

FSC Strategy for mixed products and controlled wood

DRAFT CEPI responses to the public consultation (deadline 17 September)

Vision

Vision statement: To reduce the FSC system's reliance on 'FSC Mix' products and the controlled wood used to produce them.

Answer: I am undecided

The vision statement should include a goal of making more FM certified wood accessible and that in the absence of this FSC Mix and controlled wood are necessary to sustain the system.

Alternative wording: FSC has mechanisms to reduce the system's reliance on 'FSC Mix' products and the controlled wood used to produce them. The FSC system has become more efficient and streamlined its requirements. As a consequence more FSC certified wood has become available and therefore reliance on FSC mix products and controlled wood has reduced.

Objective 1: More certified forests

Forest management certification is the prime means of achieving our mission. We have increased the area of FM certified forest across all forest types. We also have mechanisms to reduce reliance on non-certified material over time.

Answer: agree

Objective 2: Certification toolbox

We have effective and efficient tools to help all interested parties to meet the standards and get certified.

Answer: agree

Objective 3: Streamlined requirements

We use effective and credible processes and procedures to achieve a streamlined, feasible, stable, and easily understandable normative framework for mixing and controlled wood, and we have a proper communication process to make certificate holders and stakeholders aware of its content and intention in the field.

Answer: agree

Objective 4: Regional relevance

We recognize sub-regional and cross border realities, and adapt the FSC system accordingly, in line with the FSC mission.

Answer: agree

Objective 5: Assurance and decisions through data

We strengthen supply chain integrity and credibility through the adoption of appropriate technologies and systems to deliver transparency, traceability and assurance of FSC products and claims.

As a data driven organization, we collect verifiable data for understanding and monitoring impact over time. The information is shared and used to inform decision making, and to report to stakeholders.

Answer: I am undecided.

While working to this objective, FSC needs to ensure that data protection and competition legislation and justified data protection concerns by companies are absolutely respected.

Objective 6: Value from sustainable management

We create an enhanced value proposition and benefits of sustainable forest management from forest owners/managers to consumer.

Answer: agree

This is already central part of FSC Global strategic plan. I would delete this objective to decrease the amount of objectives and actions in the CW strategy,

Objective 7: Impact in non-certified areas

We influence non-certified forests by collaborating with governments and other decision makers. We work in partnership and strategic alliances with likeminded organizations to scale up our impact.

Answer: I am undecided

It should be made clear FSC will work with like-minded certification schemes. The objective should continue to benefit from the positive impact of the controlled wood system on uncertified forests.

Objective 8: Communication

We communicate transparently, truthfully and comprehensively about controlled wood, mixing, FSC Mix, and FSC 100% to achieve truth in labelling.

Answer: I am undecided.

The objective should be better communication on the different components of FSC and also on the importance of CW to FSC system while not confusing the consumer with a variety of labels and slogans.

Objective 1: More certified forests

Action 1.1: Incentivize FM and CW-FM certification in supply chains delivering uncertified material, and incentivize the maximum utilization of available FSC certified material (Currently there are cases where available FSC certified material is not utilized, and downgraded to lower FSC claims, or sold without FSC claim), through, but not limited to:

Answer: I am undecided or I have changes that I believe are required.

How can the action be changed to help us reach our objective?

Answer: Ensure communication does not discredit FSC Mix. Delete "or require" under 1d

Objective 1: More certified forests

Action 1.2: Incentivize FM and CW-FM group certification, including development of a landscape approach to group certification.

Answer: It is clear. I agree

Objective 1: More certified forests

Action 1.3: Use CW-FM as a step towards FM certification:

Answer: It is clear. I agree

Requirements with fixed timeframes such as proposed 5 years can be difficult to implement in all circumstances and can reduce organization's willingness to apply CW-FM. Such moves should be based on incentives.

Objective 1: More certified forests

Action 1.4: Streamline requirements for national forest management standards:

Answer: It is clear. I agree

Objective 1: More certified forests

Action 1.5: Increase the use of FSC 100% material:

Answer: It is clear. I disagree.

If you are undecided or disagree, why?

Answer: The increase of FSC 100% material should be a consequence of the previous actions, but not incentivised by the standard.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Delete

Objective 1: More certified forests

Action 1.6: Monitor and analyze progress in reducing reliance on mixing and controlled wood.

Answer: It is clear. I am undecided or I have changes that I believe are required.

If you are undecided or disagree, why?

Answer: Confidentiality and data security must be secured.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Include wording relating to the securing of confidentiality and data security.

Objective 2: Certification toolbox

Action 2.1: Enable certification of ecosystem services in forests that do not produce timber and have no interest or reason to achieve FM certification, for example:

Answer: It is clear. I disagree.

If you are undecided or disagree, why?

Answer: The action would develop new areas of activity, which somehow decrease the role of FSC mix products, but the action would also lead FSC away from its goal to

demonstrate economic use of forests goes hand in hand with environmental and social objectives. Ultimately the action would reduce overall timber supply overall and is therefore contrary to the vision.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Remove action 2.1

Objective 2: Certification toolbox

Action 2.2: Foster forest management and chain of custody certification by:

Answer: It is clear. I agree.

Objective 2: Certification toolbox

Action 2.3: Foster certification of non-timber forest products, including development of a strategy for non-timber forest products and its application in the normative framework.

Answer: It is clear. I am undecided or I have changes that I believe are required

If you are undecided or disagree, why?

Answer: The action would only support the CW strategy, if it helped getting more forests certified. The proposed action would have the same effect as the current FSC MIX and CW system. If FSC believes that the current FSC Mix and CW Wood system does not get more forests under FM certification, and reliance on it needs to be reduced, the proposed action would be inconsistent with the new approach.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Remove action 2.3

Objective 3: Streamlined requirements

Action 3.1: Develop and implement an FSC-wide risk management plan:

Answer: It is clear. I am undecided or I have changes that I believe are required

If you are undecided or disagree, why?

Answer: The action needs clarification as to what it means and what it intends to address.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Be more specific about the content of the action. Organizational risk management plan should be needed only in high risk areas.

Objective 3: Streamlined requirements

Action 3.2: Revise rules regulating the development and revisions of FSC normative documents (e.g. standards and procedures) [7], called here the Framework Procedure:

Answer: It is clear. I agree.

Objective 3: Streamlined requirements

Action 3.3: Pilot the revised Framework Procedure in the revision of the CW-FM standard.

Answer: It is clear. I agree.

Objective 3: Certification toolbox

Action 3.4: Apply the final Framework Procedure in the revision of the CoC-CW standard.

Answer: It is clear. I agree.

Objective 4: Regional relevance

Action 4.1: Allow national FSC decision making bodies to select the relevant set of risk assessment indicators from the international set of indicators in the risk assessment process.

Answer: It is clear. I agree.

Objective 4: Regional relevance

Action 4.2: Endeavour to harmonize the forest management and controlled wood frameworks in regions with similar conditions.

Answer: It is clear. I am undecided or I have changes that I believe are required

If you are undecided or disagree, why?

It is generally a good idea, but it is difficult to understand what is meant by harmonization. Level playing field between countries has to be secured but the level of harmonization needed for that should be carefully considered.

Objective 4: Regional relevance

Action 4.3: Establish FSC presence in regions without FSC representation (e.g. in tropical areas where the forests are most at risk).

Answer: It is clear. I agree.

Objective 4: Regional relevance

Action 4.4: Develop FSC in tropical areas through step-wise approach towards implementation of FSC requirements, including partnerships to attract funding etc. (Compare with objective 7).

Answer: It is clear. I agree.

Objective 5: Assurance and decisions through data

Action 5.1: Develop an FSC-wide data strategy.

Answer: It is clear. I am undecided or I have changes that I believe are required.

If you are undecided or disagree, why?

Answer: Certificate holders will not accept this action unless there is absolute assurance of data security and confidentiality.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: FSC should add in the action that confidentiality and data security will be ensured.

Objective 5: Assurance and decisions through data

Action 5.2: Analyze data gathered and use it in applicable decision making (e.g. about audit intensity, compliance with the requirements, changes to the requirements, etc.).

Answer: It is clear. I am undecided or I have changes that I believe are required.

If you are undecided or disagree, why?

Answer: The action is only acceptable if the changes to action 5.1 (assurance of data security and confidentiality) are applied.

Objective 5: Assurance and decisions through data

Action 5.3: Use Earth Observation, GIS, and geospatial analysis tools, including:

Answer: It is clear. I am undecided or I have changes that I believe are required.

If you are undecided or disagree, why?

Answer: The action is not limited to Forest Management, raising confidentiality concerns.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Restrict the action to Forest Management. Publication of company-sensitive data must be voluntary. Consideration of SLIMFs extremely important not to create a bottleneck with too detailed information requirements for their FSC participation.

Delete or modify action 5.3.c

Objective 5: Assurance and decisions through data

Action 5.4: Develop wood identification technologies to verify source of material origin:

Answer: It is clear. I disagree.

If you are undecided or disagree, why?

Answer: This is not a task for FSC, but rather for the research community.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Delete the action.

Objective 5: Assurance and decisions through data

Action 5.5: Develop digital tools to support supply chain integrity from forest to processing facilities:

Answer: It is clear. I am undecided or I have changes that I believe are required.

If you are undecided or disagree, why?

Answer: The tools should not be developed by FSC. Interoperability is the key word. Companies should be able to use the tools they use also under other schemes or for legislative requirements to demonstrate their fulfillment of FSC requirements.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Replace “develop” by “make use of”.

Objective 5: Assurance and decisions through data

Action 5.6: Enable analysis and monitoring of audit data (subject to data flow as in 2.4.a):

Answer: It is clear. I am undecided or I have changes that I believe are required.

If you are undecided or disagree, why?

Answer: Data protection, confidentiality and data security aspects are not mentioned.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Explicitly state that the online reporting respects all aspects of data security and confidentiality under a). The main beneficiary of the data should be FSC which should use it to analyse the impacts of decisions and respectively to develop more workable FSC.

Objective 6: Value from sustainable management

Action 6.1: Formulate and redefine the value proposition which will be more compelling to stakeholders and which can drive an increase in demand for FSC. This will involve the following aspects:

Answer: It is clear. I agree.

This is already central part of FSC Global strategic plan. I would delete this objective to decrease the amount of objectives and actions in the CW strategy,

Objective 7: Impact in non-certified areas

Action 7.1: Develop collaboration with like-minded organizations:

Answer: It is clear. I am undecided or I have changes that I believe are required.

If you are undecided or disagree, why?

Answer: The action does not mention collaboration with like-minded certification schemes.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Collaboration with like-minded certification schemes should be added in the title of the action and explained in the plain text. Add a subchapter: Start work towards mutual recognition of risk assessments.

Objective 7: Impact in non-certified areas

Action 7.2: Communicate FSC's contribution to forestry issues in different fora, including contribution through FM certification and FSC controlled wood risk assessments.

Answer: It is clear. I agree.

Objective 7: Impact in non-certified areas

Action 7.3: Link forests with public development finance (World Bank, ADB, etc.) and private impact investment, using existing and new contacts and including:

Answer: It is clear. I agree.

Objective 8: Communication

Action 8.1: Change the wording of the text of the FSC Mix label, so that it reinforces truth in labeling:

Answer: It is clear. I disagree.

If you are undecided or disagree, why?

Answer: Now the focus is only on CW claim and its claimed errors. Communication should not only be about this. The customer would be further confused.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Envisage rather a decrease of labels in order to have one strong message.

Objective 8: Communication

Action 8.2: Update FSC websites, including:

Answer: It is clear. I agree.

Objective 8: Communication

Action 8.3: Provide statements for certified organizations to use in their communication about controlled wood.

Answer: It is clear. I am undecided or I have changes that I believe are required.

If you are undecided or disagree, why?

Answer: CW statements should be voluntary.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Specify that the CW statements are voluntary and supportive material for organizations.

Objective 8: Communication

Action 8.4: Establish the procedure and the advisory committee to review and advise on the changes proposed in actions 8.1, 8.2, and 8.3.

Answer: It is unclear. I am undecided or I have changes that I believe are required.

If you are undecided or disagree, why?

Answer: The action is inconsistent with other actions, for which no such procedure is suggested.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Delete the action, or alternatively clarify procedure for all actions.

Objective 8: Communication

Action 8.5: Transition to the new label.

Answer: It is unclear. I am undecided or I have changes that I believe are required.

If you are undecided or disagree, why?

The multiplication of labels is confusing. If there should be a move to a new label, it should be only one label.

How can the action or sub-actions be changed to help us achieve our objective?

Answer: Amend action to "Move to one label"

Objective 8: Communication

Action 8.6: Educate consumers on the meaning of the FSC labels, including through technology (e.g. apps, YouTube videos, QR codes, reward programs, games etc.).

Answer: It is clear. I agree.