendations: key recommendations focused on clarifying decision-making criteria for regeneration approaches, improving contextual flexibility across ecological systems, strengthening operational feasibility and proportionality, improving auditability and monitoring expectations, clarifying linkage with ecological integrity objectives, and reducing ambiguity and excessive process-oriented wording.

Table 12 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 12 Summary of key feedback from participants for Clause 11: Regeneration of vegetation cover

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for prioritizing natural and assisted natural regeneration	Several respondents support prioritizing natural and assisted natural regeneration approaches and limiting the use of artificial regeneration. Positive comments recognize the ecological relevance of maintaining native species composition and supporting recovery processes aligned with ecological integrity objectives.	a, f	FSC appreciates the positive feedback on this Clause. The regeneration requirement has been integrated into Clause 6 of the revised Advice Note, which continues to prioritize natural regeneration, including assisted natural regeneration, while allowing artificial regeneration where justified to restore species.
2	Need for clearer operational criteria for regeneration approaches	A major recurring concern is that the Clause does not sufficiently explain under which ecological or operational conditions natural, assisted natural, or artificial regeneration approaches should be applied. Respondents request clearer decision-making criteria and operational guidance.	d, f	The regeneration requirement has been integrated into Clause 6 of the revised Advice Note. The revised Clause clarifies that forest operations shall ensure natural regeneration, including assisted natural regeneration, or other methodologies using native species where these are the most effective and relevant approaches for regeneration. Artificial regeneration may be used where justified to restore species.
3	Clause considered too vague or difficult to operationalize consistently	Several respondents indicate that the Clause remains relatively broad and interpretive, lacking sufficiently measurable thresholds or operationally specific expectations regarding regeneration methods and ecological outcomes.	a, b, c, d	The regeneration requirement has been integrated into Clause 6 of the revised Advice Note and linked directly to the broader management objective of maintaining ecological integrity features while minimizing site-level disturbances. This provides a clearer operational context for applying regeneration measures.
4	Auditability and verification concerns	Respondents repeatedly question how certification bodies will consistently verify adequacy of regeneration approaches, success of natural regeneration processes, and appropriateness of species selection. Concerns are raised regarding long-term ecological monitoring and accessibility of regeneration areas.	c, d	The revised Clause provides a clearer basis for verification by specifying the expected regeneration approaches and linking them to the management of ecological integrity features. Verification will rely on established FSC certification processes, Best Available Information, and documented evidence supporting the regeneration approach adopted by the Organization.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
5	Need for clearer definitions and terminology	Several comments request clearer definitions and guidance regarding “natural regeneration,” “assisted natural regeneration,” “artificial regeneration,” “native species,” and acceptable intervention thresholds.	d, f	The revised Advice Note clarifies the expected regeneration approaches and their relationship with native species. The terminology should also be interpreted in conjunction with the existing FSC normative framework, including the referenced International Generic Indicators. Additional planned guidance can further support consistent interpretation where needed.
6	Concerns regarding feasibility and operational costs	Some respondents highlight that supporting regeneration processes, maintaining access to regeneration sites, and monitoring regeneration outcomes over time may generate significant operational and financial burdens, particularly in remote tropical forest contexts.	b, c, f	FSC recognizes these concerns. The revised Clause maintains flexibility by allowing Organizations to apply the regeneration methodology that is most effective and relevant for the specific context, while permitting artificial regeneration where justified. This supports proportionate implementation across different operational conditions.
7	Concerns regarding accessibility and long-term maintenance of regeneration areas	Several comments note that maintaining accessibility to regeneration sites for monitoring or intervention purposes may itself create operational and ecological challenges, including increased costs and potential facilitation of illegal access or activities.	b, c, f	FSC recognizes that regeneration and subsequent monitoring may present practical challenges in some operational contexts. The revised Advice Note does not prescribe specific access or maintenance methods, allowing Organizations to implement regeneration and monitoring using approaches appropriate to the local context, while ensuring consistency with the broader monitoring requirements established in Part III of the Advice Note.
8	Need for contextual flexibility across ecological systems	Respondents emphasize that regeneration dynamics vary significantly across species, ecosystems, and forest types. Several comments note that some species may require specific disturbance conditions or interventions to regenerate successfully, requiring more contextual flexibility.	b, d, f	This concern is recognized in the revised Advice Note. Clause 6 allows Organizations to apply natural regeneration, assisted natural regeneration, or other methodologies using native species according to what is most effective and relevant for the ecological context, while permitting artificial regeneration where justified. Further regional and ecosystem-specific approaches will be considered during Phase 2 (V2-0).

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
9	Need for clearer linkage between regeneration approaches and ecological integrity objectives	Some respondents indicate that the Clause should more clearly explain how regeneration approaches contribute to long-term ecological recovery, maintenance of critical landscape integrity features, and broader IFL management objectives.	b, d, f	This concern has been addressed through the restructuring of the revised Advice Note. The regeneration requirement is now incorporated within Clause 6, which links regeneration directly to maintaining ecological integrity features and minimizing site-level disturbances as part of the broader forest management approach.
10	General concerns regarding excessive process-oriented wording and interpretive burden	Some respondents reiterate broader concerns that the Advice Note introduces highly interpretive and process-heavy requirements that may increase inconsistency and implementation complexity across FSC-certified operations.	a, c, f	The Advice Note has been substantially revised to simplify its structure and reduce complexity. Rather than retaining regeneration as a standalone Clause, the revised Advice Note integrates it into Clause 6 within the broader management requirements. Phase 2 (V2-0) will further develop context-specific approaches to support clearer and more consistent implementation.

Clause 12: Restoration measures to accelerate recovery

Q.58 Agreement with Clause 12: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 30 participants. Overall, 63% of respondents expressed agreement with the content, clarity, and intent of Clause 12 (agree and fully agree combined), while 13% expressed disagreement (disagree and fully disagree combined). An additional 23% of respondents selected the neutral option. The results indicate generally positive support for Clause 12 among respondents. Agreement levels clearly exceeded disagreement levels, although the relatively high proportion of neutral responses suggests that some stakeholders remained uncertain regarding the operational implications and implementation approaches related to restoration and recovery requirements (Figure 78).

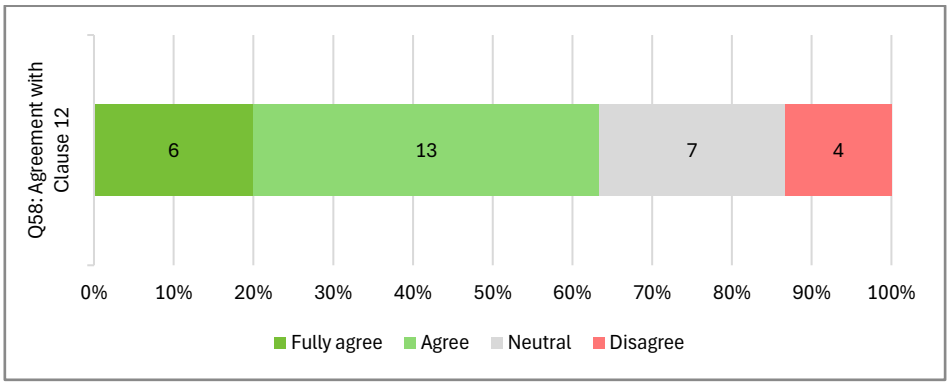

Figure 78 Agreement levels by all respondents for Clause 12

Across stakeholder types, FSC Members expressed predominantly positive assessments overall, although some disagreement responses were also recorded. Certification Bodies/auditors, Certificate Holders, and Other stakeholder groups expressed mainly positive views, while Consultants and FSC Network Partner staff responses leaned more toward neutrality. ASI staff responses were neutral overall. The distribution of responses by stakeholder type is presented in Figure 79.

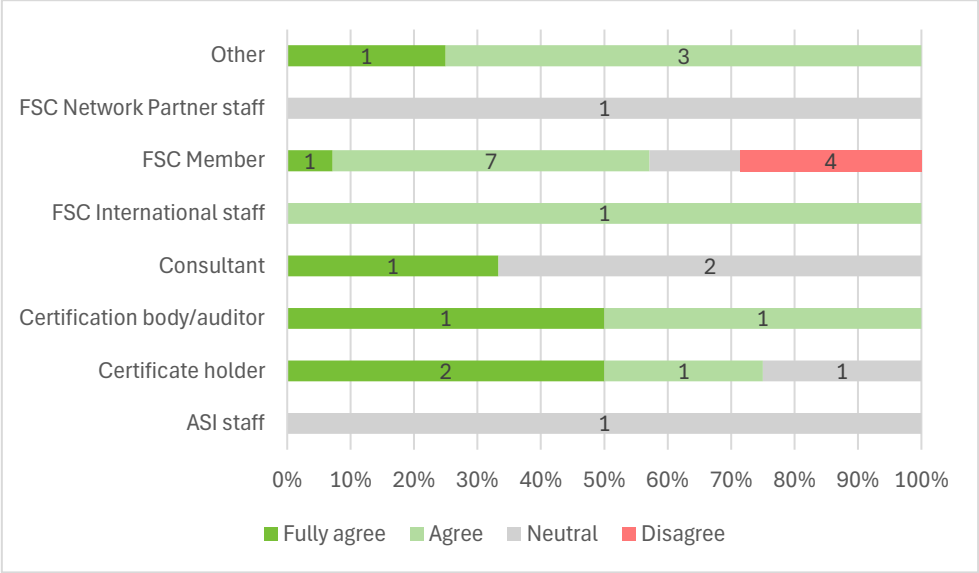

Figure 79 Agreement levels by stakeholder type for Clause 12: number of respondents

Differences across FSC membership chambers were also observed. Economic South, Social South, Environmental South, and non-member respondents expressed predominantly positive assessments of the Clause. Environmental North respondents showed comparatively more mixed views, including several disagreement responses, while Economic North respondents expressed mainly positive assessments overall despite some neutrality. The distribution of responses by chamber is presented in Figure 80.

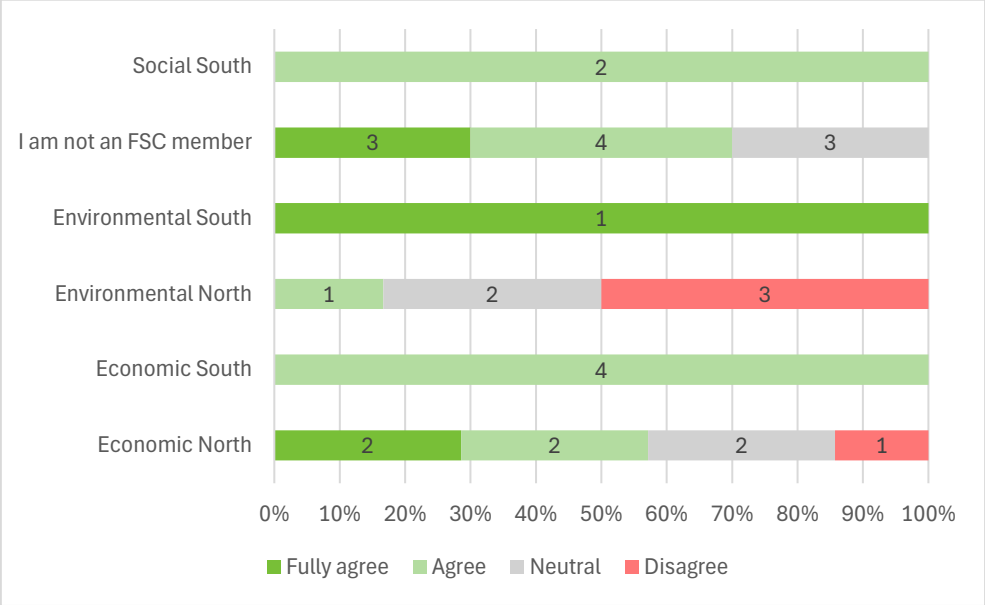

Figure 80 Agreement levels by FSC Membership Chambers for Clause 12: number of respondents

Q.59 Clarity and practical applicability: How clear and practically applicable is this Clause, particularly regarding:

- determining when natural or assisted regeneration is insufficient
- implementing restoration measures to accelerate recovery
- co-defining restoration targets and long-term conditions through culturally appropriate
- engagement

Please select on a scale of 1 to 5. (5 Very clear and applicable; 1 Very unclear or not applicable in practice)

A total of 27 participants responded to this question. Overall, 93% of respondents considered the proposed requirements to be at least moderately clear and applicable in practice (moderately clear/applicable, clear/mostly applicable, and very clear/applicable combined). In contrast, 7% of respondents considered the requirements unclear or difficult to apply in practice. These results indicate very strong positive assessments regarding the clarity and practical applicability of Clause 12. Compared to previous clauses, this question received one of the highest levels of positive support regarding operational applicability and implementation clarity (Figure 81).

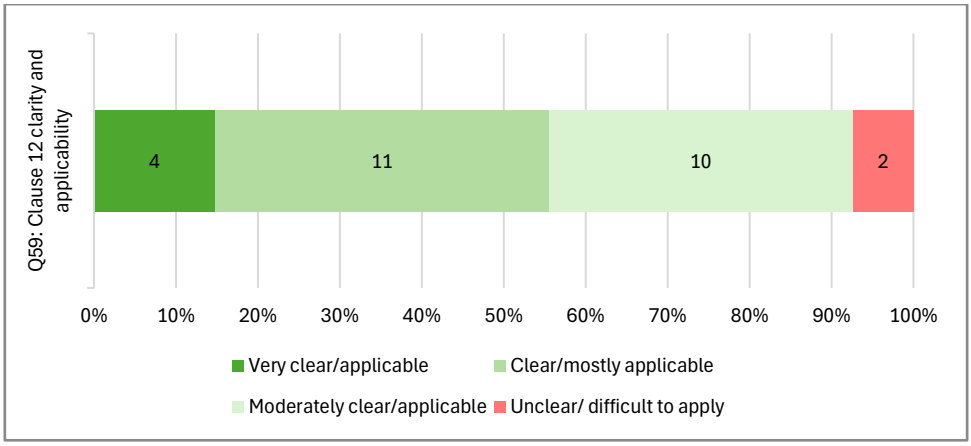

Figure 81 Clarity levels by all respondents for Clause 12

Across stakeholder groups, FSC Members expressed predominantly positive assessments overall, although a small number of "unclear/difficult to apply" responses were also recorded. Certification Bodies/auditors, Certificate Holders, Consultants, FSC International staff members, FSC Network Partner staff, and Other stakeholder groups also expressed mainly positive views. The distribution of responses by stakeholder type is presented in Figure 82.

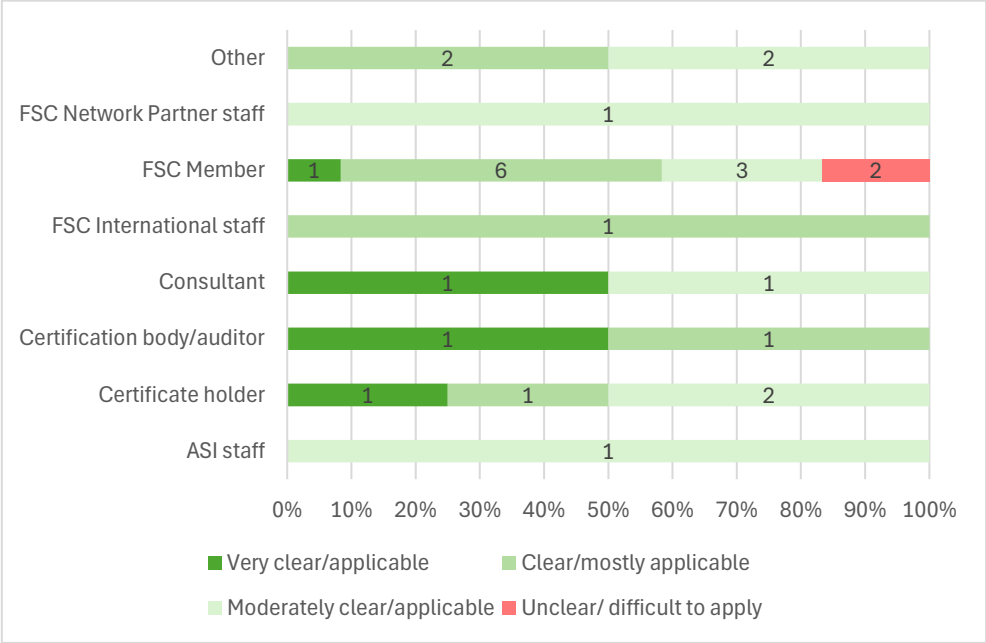

Figure 82 Clarity levels by stakeholder type for Clause 12: number of respondents

Differences among FSC membership chambers were also observed. Economic South, Social South, Environmental South, and non-member respondents expressed consistently positive assessments regarding clarity and applicability. Economic North respondents expressed mostly moderate and positive assessments overall, while Environmental North respondents showed comparatively more mixed responses, although positive assessments still predominated. The distribution of responses by chamber is presented in Figure 83.

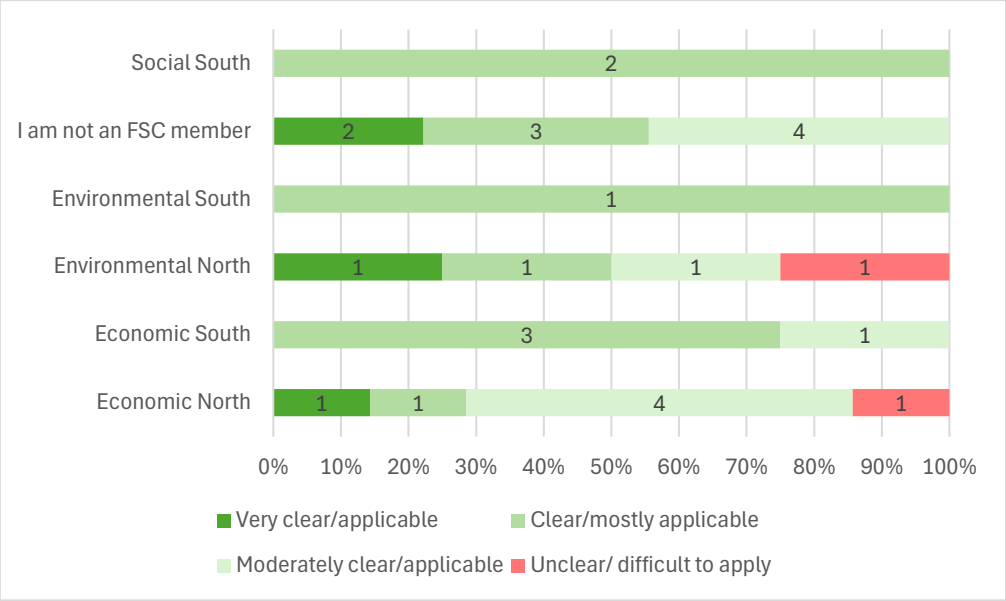

Figure 83 Agreement levels by FSC Membership Chambers for Clause 12: number of respondents

Open feedback for Clause 12

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 12:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause remains broad and insufficiently operationalized, particularly regarding determination of regeneration insufficiency, restoration expectations, and ecological recovery objectives. Several comments also questioned whether some restoration expectations are ecologically realistic across all forest systems.

b) Practical implementation constraints: stakeholders identified challenges related to determining appropriate restoration interventions, adapting restoration approaches to different ecological systems and species, conducting culturally appropriate engagement, and managing the costs and operational burden associated with long-term restoration and monitoring.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently assess regeneration insufficiency, effectiveness of restoration interventions, and achievement of long-term recovery objectives in the absence of standardized methodologies and measurable criteria.

d) Further clarification or definitions required: multiple comments requested clearer definitions and operational guidance regarding “restoration,” “recovery,” “insufficient regeneration,” “reference conditions,” restoration methodologies, and culturally appropriate co-definition processes.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised concerns regarding differing ecological management realities and operational forestry practices across jurisdictions and ecosystems.

f) Elements to be revised or recommendations: key recommendations focused on clarifying ecological decision-making criteria and restoration thresholds, improving contextual flexibility across forest systems and species, strengthening auditability and monitoring expectations, clarifying restoration methodologies and recovery objectives, improving proportionality and feasibility, and strengthening guidance for culturally appropriate engagement and co-definition processes.

Table 13 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 13 Summary of key feedback from participants for Clause 12: Restoration measures to accelerate recovery

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for restoration-oriented approaches and long-term recovery objectives	Several respondents support the inclusion of restoration measures aimed at accelerating ecological recovery where natural or assisted regeneration is insufficient. Positive comments recognize the relevance of restoration approaches integrated with culturally appropriate engagement and long-term ecological objectives.	a, f	FSC appreciates the positive feedback on the intent of this Clause. The consulted Clause was removed as a standalone provision. The relevant concepts were retained and integrated into Clauses 6 and 7 of the revised Advice Note, addressing ecological integrity features and socio-cultural values, respectively.
2	Need for clearer operational criteria for determining insufficiency of regeneration	A major recurring concern is that the Clause does not sufficiently explain how organizations should determine when natural or assisted regeneration is considered insufficient and when restoration interventions become necessary. Respondents request clearer ecological thresholds, decision criteria, and methodologies.	d, f	The consulted Clause was removed from the revised Advice Note. Rather than establishing a separate trigger based on "insufficient regeneration," the revised Clause 6 specifies the regeneration approaches that should be applied, including natural regeneration, assisted natural regeneration, other methodologies using native species where appropriate, and artificial regeneration where justified.
3	Clause considered broad or difficult to operationalize consistently	Several respondents indicate that the Clause relies on broad ecological concepts without sufficiently measurable or operationally specific implementation expectations. Concerns are raised regarding interpretation consistency and practical applicability across different forest systems.	a, b, c, d	The consulted Clause was removed as a standalone provision. The relevant requirements were integrated into Clause 6, where regeneration is addressed as part of the broader management of ecological integrity features, providing a more streamlined and operationally focused approach.
4	Auditability and verification concerns	Respondents repeatedly question how certification bodies will consistently verify regeneration insufficiency, adequacy of restoration interventions, long-term effectiveness of restoration measures, and achievement of recovery objectives.	c, d	The removal of the standalone restoration Clause also removes the need to verify when regeneration is considered "insufficient" before restoration measures are triggered. Instead, verification focuses on the implementation of the regeneration and management requirements established in Clause 6 using the existing FSC assurance framework.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
5	Need for contextual flexibility across ecological systems and species	Several comments emphasize that ecological recovery dynamics differ significantly across species, disturbance regimes, and forest systems. Respondents note that some species require disturbance conditions or active interventions that may appear inconsistent with strict canopy preservation approaches.	b, d, f	This concern has been addressed in the revised Advice Note. Clause 6 allows Organizations to apply natural regeneration, assisted natural regeneration, or other methodologies using native species according to what is most effective and relevant for the ecological context, while permitting artificial regeneration where justified. Further regional and ecosystem-specific approaches will be considered during Phase 2 (V2-0).
6	Concerns regarding ecological realism of restoration expectations	Some respondents question whether restoration targets and reference conditions are ecologically realistic or achievable in all contexts, particularly under changing climate conditions or in highly dynamic forest ecosystems.	a, d, f	The consulted restoration-based approach was not retained as a standalone requirement in the revised Advice Note. Instead, the revised approach focuses on selecting regeneration methodologies that are appropriate for the specific ecological context, avoiding prescriptive restoration expectations that may not be suitable across all forest ecosystems.
7	Need for clearer definitions and methodologies	Several comments request clearer operational definitions and guidance regarding “restoration,” “recovery,” “insufficient regeneration,” “reference conditions,” and appropriate restoration methodologies.	d, f	The removal of the standalone restoration Clause also removes the need to define concepts such as "insufficient regeneration" and associated restoration triggers. The revised Advice Note establishes a clear provision to ensure regeneration and mentions relevant regeneration methodologies in Clause 6.
8	Concerns regarding long-term effectiveness and monitoring of restoration	Respondents note that long-term effectiveness of restoration and regeneration measures may be difficult to assess within certification timeframes and may require monitoring over extended ecological timescales.	b, c, d	The revised Advice Note no longer establishes a separate restoration requirement requiring verification of long-term restoration success. Instead, regeneration and the maintenance of ecological integrity features are addressed through the broader management and monitoring framework established in the Advice Note.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
9	Need for culturally appropriate engagement and co-definition of restoration targets	Several comments support the inclusion of culturally appropriate engagement processes and co-definition of restoration objectives with Indigenous Peoples and traditional communities, while also requesting clearer operational guidance for these processes.	b, d, f	The consulted Clause was removed as a standalone provision. The revised Advice Note instead integrates culturally appropriate engagement throughout the identification, management and monitoring of socio-cultural values, including the requirements established under Clauses 3 and 7.
10	Concerns regarding implementation costs and feasibility	Some respondents highlight that restoration interventions and long-term monitoring may generate substantial operational and financial burdens, especially in remote tropical contexts or large-scale landscapes.	b, c, f	The removal of the standalone restoration Clause simplifies the revised Advice Note and reduces the implementation burden associated with determining regeneration insufficiency and applying separate restoration requirements. The revised approach provides greater flexibility by allowing Organizations to select regeneration methodologies appropriate to their ecological and operational context, while further context-specific approaches will be considered during Phase 2 (V2-0).

4. Clauses related to monitoring

Clause 13: Monitoring programme for the critical landscape integrity features and socio-cultural values

Q.58 Agreement with Clause 13: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 31 participants. Overall, 45% of respondents expressed agreement with the content, clarity, and intent of Clause 13 (agree and fully agree combined), while 29% expressed disagreement (disagree and fully disagree combined). An additional 26% of respondents selected the neutral option. The results indicate comparatively mixed stakeholder views regarding Clause 13. Although agreement levels exceeded disagreement overall, the relatively high proportion of neutral and disagreement responses suggests significant uncertainty and concern regarding the proposed monitoring-related requirements and their practical implementation (Figure 84).

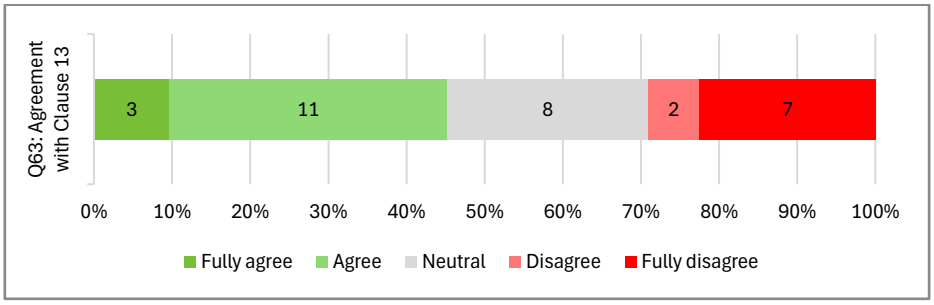

Figure 84 Agreement levels by all respondents for Clause 13

Across stakeholder groups, FSC Members expressed the broadest range of responses, including both strong support and comparatively higher disagreement levels. FSC Network Partner staff responses were predominantly negative, while Certification Bodies/auditors, Certificate Holders, and Other stakeholder groups expressed more positive assessments overall. Consultants expressed mixed views distributed across agreement, neutrality, and disagreement categories. ASI staff and FSC International staff responses leaned more toward neutrality or disagreement. The distribution of responses by stakeholder type is presented in Figure 85.

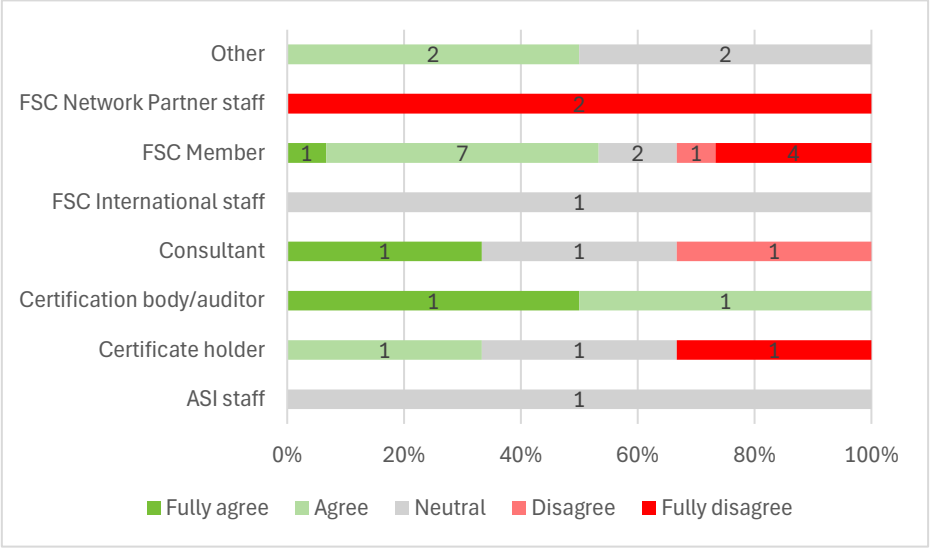

Figure 85 Agreement levels by stakeholder type for Clause 13: number of respondents

Differences across FSC membership chambers were also observed. Economic South and Social South respondents expressed predominantly positive views regarding the Clause, while Environmental North respondents showed comparatively more mixed responses, including disagreement and neutrality. Economic North respondents also expressed mixed views distributed across disagreement, neutrality, and agreement categories. Respondents identifying as non-members showed relatively high neutrality levels combined with both agreement and disagreement responses. The distribution of responses by chamber is presented in Figure 86.

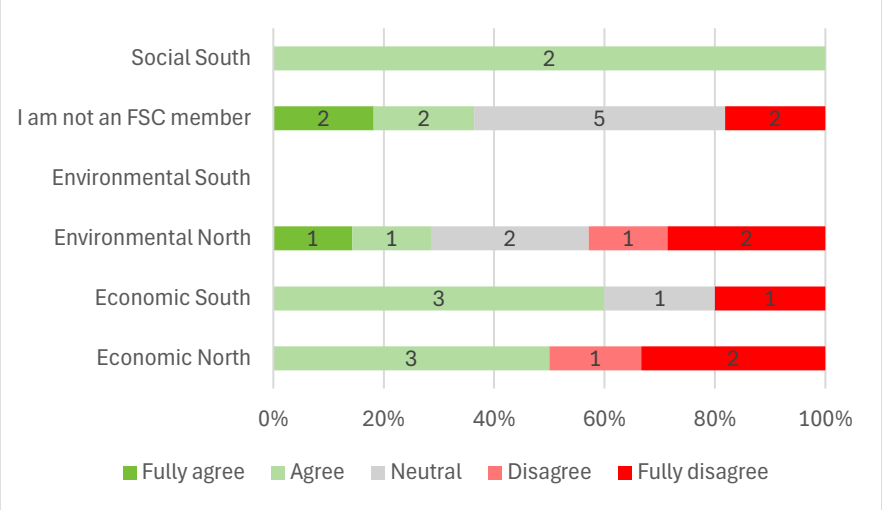

Figure 86 Agreement levels by FSC Membership Chambers for Clause 13: number of respondents

Q.64 Clarity, feasibility and auditability: How clear and practically feasible and auditable is this Clause, particularly regarding:

- the design and implementation of a monitoring program
- the use of consistent and reliable sampling methods, metrics, and data collection approaches
- the integration of Traditional Ecological Knowledge and community-based monitoring
- ensuring participation and access to information for Indigenous Peoples and/or traditional peoples
- the use of monitoring results in adaptive management

Please select on a scale of 1 to 5. (5 Very clear/feasible and auditable; 1 Very unclear/not feasible or not auditable in practice)

A total of 27 participants responded to this question. Overall, 63% of respondents considered the proposed requirements to be at least moderately clear, feasible, and auditable in practice (moderately clear/feasible/auditable, clear/mostly feasible/auditable, and very clear/feasible/auditable combined). In contrast, 37% of respondents considered the requirements unclear, difficult to implement, or not feasible/auditable in practice (Figure 87).

These results indicate comparatively divided stakeholder views regarding the operational feasibility and auditability of Clause 13. While most respondents considered the requirements at least moderately feasible and auditable, a substantial proportion expressed concerns regarding complexity, technical burden, and implementation practicality.

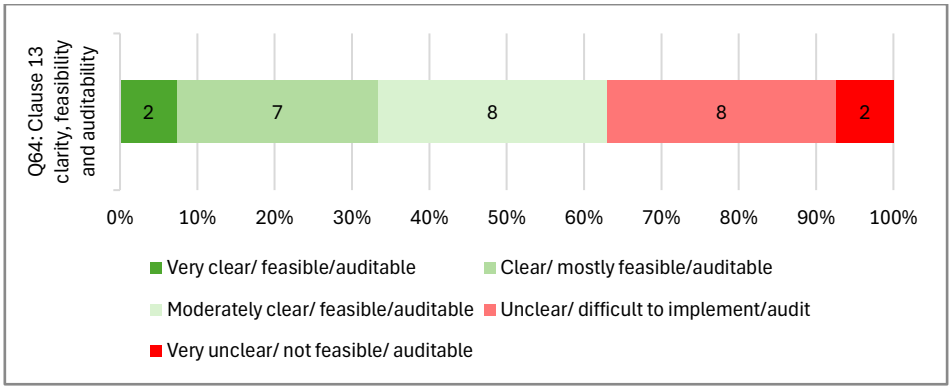

Figure 87 Feasibility and auditability levels by all respondents for Clause 13

Across stakeholder groups, FSC Members expressed predominantly moderate assessments, although several respondents also considered the Clause difficult to implement or audit. Certification Bodies/auditors and some Certificate Holders expressed comparatively positive views overall, while FSC Network Partner staff, FSC International staff, Consultants, and ASI staff expressed more mixed or critical assessments. The distribution of responses by stakeholder type is presented in Figure 88.

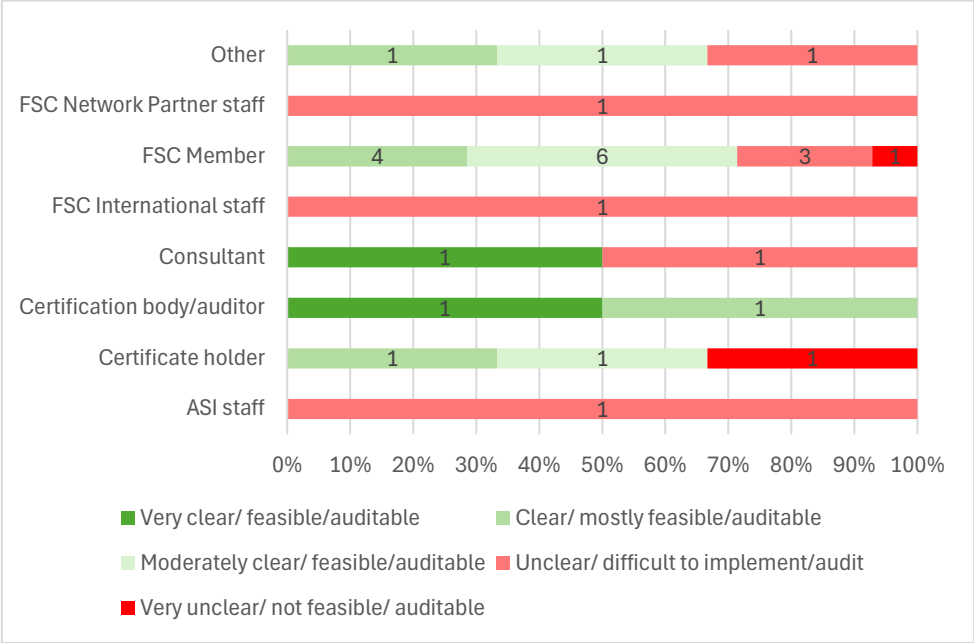

Figure 88 Feasibility and auditability levels by stakeholder type for Clause 13: number of respondents

Differences among FSC membership chambers were also observed. Economic South and Social South respondents generally expressed positive assessments overall, while Economic North and Environmental North respondents showed comparatively more mixed and critical views regarding feasibility and auditability. Non-member respondents also expressed comparatively higher levels of uncertainty and difficulty regarding implementation. The distribution of responses by chamber is presented in Figure 89.

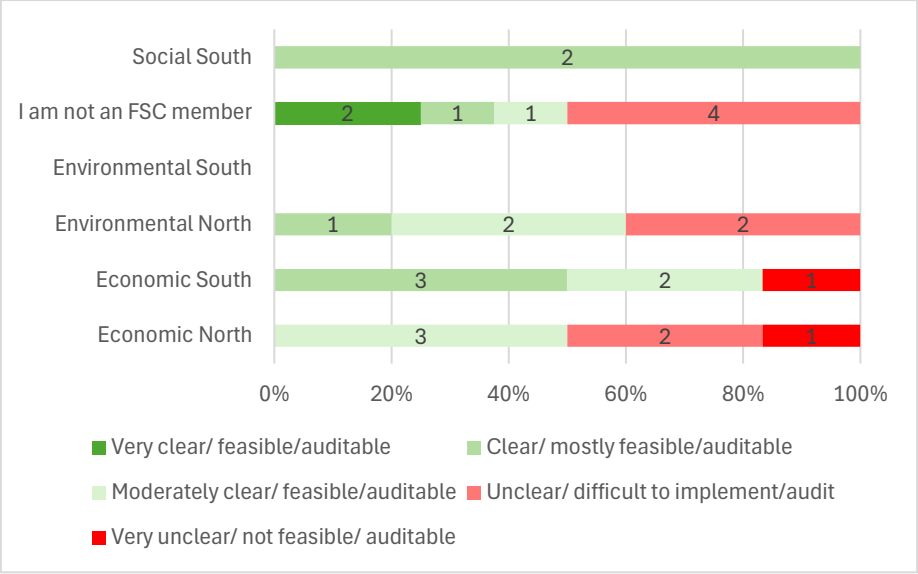

Figure 89 Feasibility and auditability levels by FSC Membership Chambers for Clause 13: number of respondents

Open feedback for Clause 13

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 13:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause introduces an excessively complex and resource-intensive monitoring framework that may not align with Motion 45 objectives of reducing complexity and supporting practical implementation. Several comments also questioned whether the proposed monitoring expectations are proportionate and realistically achievable across different contexts and certification cycles.

b) Practical implementation constraints: stakeholders identified challenges related to long-term monitoring obligations, technical capacity, data collection requirements, participatory monitoring processes, integration of Traditional Ecological Knowledge (TEK), and the costs associated with large-scale ecological monitoring systems, particularly in remote tropical contexts and for organizations with limited resources.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently assess monitoring quality, adaptive management responses, and adequacy of ecological and socio-cultural monitoring systems in the absence of standardized methodologies, measurable expectations, and clear evidence requirements.

d) Further clarification or definitions required: multiple comments requested clearer operational definitions and guidance regarding “scientifically reliable methods,” “sampling design,” “reference state,” “adaptive management,” monitoring frequency, acceptable indicators, and minimum certifiable monitoring expectations.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified.

f) Elements to be revised or recommendations: key recommendations focused on simplifying and streamlining monitoring requirements, improving proportionality and scalability, clarifying methodologies and minimum evidence expectations, strengthening alignment with Motion 45 and regional adaptation approaches, improving auditability and adaptive management logic, and clarifying how TEK and participatory monitoring should be operationalized in practice.

Table 14 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 14 Summary of key feedback from participants for Clause 13: Monitoring programme for the critical landscape integrity features and socio-cultural values

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for monitoring-based and adaptive management approaches	Several respondents support the overall objective of establishing structured monitoring systems for IFL management and adaptive management. Positive comments recognize the importance of integrating ecological monitoring, Traditional Ecological Knowledge (TEK), and participation of Indigenous Peoples and traditional communities into long-term management approaches.	a, f	FSC appreciates the positive feedback on this Clause. The revised Advice Note retains monitoring and adaptive management as core elements of the approach, while simplifying and restructuring the monitoring requirements into Clauses 10-12.
2	Need for clearer operationalization of monitoring requirements	A major recurring concern is that the Clause establishes a highly ambitious monitoring framework without sufficiently clear operational guidance regarding methodologies, Clauses, metrics, responsibilities, or minimum evidence requirements. Respondents request more practical and scalable monitoring expectations.	d, f	This concern has been addressed through a substantial revision of the monitoring section. The revised Advice Note separates the monitoring requirements into three Clauses covering: (i) what shall be monitored, (ii) how monitoring shall be conducted, and (iii) how monitoring results shall be incorporated into adaptive management. FSC has also started the development of guidance to support implementation of the monitoring requirements.
3	Clause perceived as too complex, process-heavy, or resource-intensive	Several respondents indicate that the monitoring system proposed is excessively complex and may generate unrealistic technical and financial burdens, especially in remote tropical contexts or for organizations with limited scientific capacity. Concerns are raised regarding long-term data collection, multi-Clause systems, and extensive participatory monitoring expectations.	a, b, c, f	The monitoring section has been substantially simplified in the revised Advice Note. The consultation draft contained six monitoring Clauses (13-18), whereas the revised Advice Note consolidates these into three Clauses (10-12), reducing complexity while retaining the key monitoring objectives. Further context-specific approaches will be considered during Phase 2 (V2-0).
4	Auditability and verification concerns	Respondents repeatedly question how certification bodies will consistently verify monitoring quality, reliability of methodologies, adequacy of sampling approaches, and adaptive management responses. Concerns are raised regarding subjectivity, inconsistent data quality, and the absence of standardized monitoring protocols.	c, d	The revised Advice Note provides a clearer framework for monitoring by distinguishing the monitoring parameters, monitoring methodologies and adaptive management requirements. FSC has also started the development of guidance to support implementation of the monitoring

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
				requirements. which is expected to support consistent verification by certification bodies.
5	Need for proportionality and feasibility	Several comments stress that monitoring expectations should remain proportionate to organizational size, risk, ecological context, available data, and technical capacity. Respondents repeatedly request clearer distinction between minimum certifiable monitoring requirements and more advanced or region-specific monitoring systems.	b, d, f	The revised Advice Note simplifies the monitoring framework and explicitly requires monitoring approaches that are scalable and tailored to the identified risks to ecological integrity features and socio-cultural values. Further consideration of minimum and region-specific monitoring requirements will form part of Phase 2 (V2-0).
6	Need for clearer definitions and methodologies	Multiple respondents request clearer guidance regarding “scientifically reliable methods,” “sampling design,” “reference state,” “adaptive management,” “recovery Clauses,” and acceptable monitoring methodologies. Concerns are raised that many concepts remain too open to interpretation.	d, f	The monitoring requirements have been substantially revised and simplified. The revised Advice Note provides clearer expectations regarding monitoring methodologies, including the use of scientifically established methods, spatially replicated sampling designs, relevant monitoring timeframes, and reference states. FSC has also started the development of guidance to support implementation of the monitoring requirements.
7	Concerns regarding long-term monitoring obligations	Several comments highlight uncertainty regarding the duration, frequency, and long-term responsibilities associated with monitoring obligations. Respondents question how monitoring expectations can realistically be maintained across certification cycles and over ecological timescales relevant for IFL recovery.	a, b, c, d	The revised Advice Note clarifies that monitoring timeframes should be relevant to the ecological integrity features and socio-cultural values being monitored and should support adaptive management within the management plan, rather than prescribing fixed monitoring periods.
8	Need for stronger alignment with Motion 45 and regional adaptation approaches	Multiple respondents stress that monitoring systems should remain aligned with Motion 45 objectives of reducing complexity and promoting context-specific approaches. Some comments request stronger integration with national biodiversity frameworks, Motion 23 pilot approaches, and regionally adapted methodologies.	a, d, f	The revised Advice Note simplifies the monitoring framework while maintaining its outcome-based approach consistent with Motion 45. Further development of region-specific monitoring approaches and methodologies will be considered during Phase 2 (V2-0).

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
9	Concerns regarding participatory monitoring and TEK integration	While the inclusion of TEK and community participation is broadly supported, several respondents request clearer expectations regarding roles, methodologies, participation responsibilities, and how TEK should be integrated into scientifically robust monitoring systems.	b, d, f	The revised Advice Note retains the integration of Traditional Ecological Knowledge (TEK) and community-based monitoring, while clarifying that Organizations shall support the effective participation of Indigenous Peoples and/or traditional peoples in monitoring activities and provide meaningful access to monitoring information.
10	Need for clearer linkage between monitoring and management decisions	Several comments indicate that the Clause does not sufficiently explain how monitoring results should trigger management adjustments, corrective actions, or adaptive responses. Respondents request clearer operational decision-making frameworks linked to monitoring outcomes.	b, c, d	This concern has been addressed through the restructuring of the monitoring section. The revised Advice Note introduces a dedicated Clause requiring Organizations to update and adapt their management plans based on the findings of monitoring activities and other relevant monitoring and evaluation initiatives, thereby establishing a clearer link between monitoring and adaptive management.
11	Concerns regarding applicability across different ecological contexts	Some respondents emphasize that monitoring methodologies, ecological Clauses, and recovery expectations will differ significantly across tropical, boreal, and other forest systems, requiring greater contextual flexibility and regionally adapted approaches.	b, d, f	The revised Advice Note requires monitoring methodologies to be tailored to the identified risks to ecological integrity features and socio-cultural values, while remaining scalable and capable of generating credible data. Further regional adaptation of monitoring approaches will be considered during Phase 2 (V2-0).
12	General concerns regarding excessive Clause proliferation	Several respondents reiterate broader concerns that the Advice Note introduces too many detailed Clauses and excessive process-oriented requirements, potentially undermining feasibility, cost-effectiveness, and certification attractiveness.	a, b, f	The Advice Note has been substantially revised to simplify its structure. The consultation draft contained 18 Clauses, whereas the revised Advice Note contains 12. In particular, the monitoring section was consolidated from six Clauses to three, reducing duplication while maintaining the overall intent of the monitoring framework.

Clause 14: Monitoring in undisturbed control areas vs areas under forest operations

Q.68 Agreement with Clause 14: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 26 participants. Overall, 58% of respondents expressed agreement with Clause 14 (agree and fully agree combined), while 23% expressed disagreement (disagree and fully disagree combined). An additional 19% of respondents selected the neutral option. The results indicate generally positive support for Clause 14 among respondents, although a notable proportion of disagreement and neutral responses suggests continuing concerns regarding the technical complexity and operational feasibility of the proposed comparative monitoring approaches (Figure 90).

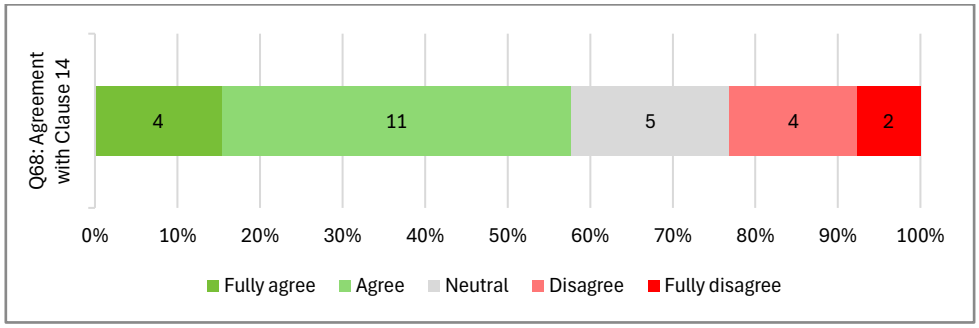

Figure 90 Agreement levels by all respondents for Clause 14

Across stakeholder groups, FSC Members expressed predominantly positive assessments overall, although some disagreement responses were also recorded. Certification Bodies/auditors, Certificate Holders, and FSC International staff members expressed mainly positive views, while Consultants and Other stakeholder groups showed comparatively more mixed responses. ASI staff responses were neutral overall. The distribution of responses by stakeholder type is presented in Figure 91.

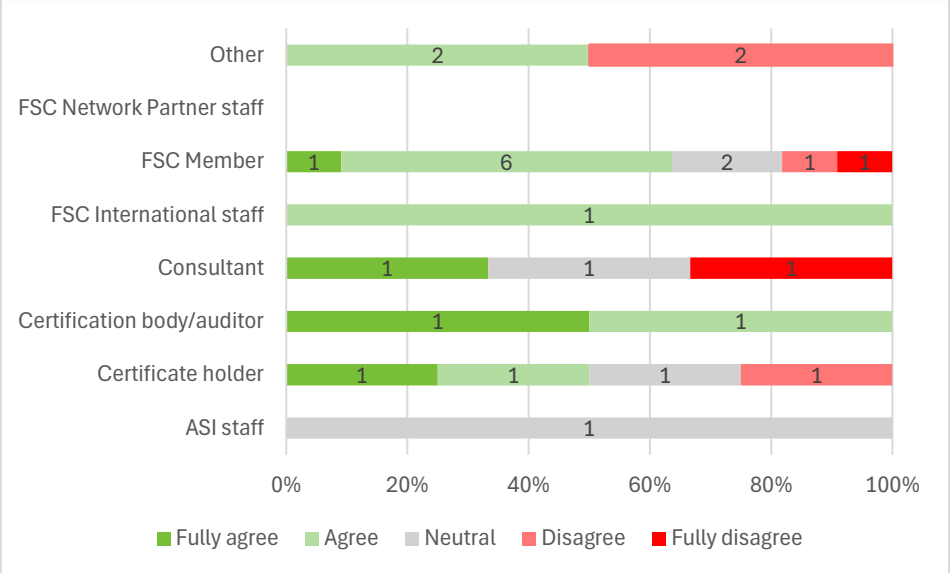

Figure 91 Agreement levels by stakeholder type for Clause 14: number of respondents

Differences across FSC membership chambers were also observed. Economic South and Social South respondents expressed predominantly positive assessments, while Economic North respondents expressed comparatively more mixed and critical views, including several disagreement responses. Environmental North respondents also showed mixed responses distributed across agreement, neutrality, and disagreement categories. Respondents identifying as non-members expressed generally positive

views overall, although some disagreement and neutral responses were also recorded. The distribution of responses by chamber is presented in Figure 92.

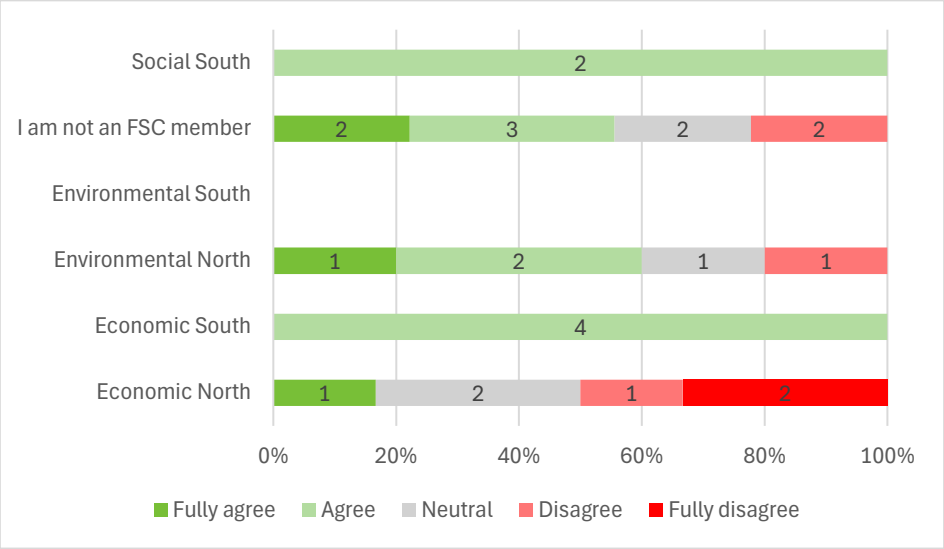

Figure 92 Agreement levels by FSC Membership Chambers for Clause 14: number of respondents

Q.69 Clarity, feasibility and auditability: How clear and practically feasible and auditable is this Clause, particularly regarding:

- the identification and use of undisturbed control areas
- the comparison between control and impacted areas
- the use of spatially replicated monitoring approaches
- assessing changes and recovery towards a reference state and the contribution of forest operations

Please select on a scale of 1 to 5. (5 Very clear/feasible and auditable; 1 Very unclear/not feasible or not auditable in practice)

A total of 24 participants responded to this question. Overall, 75% of respondents considered the proposed requirements to be at least moderately clear, feasible, and auditable in practice (moderately clear/feasible/auditable, clear/mostly feasible/auditable, and very clear/feasible/auditable combined). In contrast, 25% of respondents considered the requirements unclear, difficult to implement, or not feasible/auditable in practice (Figure 93).

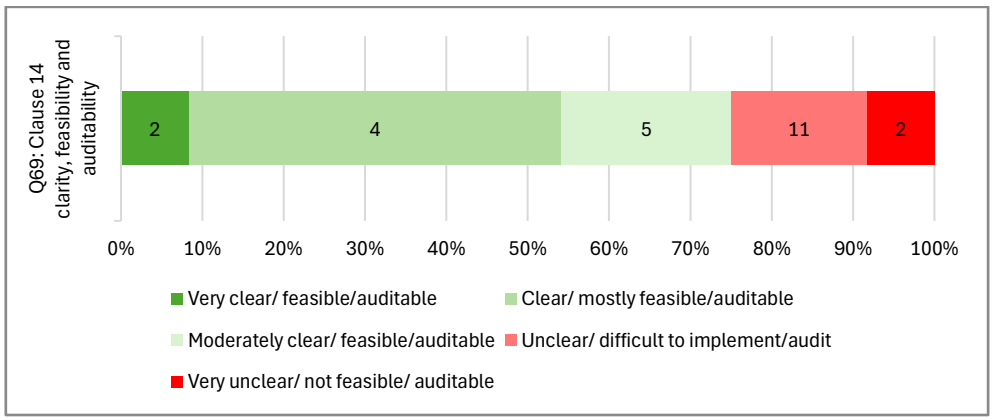

Figure 93 Feasibility and auditability levels by all respondents for Clause 14.

These results indicate overall positive assessments regarding the practical applicability of Clause 14, although a significant proportion of respondents continued to express concerns regarding feasibility, technical complexity, and implementation consistency across different ecological contexts.

Across stakeholder groups, FSC Members expressed predominantly moderate and positive assessments overall, although some respondents also considered the Clause difficult to implement or audit. Certification Bodies/auditors expressed positive assessments overall, while Consultants, FSC International staff members, ASI staff, and some Other stakeholder groups expressed comparatively more mixed or critical views. The distribution of responses by stakeholder type is presented in Figure 94.

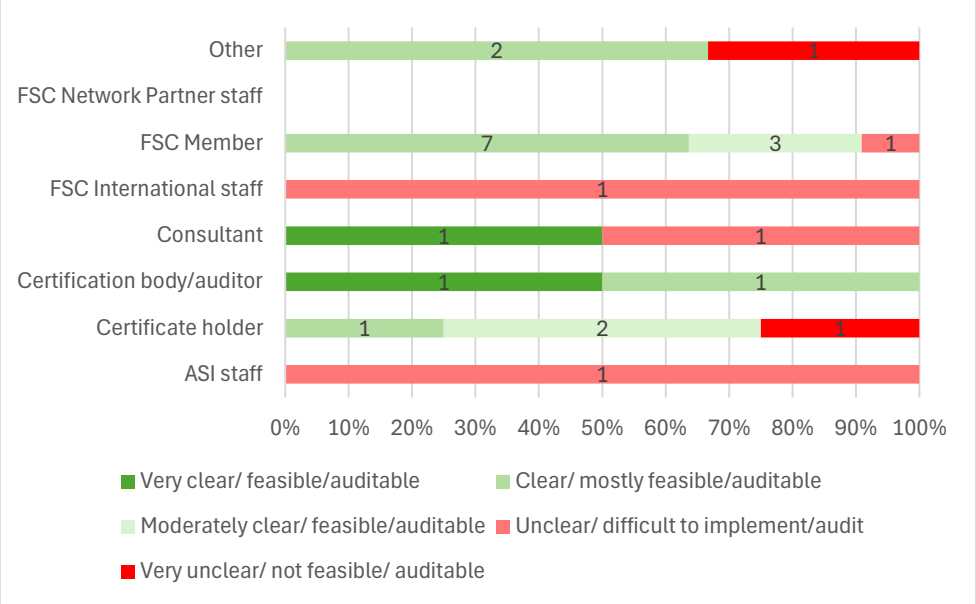

Figure 94 Feasibility and auditability levels by stakeholder type for Clause 14: number of respondents

Differences among FSC membership chambers were also observed. Economic South, Environmental North, and Social South respondents expressed predominantly positive assessments regarding clarity, feasibility, and auditability. In contrast, Economic North respondents expressed comparatively more critical views, including several responses indicating difficulty regarding implementation and auditability. Respondents identifying as non-members also expressed mixed views distributed across both positive and critical assessments. The distribution of responses by chamber is presented in Figure 95.

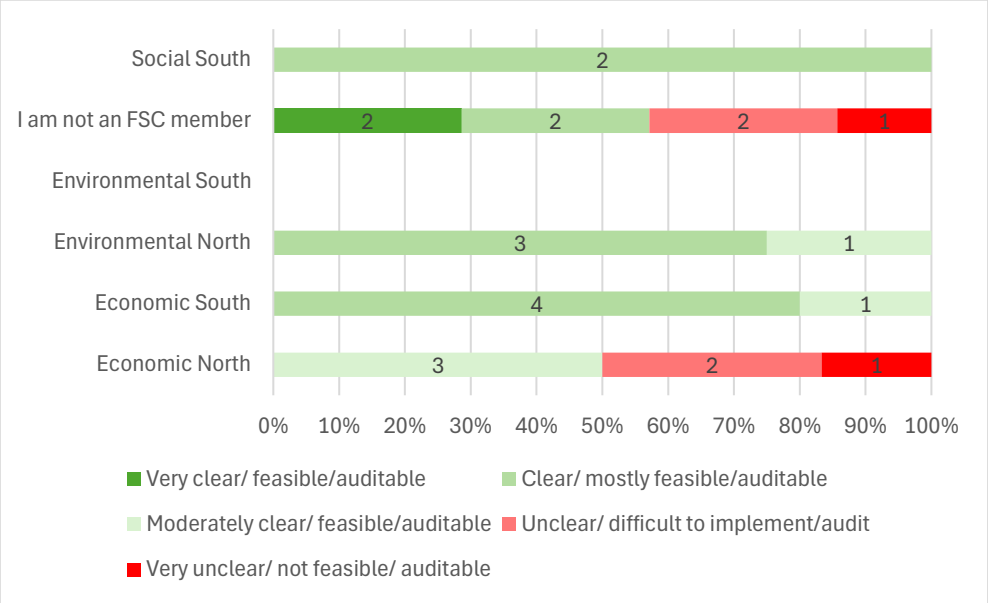

Figure 95 Feasibility and auditability levels by FSC Membership Chambers for Clause 14: number of respondents

Open feedback for Clause 14

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 14:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause introduces an excessively technical and scientifically demanding monitoring framework that may not be operationally realistic across FSC-certified contexts. Several comments also questioned whether comparative ecological monitoring approaches can be consistently and meaningfully applied across highly variable forest systems.

b) Practical implementation constraints: stakeholders identified challenges related to identifying ecologically comparable control areas, implementing replicated monitoring systems, collecting long-term data, and operationalizing scientifically robust comparative approaches. Concerns were also raised regarding costs, technical capacity, and feasibility in remote or data-poor contexts.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently verify scientifically complex monitoring systems in the absence of standardized methodologies and clear criteria for evaluating comparability between control and impacted areas, interpreting ecological recovery trajectories, and assessing adequacy of monitoring approaches.

d) Further clarification or definitions required: multiple comments requested clearer definitions and methodologies regarding “reference state,” “control areas,” ecological comparability, recovery trajectories, spatial replication approaches, and interpretation of monitoring results. Several respondents also requested clearer operational guidance and scalable methodologies.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised concerns regarding compatibility with national forest monitoring systems and differing regional ecological realities.

f) Elements to be revised or recommendations: key recommendations focused on simplifying and streamlining monitoring expectations, clarifying methodologies for selecting control areas and defining comparability, improving proportionality and feasibility, strengthening auditability and methodological consistency, ensuring greater contextual flexibility across ecological systems, and clarifying how comparative monitoring should inform adaptive management and operational decisions.

Table 15 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 15 Summary of key feedback from participants for Clause 14: Monitoring in undisturbed control areas vs areas under forest operations

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for scientifically robust monitoring approaches	Several respondents support the intention of using control areas, replicated spatial approaches, and comparative monitoring frameworks to improve scientific robustness and credibility of IFL monitoring. Positive comments recognize that comparative monitoring may strengthen ecological interpretation and adaptive management.	a, f	FSC appreciates the positive feedback on this Clause. The revised Advice Note retains the use of spatially replicated monitoring designs and reference states as key components of the monitoring methodology, while integrating them into the broader monitoring framework under Clause 11.
2	Need for clearer operational methodologies and monitoring guidance	A major recurring concern is that the Clause introduces highly technical monitoring concepts without sufficiently clear operational methodologies, implementation guidance, or minimum expectations. Respondents repeatedly request clearer protocols for selecting control areas, replication methods, and defining reference conditions.	d, f	The monitoring methodology has been simplified and integrated into Clause 11 of the revised Advice Note. The revised Clause clarifies that monitoring should use spatially replicated sampling designs, scientifically established methods, relevant monitoring timeframes, and reference states, while FSC has started developing guidance on monitoring to support consistent application.
3	Clause considered too complex, technical, or difficult to operationalize	Several respondents indicate that the monitoring approach proposed is excessively technical and difficult to apply consistently in operational forestry contexts. Concerns are raised regarding scientific complexity, availability of comparable control areas, and the feasibility of replicated spatial monitoring designs.	a, b, c, d	The revised Advice Note simplifies the monitoring framework by integrating this requirement into Clause 11, rather than maintaining it as a separate monitoring Clause. The monitoring section was also reduced from six Clauses in the consultation draft to three Clauses in the revised Advice Note, reducing complexity while maintaining the overall monitoring objectives.
4	Auditability and verification concerns	Respondents repeatedly question how certification bodies will consistently verify the adequacy of control areas, comparability between sites, replication approaches, and interpretation of monitoring results. Concerns are raised regarding methodological subjectivity and lack of standardized protocols.	c, d	The revised Clause provides a clearer framework for monitoring methodologies, including spatially replicated sampling designs and reference states. FSC has also started the development of additional implementation guidance to support consistent implementation and verification by certification bodies.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
5	Challenges regarding identification of comparable control areas	Several comments emphasize that finding ecologically comparable undisturbed control areas may be extremely difficult in practice, particularly in managed landscapes, fragmented forests, or regions with long histories of disturbance. Respondents question whether meaningful comparison can realistically be achieved.	b, d, f	The revised Advice Note retains the concept of undisturbed areas to define the reference state but integrates it within a broader monitoring methodology rather than as a standalone requirement. FSC has started developing guidance on monitoring, which can support Organizations in identifying appropriate reference areas across different ecological contexts.
6	Need for clearer definitions of reference state and comparison logic	Multiple respondents request clearer definitions and operational guidance regarding “reference state,” “control areas,” acceptable ecological comparability, and interpretation of recovery trajectories. Concerns are raised that organizations may apply inconsistent baselines or inappropriate comparisons.	d, f	The revised Advice Note continues to require comparison with a reference state using spatially replicated monitoring designs, while presenting these concepts within a broader monitoring methodology. The planned monitoring guidance referred in this document, can support consistent interpretation and application.
7	Need for proportionality and feasibility	Several comments stress that the proposed monitoring framework may become resource-intensive, costly, and difficult to implement, especially for organizations operating in remote tropical contexts or with limited scientific capacity. Respondents repeatedly request more proportionate and scalable approaches.	b, c, f	The revised Advice Note simplifies the monitoring framework while requiring monitoring approaches that are scalable and tailored to the identified risks to ecological integrity features and socio-cultural values. Further region-specific monitoring approaches will be considered during Phase 2 (V2-0).
8	Concerns regarding applicability across ecological contexts	Several respondents note that ecological comparability, recovery trajectories, and monitoring methodologies differ significantly across tropical, boreal, and disturbance-driven ecosystems, requiring greater contextual flexibility and regionally adapted approaches.	b, d, f	The revised Advice Note requires monitoring methodologies to be tailored to the ecological integrity features and socio-cultural values being monitored, allowing monitoring approaches to reflect different ecological contexts. Further regional adaptation of monitoring methodologies will be considered during Phase 2 (V2-0).

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
9	Need for stronger linkage to adaptive management and operational decision-making	Some comments indicate that the Clause does not sufficiently explain how comparative monitoring results should inform management decisions, operational changes, or adaptive management responses.	b, c, d	This concern has been addressed through the restructuring of the monitoring section. The revised Advice Note establishes a clearer link between monitoring and adaptive management by requiring Organizations to update and adapt their management plans based on the findings of monitoring activities and other relevant monitoring and evaluation initiatives.
10	Concerns regarding long-term ecological assumptions and variability	Several respondents highlight that ecological dynamics are highly variable and influenced by multiple external factors such as climate change, natural disturbance, and landscape-level processes, making direct comparison between impacted and control areas methodologically challenging.	a, b, c, d	The revised Advice Note continues to use reference states and comparative monitoring but recognizes that monitoring methodologies, monitoring timeframes, and reference states should be appropriate to the ecological integrity features and socio-cultural values being monitored, allowing greater flexibility across different ecological contexts.
11	General concerns regarding excessive complexity and scientific burden	Several respondents reiterate broader concerns that the Advice Note introduces overly scientific, highly technical, and operationally burdensome monitoring requirements that may exceed the realistic capacity of many certificate holders and certification bodies.	a, b, c, f	The Advice Note has been substantially revised to simplify its structure and reduce complexity. The monitoring section was consolidated from six Clauses in the consultation draft to three Clauses in the revised Advice Note, integrating the comparative monitoring requirements into a broader monitoring methodology while maintaining the scientific intent of the original proposal.

Clause 15: Monitor the state of critical landscape integrity features & socio-cultural values

Q.73 Agreement with Clause 15: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 29 participants. Overall, 62% of respondents expressed agreement with the content, clarity, and intent of Clause 15 (agree and fully agree combined), while 14% expressed disagreement (disagree and fully disagree combined). An additional 24% of respondents selected the neutral option. The results indicate generally positive support for Clause 15 among respondents. Agreement levels clearly exceeded disagreement levels, although the relatively high proportion of neutral responses suggests that some stakeholders remained uncertain regarding the operational implications and monitoring expectations associated with the Clause (Figure 96).

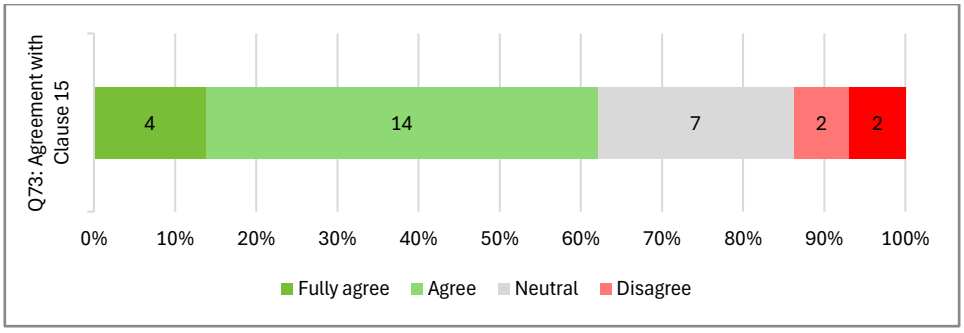

Figure 96 Agreement levels by all respondents for Clause 15

Across stakeholder groups, FSC Members expressed predominantly positive assessments overall, although some disagreement responses were also recorded. Certification Bodies/auditors, Certificate Holders, Consultants, FSC International staff members, and Other stakeholder groups also expressed mainly positive views. ASI staff responses were neutral overall. The distribution of responses by stakeholder type is presented in Figure 97.

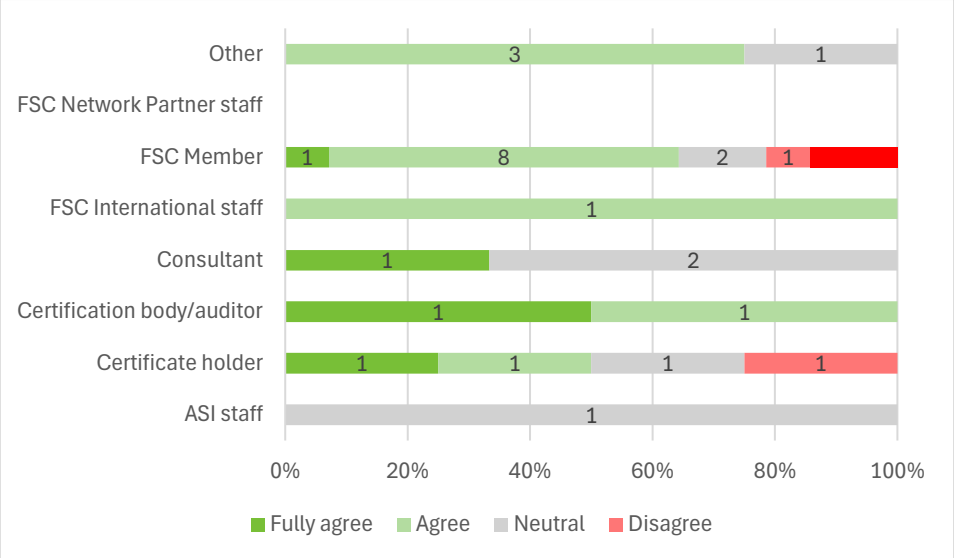

Figure 97 Agreement levels by stakeholder type for Clause 15: number of respondents

Differences across FSC membership chambers were also observed. Economic South, Social South, Environmental North, and non-member respondents expressed predominantly positive assessments regarding the Clause. Economic North respondents showed comparatively more mixed views, distributed

across agreement, neutrality, and disagreement categories. The distribution of responses by chamber is presented in Figure 98.

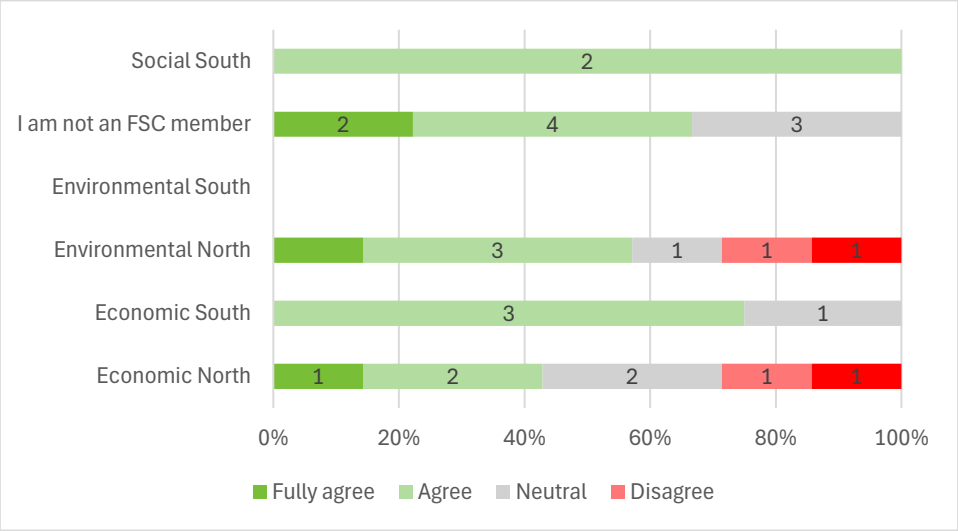

Figure 98 Agreement levels by FSC Membership Chambers for Clause 15: number of respondents

Q.74 Clarity and practical applicability: How clear and practically applicable is this Clause, particularly regarding:

- monitoring the state of critical landscape integrity features
- monitoring the state of socio-cultural values

Please select on a scale of 1 to 5. (5 Very clear and applicable; 1 Very unclear or not applicable in practice)

A total of 25 participants responded to this question. Overall, 84% of respondents considered the proposed requirements to be at least moderately clear and applicable in practice (moderately clear/applicable, clear/mostly applicable, and very clear/applicable combined). In contrast, 16% of respondents considered the requirements unclear or difficult to apply in practice (Figure 99).

These results indicate comparatively strong positive assessments regarding the practical applicability of Clause 15. Most respondents considered the proposed monitoring-related requirements sufficiently clear and operationally feasible, although some concerns regarding implementation complexity and methodological consistency remained.

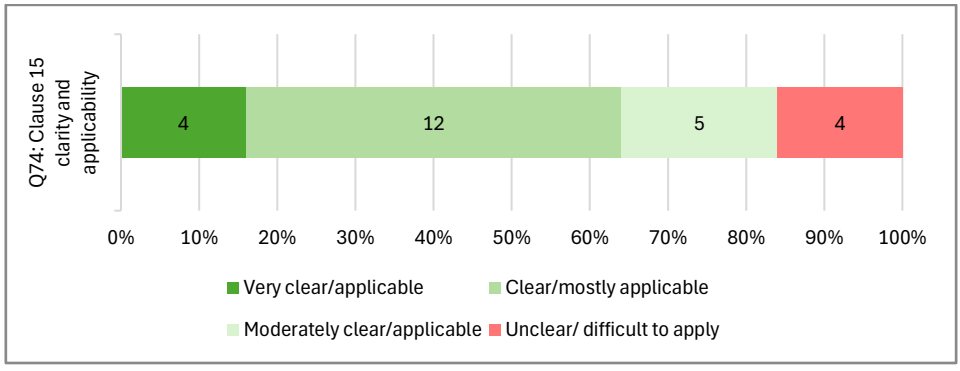

Figure 99 Clarity levels by all respondents for Clause 15.

Across stakeholder groups, FSC Members expressed predominantly positive assessments overall, although some respondents considered the Clause difficult to apply in practice. Certification Bodies/auditors, Certificate Holders, Consultants, FSC International staff members, and Other stakeholder groups also expressed mainly positive views. ASI staff responses were comparatively more critical. The distribution of responses by stakeholder type is presented in Figure 100.

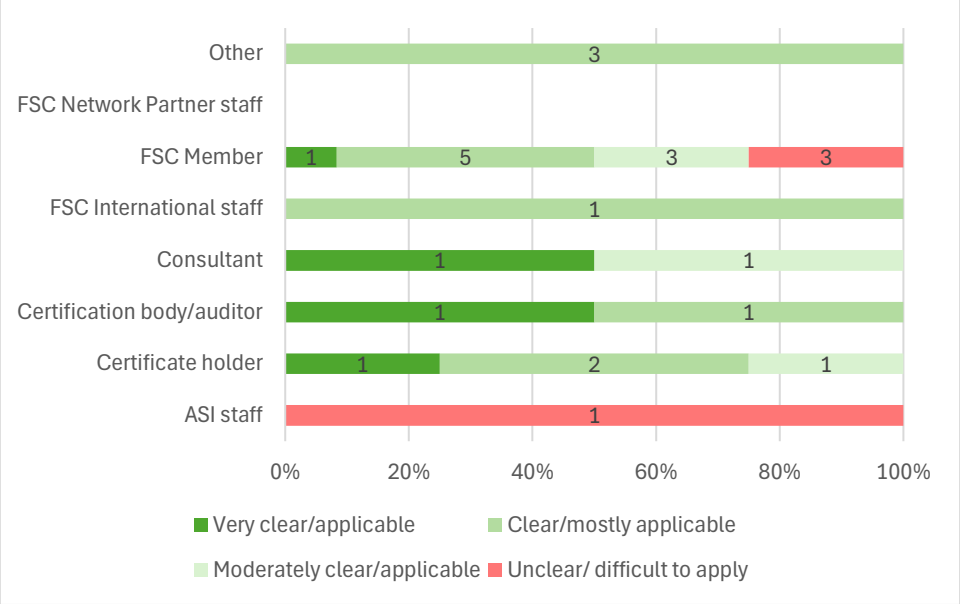

Figure 100 Clarity levels by stakeholder type for Clause 15: number of respondents

Differences among FSC membership chambers were also observed. Economic South, Social South, Environmental North, and non-member respondents expressed predominantly positive assessments regarding clarity and applicability. Economic North respondents expressed mainly moderate and positive views overall, while some Environmental North respondents expressed concerns regarding practical applicability. The distribution of responses by chamber is presented in Figure 101.

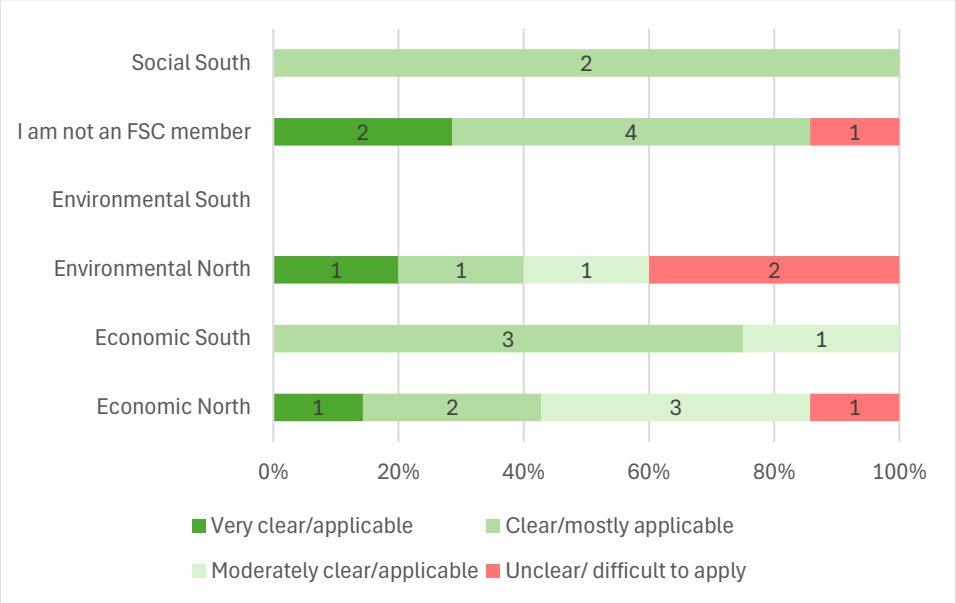

Figure 101 Clarity levels by FSC Membership Chambers for Clause 15: number of respondents

Open feedback for Clause 15

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 15:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause remains broad and insufficiently operationalized, lacking clear monitoring methodologies, measurable expectations, and concise implementation criteria.

b) Practical implementation constraints: stakeholders identified challenges related to conducting long-term ecological and socio-cultural monitoring, selecting appropriate indicators, adapting methodologies to diverse contexts, and managing the technical and financial burden associated with monitoring systems.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently assess monitoring adequacy across different contexts in the absence of standardized methodologies and clearly defined evidence expectations for monitoring critical landscape integrity features and socio-cultural values.

d) Further clarification or definitions required: multiple comments requested clearer definitions and operational guidance regarding “critical landscape integrity features,” “socio-cultural values,” monitoring methodologies, acceptable evidence requirements, and adaptive management expectations.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised concerns regarding differing regional capacities and monitoring realities across jurisdictions and forest systems.

f) Elements to be revised or recommendations: key recommendations focused on clarifying monitoring methodologies and evidence expectations, improving proportionality and contextual flexibility, strengthening guidance for socio-cultural monitoring approaches, improving linkage between monitoring and adaptive management, and reducing ambiguity and excessive process-oriented wording.

Table 16 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 16 Summary of key feedback from participants for Clause 15: Monitor the state of critical landscape integrity features & socio-cultural values

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for monitoring critical landscape integrity features and socio-cultural values	Several respondents support the inclusion of monitoring requirements focused on critical landscape integrity features and socio-cultural values. Positive comments recognize that ongoing monitoring is necessary to support adaptive management and long-term maintenance of ecological and socio-cultural conditions.	a, f	FSC appreciates the positive feedback on this Clause. The consulted Clause was removed as a standalone provision and its intent was incorporated into Clause 10 of the revised Advice Note, which establishes the requirements for monitoring ecological integrity features and socio-cultural values.
2	Need for clearer operational methodologies and monitoring expectations	A recurring concern is that the Clause does not sufficiently explain how organizations should monitor critical landscape integrity features and socio-cultural values, which Clauses should be used, or what constitutes adequate monitoring evidence.	d, f	This concern has been addressed through the restructuring of the monitoring framework. The revised Advice Note distinguishes between the monitoring parameters (Clause 10) and the monitoring methodologies (Clause 11), providing a clearer and more structured framework. The referred planned monitoring guidance can support consistent interpretation and application.to support consistent application.
3	Clause considered broad or insufficiently operationalized	Several respondents indicate that the Clause remains relatively generic and lacks sufficiently measurable implementation criteria, monitoring methodologies, or operational guidance. Concerns are raised regarding consistency of interpretation and practical implementation.	a, b, c, d	The consulted Clause was integrated into the revised monitoring framework. Clause 10 clarifies the monitoring parameters, while Clause 11 establishes the methodological requirements for monitoring. As mentioned, the planned monitoring guidance can support consistent interpretation and application.
4	Auditability and verification concerns	Respondents question how certification bodies will consistently verify monitoring quality, adequacy of selected Clauses, interpretation of socio-cultural monitoring information, and achievement of monitoring objectives across different contexts.	c, d	The revised Advice Note provides a clearer distinction between the monitoring parameters and the monitoring methodologies, thereby providing a more consistent basis for verification. Verification will continue to rely on established FSC certification processes, auditor competence, and documented implementation of the monitoring programme. The additional monitoring guidance can support consistent auditing.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
5	Need for clearer definitions and terminology	Several comments request clearer definitions and guidance regarding “critical landscape integrity features,” “socio-cultural values,” monitoring expectations, and acceptable methodologies or evidence requirements.	d, f	The concepts of ecological integrity features and socio-cultural values have been revised for greater clarity in the revised Advice Note. FSC is also developing additional guidance to facilitate consistent implementation and interpretation.
6	Need for proportionality and contextual flexibility	Some respondents stress that monitoring approaches should remain proportionate to organizational capacity, ecological risks, and the diversity of forest systems and socio-cultural contexts.	b, d, f	FSC recognizes the need for monitoring approaches that reflect different ecological and operational contexts. Further development of region-specific monitoring approaches will form part of Phase 2 (V2-0), while the revised Advice Note already provides a more streamlined monitoring framework.
7	Concerns regarding socio-cultural monitoring methodologies	Several comments highlight that socio-cultural values are highly context-dependent and may require culturally appropriate, participatory, and flexible monitoring approaches rather than standardized technical methodologies.	b, d, f	This concern has been addressed in the revised Advice Note. The monitoring requirements recognize the context-dependent nature of socio-cultural values and continue to incorporate culturally appropriate engagement and Traditional Ecological Knowledge (TEK) as part of the monitoring framework. Additional implementation guidance is being developed to support consistent application.
8	Need for stronger linkage between monitoring and adaptive management	Some respondents indicate that the Clause should more clearly explain how monitoring results are expected to inform management adjustments, corrective measures, or adaptive management responses.	b, c, d	This concern has been addressed through the restructuring of the monitoring section. The revised Advice Note introduces a dedicated Clause on adaptive management (Clause 12), requiring Organizations to update and adapt their management plans based on the findings of monitoring activities and other relevant monitoring and evaluation initiatives.
9	Concerns regarding implementation burden and resource requirements	Several comments note that long-term ecological and socio-cultural monitoring may become technically demanding and resource-intensive, especially where multiple requirements and participatory monitoring approaches are expected.	b, c, f	FSC recognizes these concerns. The monitoring framework has been substantially simplified through the consolidation of six monitoring Clauses into three Clauses in the revised Advice Note. FSC will continue to seek an appropriate balance between scientifically robust monitoring and practical, cost-effective implementation, while further context-specific approaches will be considered during Phase 2 (V2-0).

Clause 16: Monitor the state of species that inform about the ecological integrity in response to forest operations

Q.78 Agreement with Clause 16: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 28 participants. Overall, 64% of respondents expressed agreement with the content, clarity, and intent of Clause 16 (agree and fully agree combined), while 18% expressed disagreement (disagree and fully disagree combined). An additional 18% of respondents selected the neutral option. The results indicate generally positive support for Clause 16 among respondents. Agreement levels clearly exceeded disagreement levels, suggesting overall support for the proposed monitoring requirements related to bioindicator and keystone species, although some stakeholders expressed concerns regarding technical complexity and implementation feasibility (Figure 102).

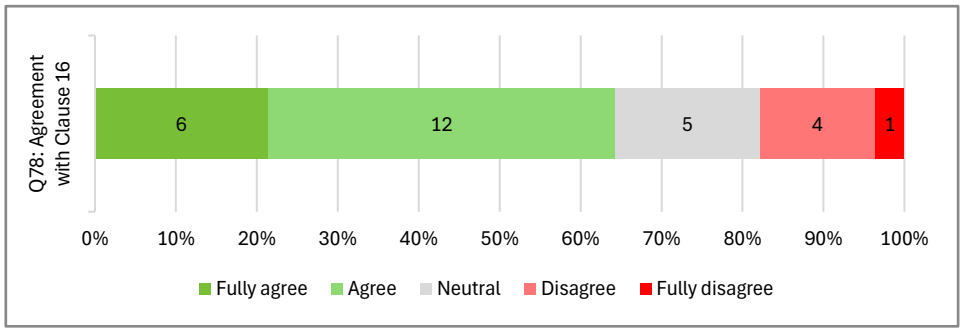

Figure 102 Agreement levels by all respondents for Clause 16

Across stakeholder groups, FSC Members expressed predominantly positive assessments overall, including several "fully agree" responses. Certification Bodies/auditors and some Other stakeholder groups also expressed mainly positive views. Certificate Holders and Consultants showed comparatively more mixed responses, while ASI staff and FSC International staff responses leaned toward neutrality or disagreement. The distribution of responses by stakeholder type is presented in Figure 103.

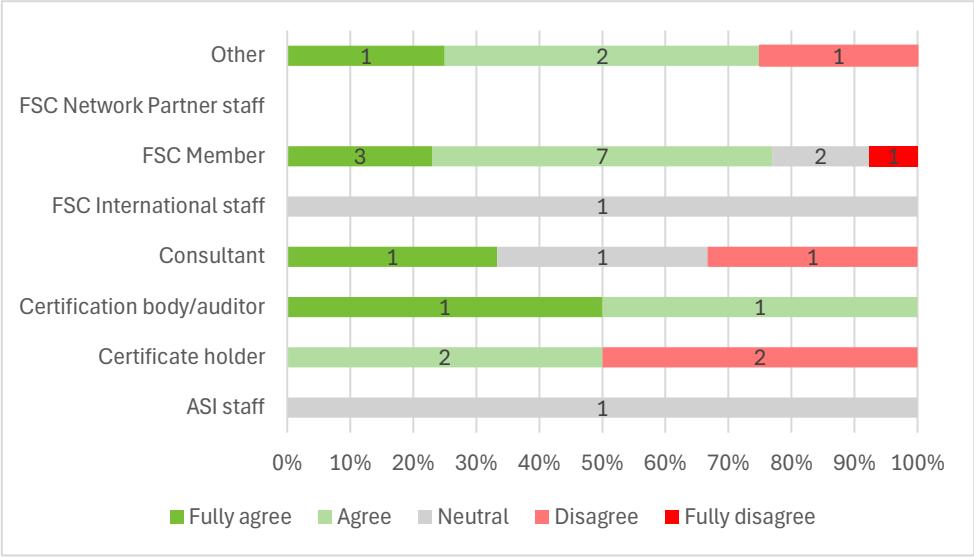

Figure 103 Agreement levels by stakeholder type for Clause 15: number of respondents

Differences across FSC membership chambers were also observed. Environmental North respondents expressed comparatively strong positive support overall, including several "fully agree" responses. Economic South and Social South respondents also expressed predominantly positive assessments. In contrast, Economic North respondents showed comparatively more mixed and critical views, including

disagreement responses. Respondents identifying as non-members expressed mainly positive views overall, although some neutrality and disagreement responses were also recorded. The distribution of responses by chamber is presented in Figure 104.

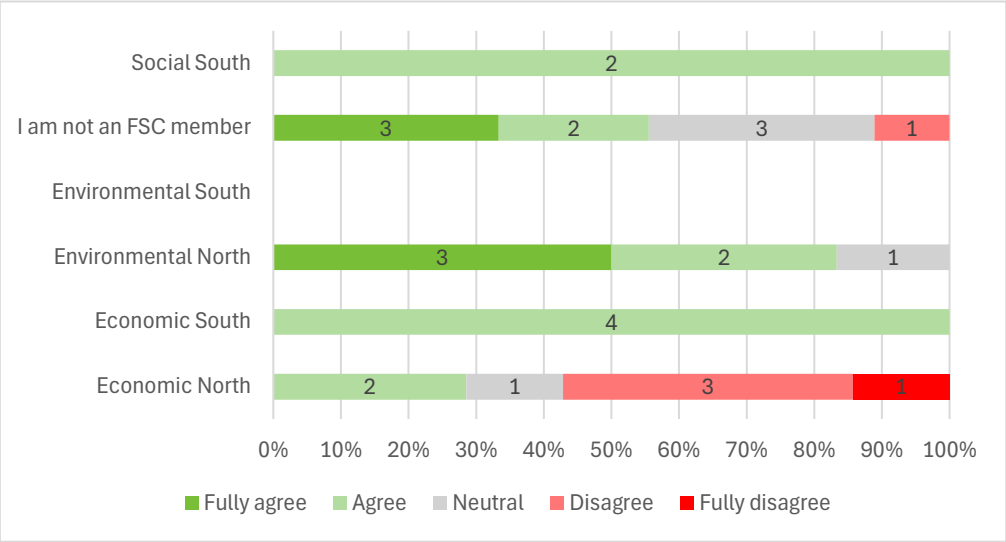

Figure 104 Agreement levels by FSC Membership Chambers for Clause 15: number of respondents

Q.79 Clarity, feasibility and auditability: How clear and practically feasible and auditable is this Clause, particularly regarding:

- the selection and monitoring of bioindicator and keystone species
- the use of multi-species indices where appropriate
- determining when such monitoring is required (i.e. when not already covered under critical landscape integrity features or cultural keystone species)

Please select on a scale of 1 to 5. (5 Very clear/feasible and auditable; 1 Very unclear/not feasible or not auditable in practice).

A total of 25 participants responded to this question. Overall, 76% of respondents considered the proposed requirements to be at least moderately clear, feasible, and auditable in practice (moderately clear/feasible/auditable, clear/mostly feasible/auditable, and very clear/feasible/auditable combined). In contrast, 24% of respondents considered the requirements unclear, difficult to implement, or not feasible/auditable in practice (Figure 105).

These results indicate generally positive assessments regarding the practical applicability of Clause 16, although a notable proportion of respondents continued to express concerns regarding technical complexity, ecological expertise requirements, and implementation consistency across contexts.

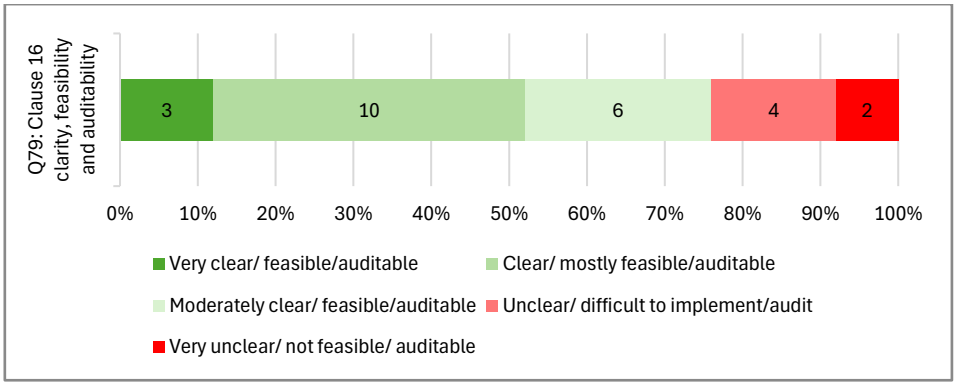

Figure 105 Feasibility and auditability levels by all respondents for Clause 16

Across stakeholder groups, FSC Members expressed predominantly moderate and positive assessments overall, although some respondents considered the Clause difficult to implement or audit. Certification Bodies/auditors and some Other stakeholder groups expressed mainly positive assessments, while ASI staff, FSC International staff members, and some Consultants expressed comparatively more critical views. Certificate Holders expressed generally positive assessments overall despite some implementation concerns. The distribution of responses by stakeholder type is presented in Figure 106.

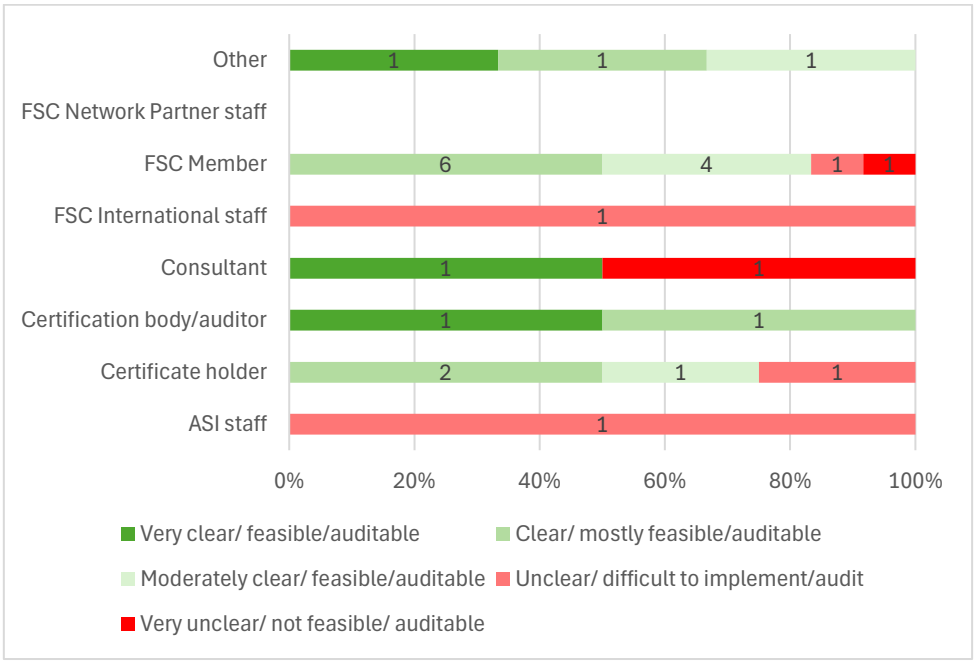

Figure 106 Feasibility and auditability levels by stakeholder type for Clause 16: number of respondents

Differences among FSC membership chambers were also observed. Economic South and Environmental North respondents expressed predominantly positive assessments regarding clarity, feasibility, and auditability. Economic North respondents showed comparatively more critical views, including several responses indicating that the Clause may be unclear or difficult to implement. Respondents identifying as non-members expressed mixed but generally positive views overall. The distribution of responses by chamber is presented in Figure 107.

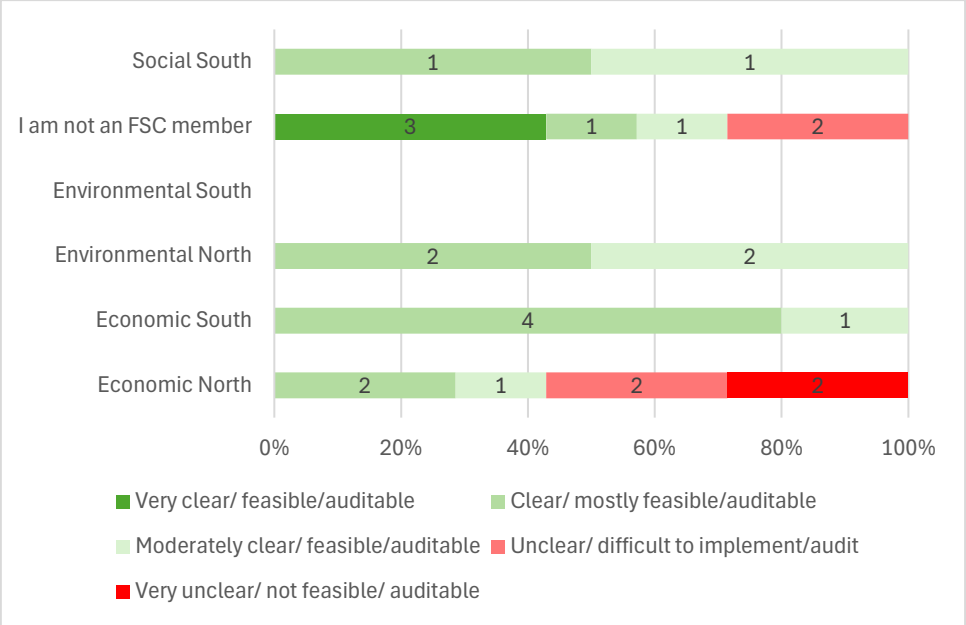

Figure 107 Feasibility and auditability levels by FSC Membership Chambers for Clause 16: number of respondents

Open feedback for Clause 16

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 16:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause introduces technically complex monitoring expectations that may be difficult to operationalize consistently across different forest systems and organizational capacities. Several comments also questioned potential overlap with existing ecological monitoring requirements.

b) Practical implementation constraints: stakeholders identified challenges related to selecting appropriate species and indicators, obtaining specialized ecological expertise, collecting long-term species data, and adapting monitoring approaches to different forest systems and biodiversity contexts.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently assess species selection, adequacy of monitoring approaches, interpretation of ecological results, and justification for the use of particular bioindicator or keystone species in the absence of standardized methodologies and clearly defined criteria.

d) Further clarification or definitions required: multiple comments requested clearer definitions and operational guidance regarding “bioindicator species,” “keystone species,” “multi-species indices,” triggers for monitoring requirements, and acceptable methodologies for ecological interpretation and implementation.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised concerns regarding differing regional biodiversity frameworks, ecological monitoring systems, and technical capacities across jurisdictions.

f) Elements to be revised or recommendations: key recommendations focused on clarifying methodologies and species selection criteria, improving contextual flexibility and scalability, reducing overlap with existing monitoring requirements, strengthening linkage between species monitoring and adaptive management, improving proportionality and feasibility, and reducing excessive scientific and process-oriented complexity.

Table 17 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 17 Summary of key feedback from participants for Clause 16: Monitor the state of species that inform about the ecological integrity in response to forest operations

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for the use of bioindicator and keystone species	Several respondents support the inclusion of bioindicator species, keystone species, and multi-species indices as tools to strengthen ecological monitoring and assessment of IFL integrity. Positive comments recognize the scientific relevance and practical utility of proxy species approaches.	a, f	FSC appreciates the positive feedback on the intent of this Clause. The consulted Clause was removed as a standalone provision. The revised Advice Note adopts a more flexible monitoring approach that allows Organizations to select scientifically appropriate monitoring methodologies according to the ecological integrity features and socio-cultural values being monitored.
2	Need for clearer operational criteria for species selection and monitoring	A major recurring concern is that the Clause does not sufficiently explain how organizations should select bioindicator or keystone species, determine when monitoring is required, or apply multi-species indices consistently across contexts.	d, f	The consulted Clause was removed from the revised Advice Note. Rather than prescribing the use of bioindicator species, keystone species or multi-species indices, the revised monitoring framework requires Organizations to establish scientifically appropriate monitoring methodologies suited to the identified ecological integrity features and socio-cultural values. FSC has started to develop a monitoring guidance to support consistent application.
3	Clause considered technically complex or difficult to operationalize	Several respondents indicate that the Clause introduces scientifically complex monitoring expectations that may be difficult to implement consistently, particularly where ecological data, expertise, or species-specific knowledge are limited.	a, b, c, d	The removal of this standalone Clause forms part of the broader simplification of the monitoring framework. Rather than prescribing technically specific monitoring approaches, the revised Advice Note allows Organizations greater flexibility to select monitoring methodologies appropriate to their ecological and operational context.
4	Auditability and verification concerns	Respondents repeatedly question how certification bodies will consistently verify species selection methodologies, adequacy of monitoring approaches, ecological interpretation of monitoring results, and justification for using particular species or indices.	c, d	The revised Advice Note no longer requires verification of the selection or application of specific bioindicator species, keystone species or multi-species indices. Instead, verification focuses on whether the Organization has established scientifically appropriate monitoring methodologies capable of assessing the identified ecological integrity features and socio-cultural values.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
5	Need for clearer definitions and terminology	Several comments request clearer definitions and operational guidance regarding “bioindicator species,” “keystone species,” “multi-species indices,” and criteria for determining when additional species monitoring is necessary.	d, f	The removal of this standalone Clause also removes the need to define concepts such as bioindicator species, keystone species and multi-species indices within the Advice Note. The revised monitoring framework instead focuses on scientifically established monitoring methodologies appropriate to the identified ecological integrity features and socio-cultural values.
6	Need for contextual flexibility across ecological systems	Respondents emphasize that ecological Clauses, keystone species, and monitoring approaches differ significantly across forest types, disturbance regimes, and geographic regions, requiring greater contextual flexibility and regionally adapted approaches.	b, d, f	This concern has been addressed through the revised monitoring framework, which allows Organizations to select monitoring methodologies appropriate to their ecological context rather than prescribing specific monitoring indicators. Further regional adaptation of monitoring approaches will be considered during Phase 2 (V2-0).
7	Concerns regarding feasibility and technical capacity	Several comments highlight that species monitoring may require specialized expertise, significant field effort, and long-term ecological datasets that may not be available in all contexts, particularly for smaller organizations or remote forest operations.	b, c, f	The removal of the prescriptive species-monitoring requirement reduces the technical burden associated with implementing this Clause. The revised Advice Note provides Organizations with greater flexibility to select monitoring methodologies that are scientifically appropriate and proportionate to their operational context.
8	Need for stronger linkage between species monitoring and management decisions	Some respondents indicate that the Clause should more clearly explain how species monitoring results are expected to inform adaptive management, operational adjustments, or ecological decision-making processes.	b, c, d	The revised Advice Note no longer establishes a separate species-monitoring requirement. Instead, monitoring results are integrated into the broader adaptive management framework established under Clause 12, requiring Organizations to update and adapt their management plans based on monitoring findings and other relevant monitoring and evaluation initiatives.
9	Concerns regarding overlap with other monitoring requirements	Several comments question whether species monitoring requirements may duplicate or overlap with monitoring already required under critical	a, d, f	This concern has been addressed through the restructuring of the monitoring framework. The standalone species-monitoring Clause was removed, avoiding potential duplication with the broader monitoring requirements for ecological integrity

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
		landscape integrity features or other ecological monitoring Clauses.		features and socio-cultural values established under Clauses 10 and 11.
10	Need for proportionality and scalability	Some respondents stress that species monitoring expectations should remain proportionate to ecological risks, organizational capacity, and availability of existing monitoring systems or regional biodiversity frameworks.	b, d, f	The revised Advice Note adopts a more flexible and outcome-oriented monitoring framework, allowing Organizations to select monitoring methodologies that are proportionate to the identified risks, ecological context and available technical capacity. Further region-specific approaches will be considered during Phase 2 (V2-0).

Clause 17: Monitor the state of tree cover across the management unit (MU) and others

Q.83 Agreement with Clause 17: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 26 participants. Overall, 81% of respondents expressed agreement with the content, clarity, and intent of Clause 17 (agree and fully agree combined), while 8% expressed disagreement (disagree and fully disagree combined). An additional 12% of respondents selected the neutral option (Figure 108).

The results indicate very strong overall support for Clause 17 among respondents. Compared to previous clauses, this Clause received one of the highest levels of agreement and one of the lowest levels of disagreement, suggesting broad stakeholder support for the proposed monitoring approaches related to disturbance, recovery, connectivity, and socio-cultural mobility.

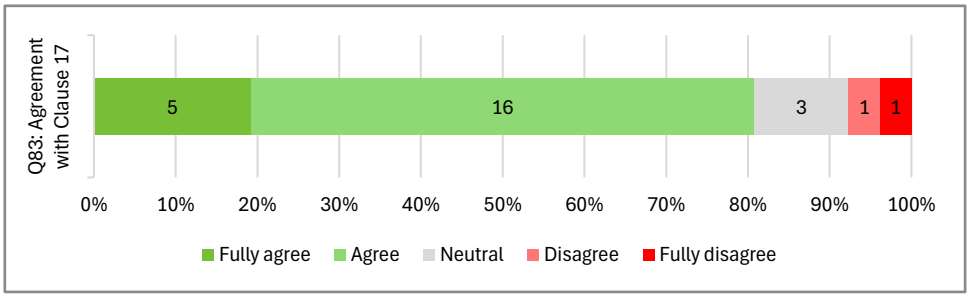

Figure 108 Agreement levels by all respondents for Clause 17

Across stakeholder groups, FSC Members expressed predominantly positive assessments overall, including several “agree” and “fully agree” responses. Certification Bodies/auditors, Certificate Holders, and Other stakeholder groups also expressed mainly positive views. Consultants expressed comparatively more mixed responses, while ASI staff and FSC International staff responses leaned toward neutrality or uncertainty. The distribution of responses by stakeholder type is presented in Figure 109.

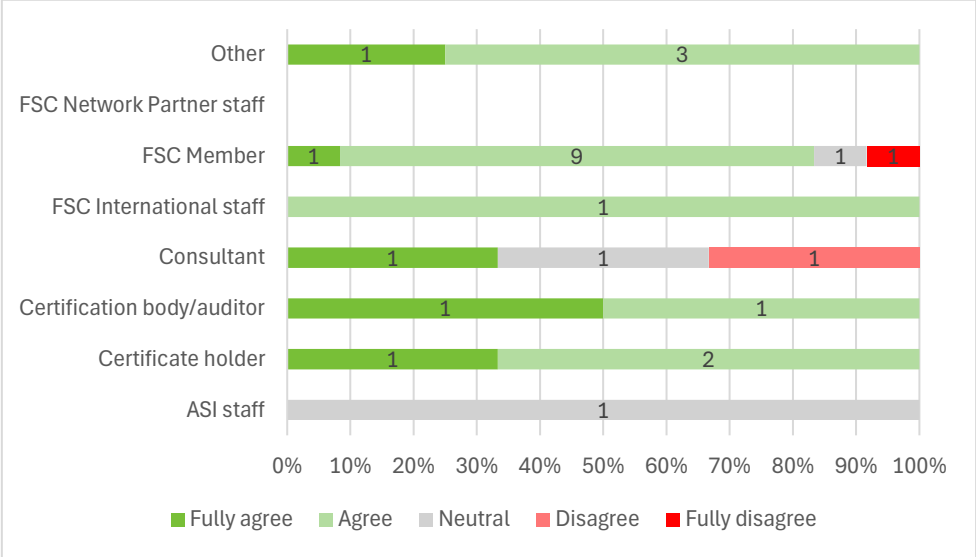

Figure 109 Agreement levels by stakeholder type for Clause 17: number of respondents

Differences across FSC membership chambers were also observed. Economic South, Environmental North, Social South, and non-member respondents expressed predominantly positive assessments regarding the Clause. Economic North respondents expressed comparatively more mixed views, including some disagreement responses. The distribution of responses by chamber is presented in Figure 110.

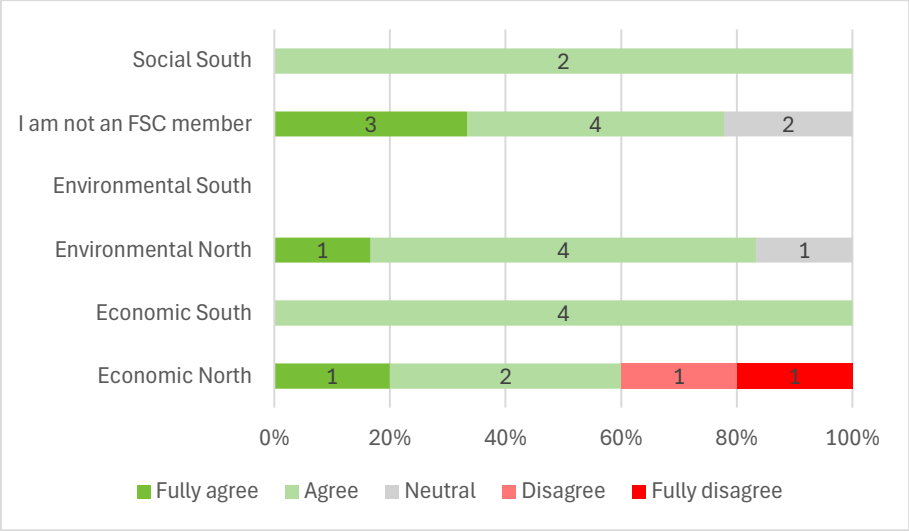

Figure 110 Agreement levels by FSC Membership Chambers for Clause 17: number of respondents

Q.84 Clarity, feasibility and auditability: How clear and practically feasible and auditable is this Clause, particularly regarding:

- monitoring the spatial extent of disturbances
- assessing natural regeneration and recovery
- evaluating forest connectivity
- monitoring changes in access and mobility of Indigenous Peoples and/or traditional peoples)

Please select on a scale of 1 to 5. (5 Very clear/feasible and auditable; 1 Very unclear/not feasible or not auditable in practice).

A total of 23 participants responded to this question. Overall, 87% of respondents considered the proposed requirements to be at least moderately clear, feasible, and auditable in practice (moderately clear/feasible/auditable, clear/mostly feasible/auditable, and very clear/feasible/auditable combined). In contrast, 13% of respondents considered the requirements unclear, difficult to implement, or not feasible/auditable in practice (Figure 111).

These results indicate very positive assessments regarding the practical applicability of Clause 17. Most respondents considered the proposed monitoring requirements sufficiently clear and operationally feasible, although some concerns regarding technical complexity and implementation consistency across contexts remained.

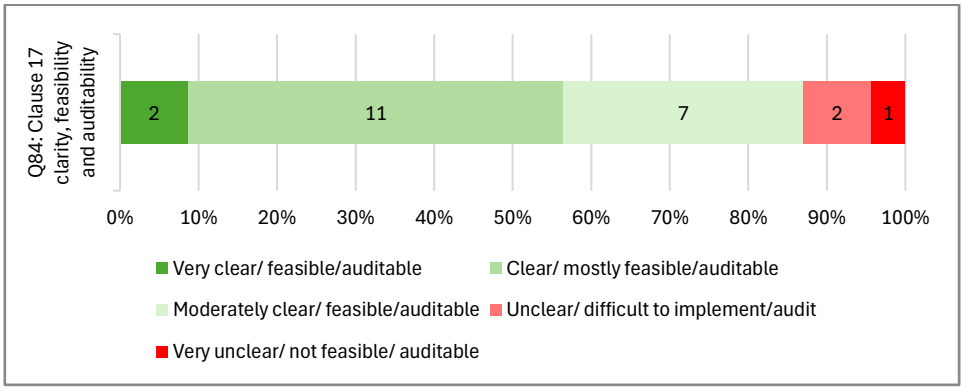

Figure 111 Feasibility and auditability levels by all respondents for Clause 17

Across stakeholder groups, FSC Members expressed predominantly moderate and positive assessments overall, while Certification Bodies/auditors, Certificate Holders, and Other stakeholder groups also expressed mainly positive views. Consultants and ASI staff expressed comparatively more mixed or critical assessments, while FSC International staff responses remained moderate overall. The distribution of responses by stakeholder type is presented in Figure 112.

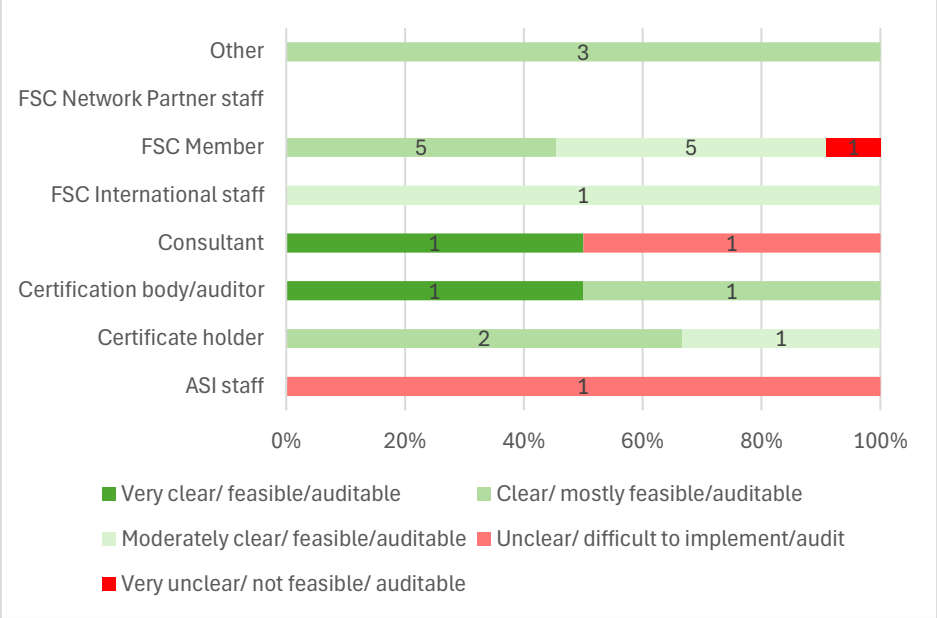

Figure 112 Feasibility and auditability levels by stakeholder type for Clause 17: number of respondents

Differences among FSC membership chambers were also observed. Economic South, Environmental North, Social South, and non-member respondents expressed predominantly positive assessments regarding clarity, feasibility, and auditability. Economic North respondents expressed comparatively more mixed responses, including several responses indicating implementation difficulty or auditability concerns. The distribution of responses by chamber is presented in Figure 113.

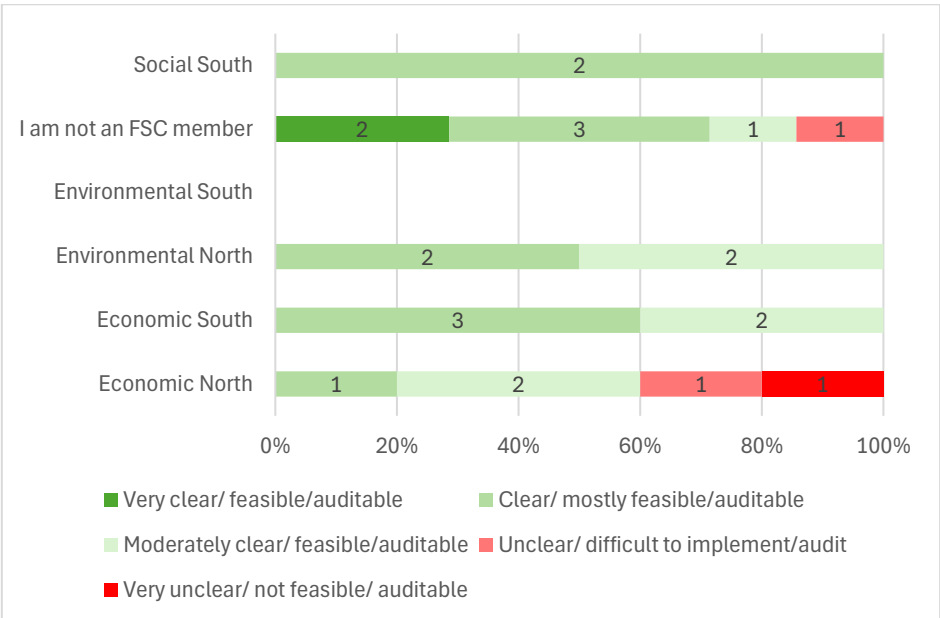

Figure 113 Feasibility and auditability levels by FSC Membership Chambers for Clause 17: number of respondents

Open feedback for Clause 17

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 17:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause combines several scientifically and operationally complex monitoring dimensions without sufficiently clear implementation criteria or measurable expectations.

b) Practical implementation constraints: stakeholders identified challenges related to monitoring connectivity, ecological recovery, disturbance extent, and socio-cultural mobility across large and diverse forest landscapes. Concerns were also raised regarding technical capacity, proportionality, and feasibility of long-term monitoring systems.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently verify connectivity, recovery, disturbance dynamics, and socio-cultural mobility changes in the absence of standardized methodologies and clearly defined criteria.

d) Further clarification or definitions required: multiple comments requested clearer definitions and operational guidance regarding “forest connectivity,” “recovery,” “disturbance extent,” acceptable monitoring methodologies, and socio-cultural monitoring expectations.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised concerns regarding differing regional governance systems, socio-cultural contexts, and ecological monitoring capacities across jurisdictions.

f) Elements to be revised or recommendations: key recommendations focused on clarifying methodologies and monitoring expectations, improving contextual flexibility across ecological and socio-cultural systems, strengthening linkage between monitoring and adaptive management, improving feasibility and proportionality, clarifying socio-cultural monitoring approaches, and reducing excessive technical and process-oriented complexity.

Table 18 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 18 Summary of key feedback from participants for Clause 17: Monitor the state of tree cover across the management unit (MU) and others

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for monitoring disturbance, recovery, and connectivity	Several respondents support the inclusion of monitoring requirements related to disturbance extent, natural regeneration, recovery, forest connectivity, and changes in access and mobility for Indigenous Peoples and traditional communities. Positive comments recognize the relevance and practicality of these monitoring elements.	a, f	FSC appreciates the positive feedback on this Clause. For simplification, the consulted Clause was removed as a standalone provision and its core monitoring elements were incorporated into Clause 10 of the revised Advice Note as part of the broader monitoring of ecological integrity features and socio-cultural values.
2	Need for clearer operational methodologies and monitoring expectations	A recurring concern is that the Clause does not sufficiently explain how organizations should assess connectivity, recovery, disturbance extent, or mobility changes, nor what methodologies or evidence are expected. Respondents request clearer operational guidance and standardized approaches.	d, f	This concern has been addressed through the restructuring of the monitoring framework. The revised Advice Note distinguishes between the monitoring parameters (Clause 10) and the monitoring methodologies (Clause 11), providing a clearer and more structured framework. FSC has started to develop a monitoring guidance to support consistent application.
3	Clause considered broad or difficult to operationalize consistently	Several respondents indicate that the Clause combines multiple complex monitoring dimensions without sufficiently measurable implementation criteria or operational specificity. Concerns are raised regarding consistency across different ecological and socio-cultural contexts.	a, b, c, d	The consulted Clause was integrated into the revised monitoring framework. Rather than maintaining separate monitoring requirements for different parameters, the revised Advice Note establishes a more streamlined and integrated approach to monitoring ecological integrity features and socio-cultural values.
4	Auditability and verification concerns	Respondents repeatedly question how certification bodies will consistently verify connectivity assessments, recovery monitoring, and evaluation of changes in access or mobility of Indigenous Peoples and traditional communities. Concerns are raised regarding subjectivity and lack of standardized methodologies.	c, d	The revised Advice Note provides a clearer distinction between the monitoring parameters and the monitoring methodologies, providing a more consistent basis for verification. Verification will continue to rely on established FSC certification processes, auditor competence, and documented implementation of the monitoring programme. FSC has started to develop a monitoring guidance which can support consistent auditing.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
5	Need for clearer definitions of connectivity and recovery concepts	Several comments request clearer definitions and operational guidance regarding “forest connectivity,” “recovery,” “disturbance extent,” and acceptable monitoring methodologies or thresholds. Respondents note that these concepts remain scientifically and operationally ambiguous.	d, f	The revised Advice Note simplifies the monitoring framework by integrating these concepts into the broader monitoring of ecological integrity features. FSC has started to develop a monitoring guidance which is expected to facilitate consistent implementation and interpretation.
6	Concerns regarding ecological and methodological complexity of connectivity monitoring	Some respondents highlight that assessing functional connectivity and ecological connectivity dynamics may be scientifically complex and difficult to validate consistently, particularly across large landscapes or different ecosystem types.	b, c, d	The revised Advice Note no longer establishes a separate requirement for monitoring connectivity. Instead, Organizations are required to establish monitoring methodologies appropriate to the ecological integrity features being monitored, providing greater flexibility while maintaining scientifically robust monitoring approaches.
7	Need for contextual flexibility across ecological systems and governance contexts	Respondents emphasize that connectivity dynamics, disturbance regimes, recovery trajectories, and socio-cultural mobility patterns vary significantly across forest systems and regions, requiring greater contextual flexibility and regionally adapted approaches.	b, d, f	FSC recognizes the need for monitoring approaches that reflect different ecological and socio-cultural contexts. Further development of region-specific monitoring approaches will form part of Phase 2 (V2-0), while the revised Advice Note already provides a more streamlined monitoring framework.
8	Need for stronger linkage between monitoring and adaptive management	Several comments indicate that the Clause should more clearly explain how monitoring results related to connectivity, disturbance, and recovery are expected to inform management decisions and adaptive management responses.	b, c, d	This concern has been addressed through the restructuring of the monitoring section. The revised Advice Note introduces a dedicated Clause on adaptive management (Clause 12), requiring Organizations to update and adapt their management plans based on the findings of monitoring activities and other relevant monitoring and evaluation initiatives.
9	Concerns regarding implementation feasibility and resource requirements	Some respondents note that large-scale monitoring of disturbance, recovery, connectivity, and socio-cultural mobility may become technically demanding and resource-intensive, particularly in remote or highly dynamic landscapes.	b, c, f	FSC recognizes these concerns. The monitoring framework has been substantially simplified through the consolidation of six monitoring Clauses into three Clauses in the revised Advice Note. FSC will continue to seek an appropriate balance between scientifically robust monitoring and practical, cost-effective

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
				implementation, while further context-specific approaches will be considered during Phase 2 (V2-0).
10	Need for clearer socio-cultural monitoring approaches	Several comments indicate that monitoring changes in access and mobility of Indigenous Peoples and traditional communities requires culturally appropriate and context-sensitive approaches that are not yet sufficiently operationalized in the Clause.	b, d, f	This concern has been addressed in the revised Advice Note. The monitoring requirements continue to incorporate culturally appropriate engagement and Traditional Ecological Knowledge (TEK), while recognizing that socio-cultural values are context-dependent. FSC has started to develop guidance on sociocultural values to support consistent implementation.
11	General concerns regarding excessive process-oriented and technical complexity	Some respondents reiterate broader concerns that the Advice Note introduces highly technical and process-heavy monitoring requirements that may increase implementation complexity and reduce consistency across FSC-certified operations.	a, c, f	The Advice Note has been substantially revised to simplify its structure. The monitoring section was consolidated from six Clauses in the consultation draft to three Clauses in the revised Advice Note, reducing duplication and complexity while maintaining the overall objectives of the monitoring framework.

Clause 18: Management plan documentation is adapted to reflect the insights gained from monitoring activities and others

Q.88 Agreement with Clause 18: Do you agree with the content, clarity, and intent of this Clause? Please select on a scale of 1 to 5. (5 fully agree; 1 fully disagree).

This question was answered by 31 participants. Overall, 68% of respondents expressed agreement with the content, clarity, and intent of Clause 18 (agree and fully agree combined), while 16% expressed disagreement (disagree and fully disagree combined). An additional 16% of respondents selected the neutral option (Figure 114).

The results indicate generally positive stakeholder support for Clause 18. Most respondents considered the proposed requirements for integrating monitoring results into adaptive management and long-term maintenance approaches to be appropriate in principle. However, a notable proportion of neutral and disagreement responses suggests that some stakeholders continue to have concerns regarding operational clarity, proportionality, and implementation expectations.

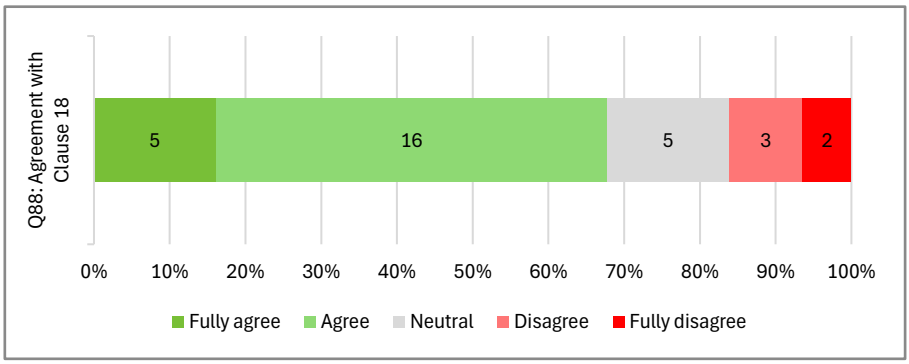

Figure 114 Agreement levels by all respondents for Clause 18

Across stakeholder groups, FSC Members expressed predominantly positive assessments overall, although some disagreement responses were also observed within this group. Certificate Holders, Certification Bodies/auditors, FSC International staff, and Other stakeholder groups expressed mainly positive views. Consultants expressed comparatively more mixed responses, while ASI staff responses remained neutral overall. The distribution of responses by stakeholder type is presented in Figure 115.

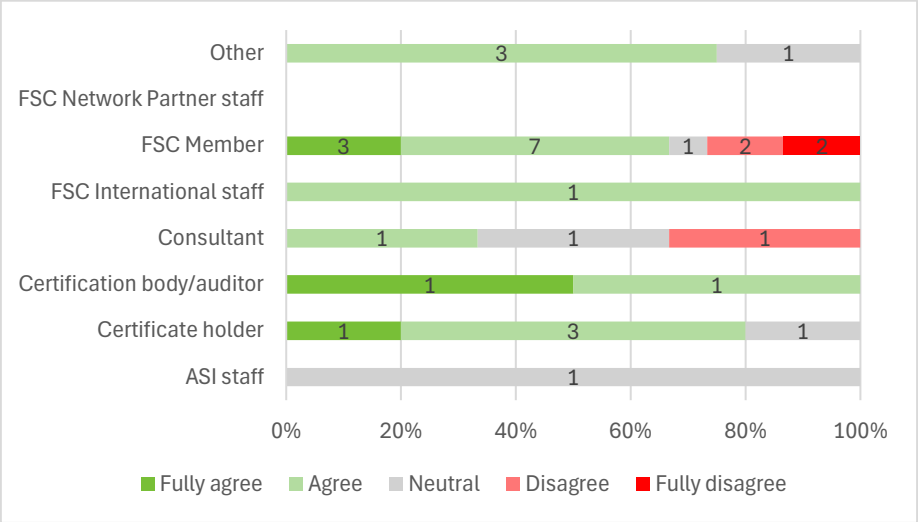

Figure 115 Agreement levels by stakeholder type for Clause 18: number of respondents

Differences across FSC membership chambers were also observed. Economic South, Social South, and non-member respondents expressed predominantly positive assessments regarding the Clause. Environmental North and Economic North respondents expressed comparatively more mixed views, including some disagreement responses. The distribution of responses by chamber is presented in Figure 116.

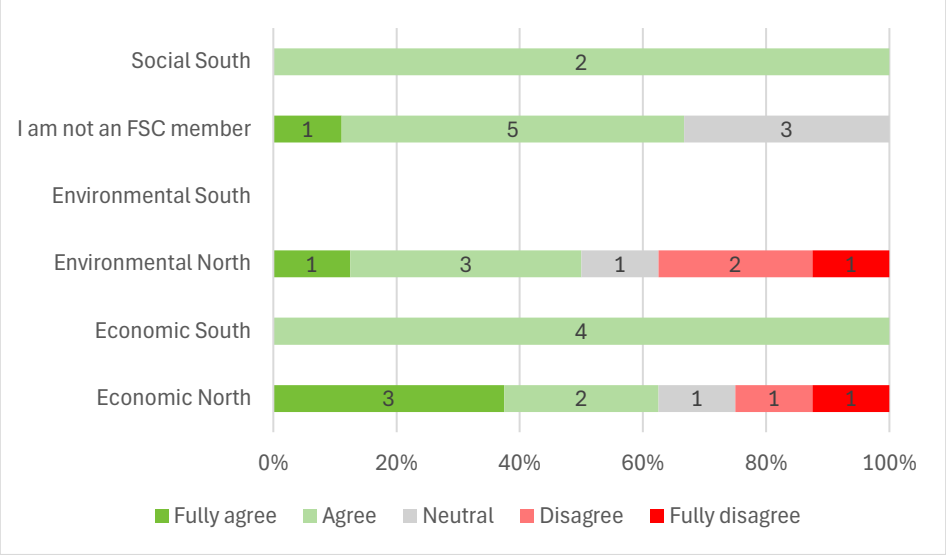

Figure 116 Agreement levels by FSC Membership Chambers for Clause 18: number of respondents

Q.89 Feasibility and auditability: To what extent is this Clause feasible to implement and auditable in practice, particularly regarding:

- integrating monitoring results into management plan documentation
- adapting management based on monitoring insights
- ensuring long-term maintenance of critical landscape integrity features and socio-cultural values

Please select on a scale of 1 to 5. (5 Very feasible and auditable; 1 Not feasible or not auditable in practice).

A total of 25 participants responded to this question. Overall, 72% of respondents considered the proposed requirements to be at least moderately clear, feasible, and auditable in practice (moderately clear/feasible/auditable, clear/mostly feasible/auditable, and very clear/feasible/auditable combined). In contrast, 28% of respondents considered the requirements unclear, difficult to implement, or not feasible/auditable in practice (Figure 117).

These results indicate generally positive perceptions regarding the feasibility and auditability of Clause 18, although concerns remain regarding the operationalization of adaptive management approaches and the demonstration of long-term maintenance outcomes. Compared to some earlier monitoring-related clauses, responses suggest somewhat greater confidence in the practical applicability of the requirements, while still highlighting the need for clearer implementation expectations.

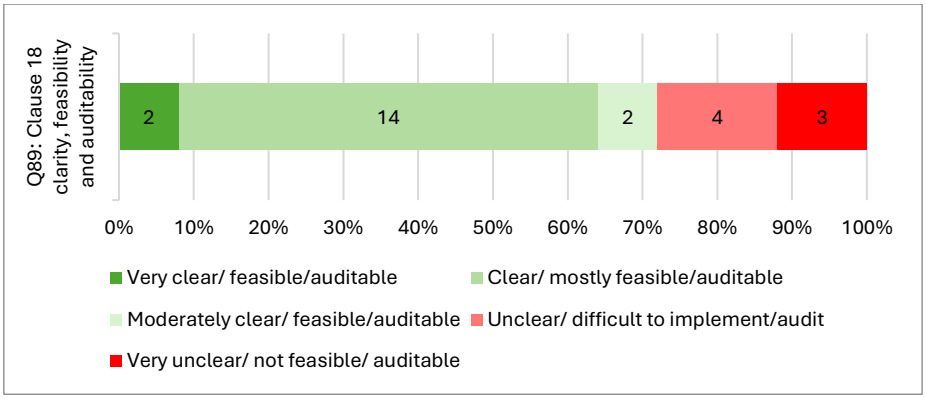

Figure 117 Feasibility and auditability levels by all respondents for Clause 18.

Across stakeholder groups, FSC Members expressed predominantly moderate and positive assessments overall, although some respondents also identified implementation and auditability concerns. Certificate Holders, Certification Bodies/auditors, FSC International staff, and Other stakeholder groups expressed mainly positive views. Consultants and ASI staff expressed comparatively more critical assessments regarding feasibility and auditability. The distribution of responses by stakeholder type is presented in Figure 118.

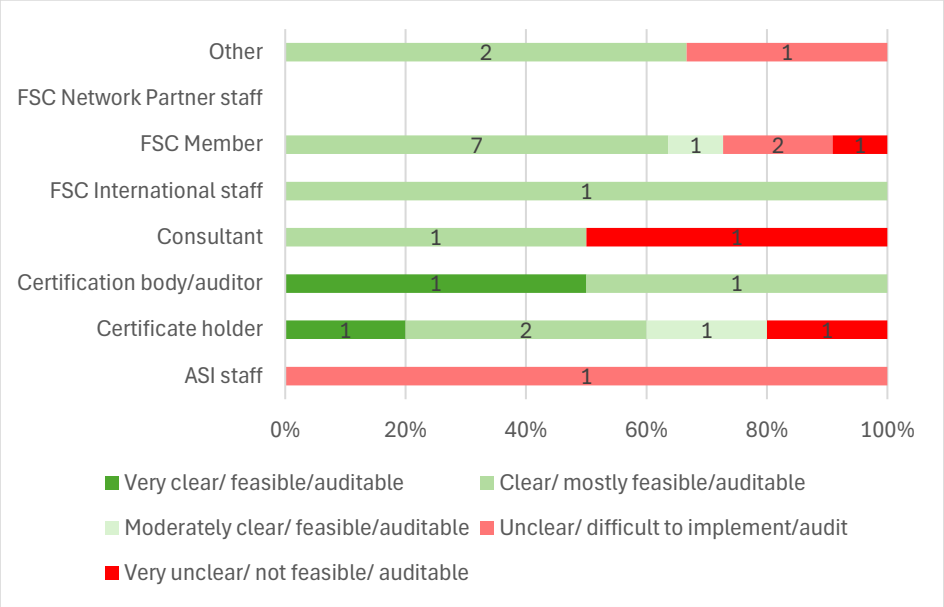

Figure 118 Feasibility and auditability levels by stakeholder type for Clause 18: number of respondents

Differences among FSC membership chambers were also observed. Economic South, Social South, and non-member respondents expressed predominantly positive assessments regarding feasibility and auditability. Economic North respondents expressed comparatively more mixed views, including several responses indicating feasibility or auditability concerns. Environmental North respondents also expressed some concerns regarding implementation difficulty. The distribution of responses by chamber is presented in Figure 119.

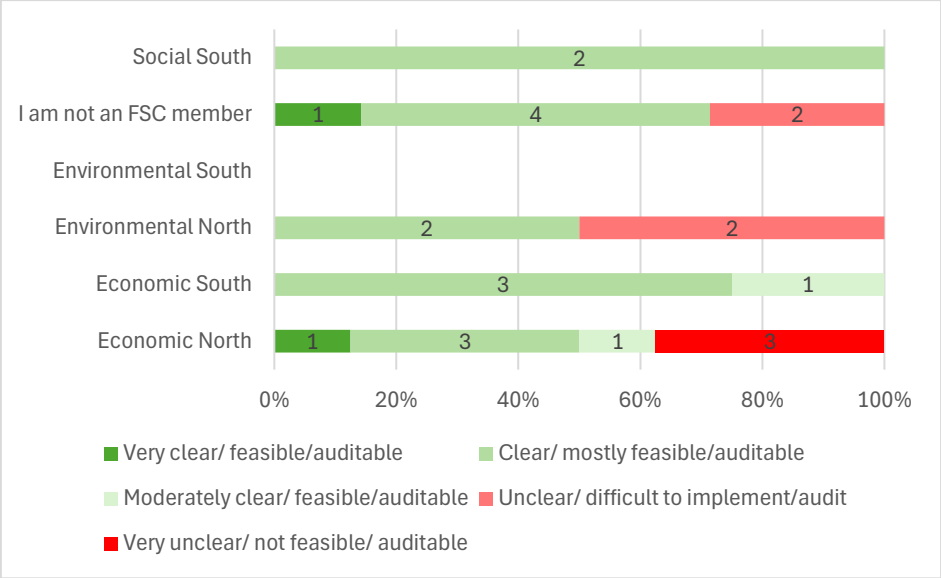

Figure 119 Feasibility and auditability levels by FSC Membership Chambers for Clause 18: number of respondents

Open feedback for Clause 18

Based on the consultation categories provided for the open feedback, the following main issues were identified for Clause 18:

a) Reasons for disagreement with the intent and/or scope: respondents expressed concerns that the Clause remains highly conceptual, process-oriented, and insufficiently operationalized. Some stakeholders also questioned whether certain adaptive management expectations are already addressed elsewhere within the FSC framework.

b) Practical implementation constraints: stakeholders identified challenges related to integrating monitoring results into management planning, operationalizing adaptive management processes over long timeframes, and maintaining proportionality relative to organizational capacity and ecological uncertainty.

c) Auditing and verification challenges: respondents questioned how certification bodies could consistently assess adaptive management responses and the integration of monitoring findings into management planning in the absence of measurable criteria and clearly defined expectations.

d) Further clarification or definitions required: multiple comments requested clearer operational guidance regarding “adaptive management,” “long-term maintenance,” management adaptation triggers, corrective actions, and acceptable evidence requirements for demonstrating implementation.

e) Conflicts with legislation or regulatory frameworks: no major direct legal conflicts were identified, although some respondents raised concerns regarding differing governance capacities, ecological realities, and management planning systems across jurisdictions.

f) Elements to be revised or recommendations: key recommendations focused on clarifying adaptive management methodologies and operational expectations, improving linkage between monitoring findings and management decisions, reducing redundancy and excessive process-oriented wording, improving proportionality and contextual flexibility, and strengthening auditability and implementation consistency.

Table 19 below summarizes the main themes identified in stakeholder feedback and indicates the consultation categories to which each theme relates.

Table 19 Summary of key feedback from participants for Clause 18: Management plan documentation is adapted to reflect the insights gained from monitoring activities and others

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
1	General support for integrating monitoring results into adaptive management	Several respondents support the principle of integrating monitoring results into management planning and adaptive management processes to maintain long-term ecological integrity and socio-cultural values. Positive comments recognize the importance of closing the loop between monitoring and management action.	a, f	FSC appreciates the positive feedback on this Clause. The revised Advice Note retains adaptive management as a core element of the monitoring framework through Clause 12, requiring Organizations to update and adapt their management plans based on monitoring results and other relevant monitoring and evaluation initiatives.
2	Need for clearer operational guidance regarding adaptive management processes	A major recurring concern is that the Clause does not sufficiently explain how monitoring results should be integrated into management plans, what constitutes adequate adaptive management responses, or how long-term maintenance obligations should be operationalized.	d, f	The revised Advice Note clarifies that management plans shall be updated and adapted based on the findings of monitoring activities and other relevant monitoring and evaluation initiatives. This approach builds on the existing requirements of Criterion 7.4 and its associated International Generic Indicators (IGIs), rather than introducing a fundamentally new management process.
3	Clause considered vague, broad, or insufficiently operationalized	Several respondents indicate that the Clause remains highly conceptual and process-oriented, lacking measurable implementation criteria, clear decision-making triggers, or operational specificity regarding adaptive management expectations.	a, b, c, d	The revised Clause has been simplified and provides a clearer link between monitoring and management planning by explicitly requiring Organizations to update and adapt their management plans based on monitoring findings and other relevant monitoring and evaluation initiatives.
4	Auditability and verification concerns	Respondents repeatedly question how certification bodies will consistently verify whether monitoring results have been adequately integrated into management planning, whether adaptive management responses are sufficient, and whether long-term ecological maintenance objectives are being achieved.	c, d	Verification will continue to rely on established FSC certification processes and documented evidence demonstrating how monitoring results have been considered in updates to management plans. FSC has started to develop a monitoring guidance to support consistent implementation and verification.

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
5	Need for clearer definitions and terminology	Several comments request clearer definitions and operational guidance regarding “adaptive management,” “long-term maintenance,” “management adaptation,” and acceptable evidence for demonstrating integration of monitoring results into management planning.	d, f	The revised Advice Note simplifies the adaptive management requirement and aligns it with the existing FSC planning framework. FSC has started to develop a monitoring guidance and a guidance on socio cultural values to facilitate consistent implementation.
6	Concerns regarding practical utility and added value of the Clause	Some respondents explicitly question the practical utility of the Clause, suggesting that its objectives may already be covered elsewhere in the Advice Note or existing FSC requirements. Concerns are raised regarding redundancy and excessive layering of process requirements.	a, f	The adaptive management requirement has been retained because it provides an explicit link between the monitoring requirements of the Advice Note and the ongoing management of ecological integrity features and socio-cultural values. It complements, rather than replaces, the existing FSC planning requirements.
7	Need for stronger linkage between monitoring findings and operational decision-making	Several comments indicate that the Clause should more clearly explain how monitoring results are expected to trigger operational adjustments, corrective actions, or management interventions over time.	b, c, d	This concern has been addressed in the revised Advice Note. Clause 12 explicitly requires Organizations to update and adapt their management plans based on the findings of monitoring activities and other relevant monitoring and evaluation initiatives, establishing a clearer link between monitoring results and management decisions.
8	Need for proportionality and feasibility	Some respondents stress that adaptive management requirements and long-term maintenance expectations should remain proportionate to organizational capacity, available data, and ecological context.	b, d, f	The adaptive management requirement builds upon the existing FSC planning framework and associated IGIs, rather than introducing a separate management system. Further consideration of references to the relevant IGIs, including IGI 7.6, will be undertaken during Phase 2 (V2-0).
9	Concerns regarding long-term ecological uncertainty and recovery assumptions	Several comments note that ecological recovery and maintenance trajectories may be uncertain and influenced by external factors such as climate change, natural disturbance, or broader landscape-level	a, b, c, d	The revised Advice Note recognizes that management should respond to changing conditions identified through monitoring. Factors such as climate change, natural disturbances and other external influences are addressed through the assessment of

No.	Categories of Comments	Summary of Comments	Related category	FSC Clarification
		processes, complicating adaptive management expectations.		threats and risks under Clause 4 and can be incorporated into adaptive management as monitoring information becomes available.
10	Need for contextual flexibility across ecological and governance contexts	Respondents emphasize that adaptive management approaches and long-term maintenance expectations differ across forest systems, governance structures, and socio-cultural contexts, requiring flexibility rather than rigid procedural expectations.	b, d, f	FSC recognizes that adaptive management approaches should reflect different ecological and governance contexts. Further development of region-specific implementation approaches will be considered during Phase 2 (V2-0), while the revised Advice Note provides a simplified and flexible adaptive management framework.

Thanks for your participation!

On behalf of the FSC Policy and Performance Unit and the working group, we would like to thank you for providing your valuable feedback and comments.

The feedback received through this consultation will support the further refinement of ADV1 and contribute to FSC's ongoing work to strengthen outcome-based conservation approaches for Intact Forest Landscapes within the FSC system.

For further information related to the process, please visit the dedicated process page or contact policyinnovation@fsc.org.

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