



SUMMARY OF PUBLIC CONSULTATION MATERIALS

PUBLIC CONSULTATION FOR FSC-PRO-01-007 CONVERSION REMEDY PROCEDURE VERSION 1-0 DRAFT 1-0

The purpose of this document is to provide an overview on public consultation materials. Please provide your feedback on FSC-PRO-01-007 Conversion Remedy Procedure Version 1-0 Draft 1-0 through the FSC online public consultation platform [here](#) only.

INTRODUCTION TO THE CONSULTATION

Welcome to the Public Consultation for the FSC Conversion Remedy Procedure Version 1-0 Draft 1-0

This public consultation is open between 1st April and 31st May 2020 and will be used to collect stakeholders' feedback on a series of questions regarding the proposals in the FSC Conversion Remedy Procedure Version 1-0 Draft 1-0. FSC encourages all interested stakeholders to participate and provide their input during this period, as input is critical to the further development of the Procedure.

It is not mandatory to respond to all the questions. You may want to choose sections that are most important/relevant to you. You can save current progress and edit your responses right up until you submit the survey for analysis. It is possible to edit your responses until the close of the consultation period. The estimated time to complete all question items are 30 mins.

Please take the opportunity to share your opinions and suggestions.

Opening date: 1st April 2020 00:00:00 CET

Closing date: 31st May 2020 23:59:59 CET

Thank you in advance for your participation.
Please contact Yan li at y.li@fsc.org for questions.



Please help us understand more about your background and interests by filling the 5 questions below:

1. Please select the option(s) that you identify yourself as to help us understand more about your background and interests.

- Social NGO
- Environmental NGO
- Academic
- Smallholder
- Community member
- Government
- Certificate holder (FM)
- Certificate holder (CoC)
- Indigenous peoples
- CB
- Others

2. Are you an FSC member?

- Yes
- No

3. Are you a member in the Motion 7 Policy on Conversion Consultative forum?

- Yes
- No

4. Would you like to give your consent for being contacted by the consultation organizer or technical working group members via email?

- Yes
- No

5. Will the FSC Policy on Conversion and Conversion Remedy Procedure affect you directly?

- Yes
- No

BACKGROUND INTRODUCTION ON MOTION 7 AND ITS IMPLEMENTATION

Background introduction on Motion 7 Technical Working Group

At the General Assembly 2017 in Vancouver, Canada, the membership approved Motion 7. Please see Motion 7 mandate as below:

Motion 7 Mandate

The membership recognizes the strategic importance of addressing the issues around conversion of natural forest-related ecosystems to plantations and the need for alignment of the diverse ways in which conversion is treated in different parts of the FSC normative framework.

The membership requests that FSC puts in place a mechanism, building upon previous work, which will develop a holistic policy and appropriate treatment at Principle, Criterion and Indicator levels with guidance to national Standards Development Groups, considering compensation for past conversion, in terms of:

- a) restoration and/or conservation for environmental values; and
- b) restitution for socio-economic values.

To address Motion 7 FSC has split the process into two:

- a chamber balanced Working Group (WG) to develop a holistic Policy on Conversion, and
- a Technical Working Group (TWG) to focus on the implementation of the policy.

1. Development of FSC Policy on Conversion

The chamber-balanced Working Group developed the second draft of the FSC Policy on Conversion, and FSC completed the second public consultation to comment on the second draft policy within the months of December 2019 and February 2020.

The policy development is in direct response to:

- [Motion 7/2017](#): Addressing past conversion through restoration and conservation as a requirement for certification of plantations that have converted natural forest area post-1994



It is also linked to:

- [Motion 12/2014](#): Fast-tracking the implementation of motion 18 from GA 2011
- [Motion 18/2011](#): consider under what circumstances and conditions post-1994 converted plantations may be able to be FSC certified
- [FSC Global Strategic Plan 2015-2020](#): FSC is the leading catalyst and defining force for improved forest management and market transformation, shifting the global forest trend toward conservation, restoration, and respect for all
- [Action 15 – FSC Implementation Plan](#): Increase revenue to landowners to support conservation and restoration of landscapes

Further information of the development process can be found on the FSC Policy on Conversion webpage [here](#).

2. Development of the Operationalization Mechanism for FSC Policy on Conversion

The Motion 7 Technical Working Group (TWG) was established in November 2019 following a call for candidates during July – August 2019, to develop a mechanism to translate the FSC Policy on Conversion into operational practices.

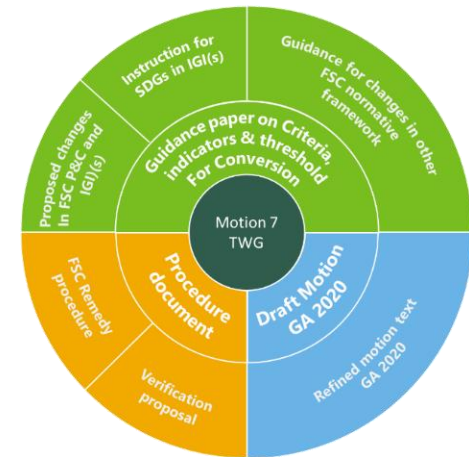
2.1 The Motion 7 Technical Working Group is expected to deliver the following outputs:

- 1) Criteria, indicators and thresholds for conversion across the normative framework, including Policy for Association, Principles and Criteria, International Generic Indicators (IGI), Controlled Wood Standards and others as needed. This includes instructions for Standard Developers to address any revised IGIs on conversion in National Forest Stewardship Standards and Interim National Standards.
- 2) Develop a remedy procedure for:
 - a) Organizations that want to be associated with FSC.
 - b) Certification applicants to address their historical conversion after 1994 and prior to 2020.
 - c) Members, certificate holders, and suppliers of forest products into the FSC supply chain that have been suspended because of violation of conversion rules.
- 3) Draft text for a possible motion to the 2020 General Assembly to reword FSC Forest Management Principles & Criteria and to align the International Generic Indicators (IGIs), National Forest Stewardship Standards, Policy for Association and Controlled Wood standards and Ecosystem Service Procedure with the Policy on Conversion.



2.2 The formats of the deliverables are as below:

- 1) A Report containing:
 - a) proposed criteria, indicators and thresholds on conversion in FSC Forest Management Principles and Criteria, IGI (s) – including instructions for SDGs;
 - b) Guidance on how to revise conversion related criteria, indicators and thresholds on conversion in other parts of FSC normative framework, including:
 - o CW/FM related normative framework;
 - o CW/CoC related normative framework;
 - o FSC Policy for Association;
 - o Ecosystem Services Procedures.
- 2) FSC Conversion Remedy Procedure;
- 3) Draft Motion for GA 2020.



Among these three deliverables, the FSC Conversion Remedy Procedure is the focus of this public consultation. The rationale for not including the Report and draft Motion in this consultation are as following:

Rationale for not including the Report and draft Motion in this consultation

The contents in the Report on conversion and the draft Motion is highly relevant to the principle 3 and 4 in FSC-POL-01-007 V 1-0 D2-0 FSC Policy on Conversion:

Principle 3: FSC aims to incentivize and advance the restoration and conservation of natural forest* and High Conservation Value* areas and restitution of social harm caused by conversion. For that purpose:

- a) Organizations that were directly or indirectly involved* in conversion* on the Management Unit* after November 1994 and before October 2020 are eligible for FSC forest management certification1 of that Management Unit* upon demonstrated compliance with the FSC Remedy Procedure.
- b) Organizations that were directly or indirectly involved* in conversion* after November 1994 are eligible to associate2 with FSC upon demonstrated compliance with the FSC Compensation Procedure.

Principle 4: Organizations that are directly or indirectly involved* in conversion* on the Management Unit* after October 2020 are not eligible for FSC forest management certification of that Management Unit*.

The public consultation of FSC-POL-01-007 V 1-0 D2-0 FSC Policy on Conversion was completed by 17 February 2020, and the Motion 7 WG is in the process of reviewing the consultation feedback and developing final policy draft. The final policy is expected to be



submitted to FSC BoD and PSC for review by June 2020. Based on the consultation results, the principle 3 and 4 in FSC-POL-01-007 V 1-0 D2-0 FSC Policy on Conversion could potentially be revised to reflect the aims and aspiration from FSC members.

Motion 7 TWG aims to incorporate these potential changes into the Report and the draft Motion following further guidance provided by the final draft of policy. Motion 7 TWG plans to include the Report in the next planned public consultation during September to November 2020.

2.3 The members of the Motion 7 Technical Working Group include:

Name	Background
Jamie Lawrence	Forest Economy Lead, TNC
Karen Kirkman	Independent Consultant
Michael Allen Brady	Principal Scientist & Team Leader, Value Chains, Finance and Investment (VFI), CIFOR
Vera Lex Engel	Associate Professor, São Paulo State University-UNESP

As of today, the Motion 7 TWG has held 10 online calls and one face to face meeting. The TWG has held dialogues on the need for revision of conversion criteria, thresholds and indicators across FSC normative framework, remedy procedure for social and environmental impact caused by conversion, etc. During the development of the first draft of the FSC Conversion Remedy Procedure, the TWG has considered various resources, including but not limited to:

- 1) Performance standard No. 6 In IFC
- 2) International Principles & Standards for the Practice of Ecological Restoration, 2nd Edition
- 3) Rainforest Alliance’s draft on restoration and conservation
- 4) FSC internal case study – Uganda case
- 5) FAO restoration
- 6) FSC ecosystem procedure
- 7) RSPO procedures on compensation
- 8) Nepcon - Forest Ecosystem Restoration - Field Verification Standard
- 9) The mitigation hierarchy
- 10) Flores taskforce
- 11) WeForest – a case for forest and landscape restoration quality standard
- 12) The gold standard – afforestation/reforestation requirements
- 13) CIFOR resources on restoration and conservation



- 14) Guiding Principles on Business and Human Rights Implementing the United Nations “Protect, Respect and Remedy” Framework UN 2011
- 15) The HUMAN RIGHTS DUE DILIGENCE FRAMEWORK (HRDD)
- 16) Human rights due diligence in conflict-affected settings
- 17) A Guide to Designing and Implementing Grievance Mechanisms for Development Projects
- 18) Community-based forest resource conflict management A Training Package. RECOFTC /FAO 2002
- 19) Danish Human Rights Institute (DHRI) HRIA methodology
- 20) NomoGaia HRRRA and HRIA
- 21) Swiss Peace Foundation: Enhanced Human Rights Due Diligence in Conflict Affected and High- Risk areas (2016)
- 22) On Common Ground adapted DHRI methodology
- 23) International Alert’s guidance on Conflict Sensitive Business Practices (2005)
- 24) SHIFT: Doing Business with Respect for Human Rights (2016)
- 25) AFI operational guidelines for social remedy and environmental restoration

Following the first public consultation, a second face to face meeting of the TWG will be held during 28 - 31 July 2020 in Bonn, Germany, to discuss the feedback and input from stakeholders and to consider amending and adapting FSC Conversion Remedy Procedure for the second public consultation. According to the approved work plan, the second consultation will be launched during the months of September to November 2020. The final version of the FSC Conversion Remedy Procedure will be submitted to FSC Board of Directors for approval, following the completion of the second public consultation and incorporation of the feedback received.

Supporting documents: [FSC Mission and Statutes](#); [FSC: A Tool to Implement the Sustainable Development Goals](#); [FSC Global Strategic Plan](#); [WG ToR](#), [FSC’s position on plantations](#); [UN Declaration on the Right to Development](#); [UN decade of ecosystem restoration](#).

INTRODUCTION ON THE FIRST DRAFT OF FSC CONVERSION REMEDY PROCEDURE

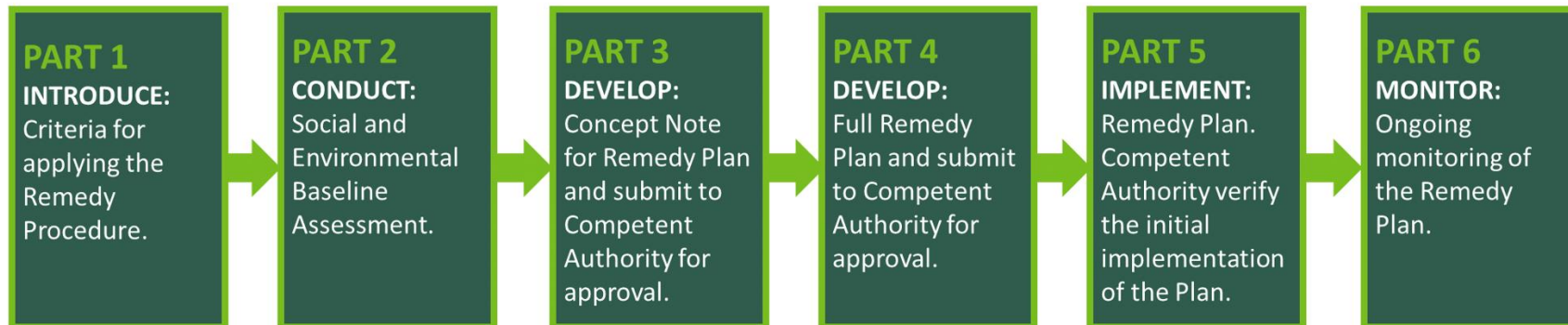
Introduction on the FSC Conversion Remedy Procedure Version 1-0 Draft 1-0

In order to implement the FSC Policy on Conversion, the TWG developed the first draft of the FSC Conversion Remedy Procedure, it contains the following requirements and guidance regarding remedy of the conversion of natural forest:

- Process and indicators for identification of conversion event.
- Technical application of the cut-off rule as proposed in FSC Policy on Conversion Version 1-0 Draft 2-0.
- Remedy process for past conversion, with restoration and/or conservation for environmental values and restitution for socio-economic values.
- Eligibility to enter the FSC system, such as: (1) being associated with FSC, and (2) becoming FSC certified and maintaining FSC certification.

1. Structure of FSC Conversion Remedy Procedure Version 1-0 Draft 1-0

The first draft of FSC Conversion Remedy Procedure contains six parts. Further information on the proposals under each part can be found under the relevant sections in this consultation.





2. Intent of the FSC Conversion Remedy Procedure

The FSC Conversion Remedy Procedure is developed to address conversion and the associated social and environmental harm. FSC believes that the remedy of harm caused from historical conversion, can encourage organizations to take responsibility for their actions while promoting responsible forest management practices in organizations that would have previously not been able to associate with or apply for certification to FSC standards.

Further to this, to incentivize global commitments towards restoration of degraded forests, FSC believes that by providing this procedure it will enable responsible forest managers to enter global markets upon demonstration of remedy actions. FSC recognizes that regardless of timing, harm caused through conversion may be considered the same in similar forest types and in similar social contexts. Since the global awakening that occurred in the early 1990's that led to the establishment of FSC and the increasing urgency of preventing further forest, biodiversity and critical ecosystem losses, FSC has taken a strong position of discouraging further conversion.

Considering this and acknowledging the difficulties of assessing historical harm caused prior to 1994, FSC does not require any remedy action for conversion that happened prior to November 1994. Acknowledging that any historical conversion after 1994 has already caused harm and with the intention of ensuring that since FSC's establishment this harm can be effectively remedied, FSC has developed this Conversion Remedy Procedure to provide remedy requirements in line with international best practices and enable organizations to demonstrate responsible forest management through remedy of harm caused through conversion.

In terms of past conversion, FSC applies the requirements of standards that were in place at that time. Therefore, for past conversion between November 1994 and October 2020, FSC requires that harm caused from conversion of natural forests shall be remedied prior to association with FSC or applying for certification to the FSC standards.

FSC strongly encourages the conservation of all natural ecosystems. As the mission of the FSC is to promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests, the focus of this procedure is primarily to remedy harm caused to natural forests.



3. Major issues to be reviewed in the Procedure following the development of final draft for FSC Policy on Conversion

Please note that this first version of the procedure has been developed based on FSC-POL-01-007 FSC Policy on Conversion Version 1-0 Draft 2-0. This means that consultation feedback into the Policy of Conversion second draft has not been considered in the development of this first draft of the FSC Conversion Remedy Procedure. As part of ongoing development, when the policy is revised, this procedure will be revised as well to consider FSC stakeholder feedback into the overall process of addressing Motion 7. The table below contains the five major issues related to the Remedy Procedure, which need to be reviewed following the development of final draft for FSC Policy on Conversion.

- 1) **The definition of conversion:** definition of conversion (as proposed in FSC Policy on Conversion V1-0 D2-0) contains two different elements: one based on change in vegetation cover, and the other one based on characteristics of a forest that is more aligned to degradation. The additions of degradation criterion in this conversion definition may be going beyond the Motion mandate to consider conversion. It is estimated that reaching a practically applicable threshold for degradation would require additional time and resources, and such threshold may not be practical across the normative framework considering the differing objectives for the various parts of the normative framework.
- 2) **Alignment on conversion:** the objectives across the normative framework varies. Aligning all based on a single policy / set of policy principles may not be practical to implement. It is recommended that the WG consider the objectives of the various normative framework documents to discuss how FSC can align these.
- 3) **Site selection:** Policy on Conversion V1-0 D2-0 requires maximal conservation outcomes (not yet defined) and social benefits relative to other options, while also requiring equivalence and proportionality, and prioritizations relating to location in comparison to the Management Unit. There is potential for these requirements to contradict each other in practice and where trade-offs are required. These should be clarified in the policy prior to further development of normative framework documents to operationalize the policy.
- 4) **Retrospective implementation:** Policy on Conversion V1-0 D2-0 indicates retrospective implementation of several criterion, these include principles, criterion and indicators around conversion applying to High Conservation Values, Controlled Wood standards, definitions, thresholds and requirements for remedy of harm for organizations already in the FSC system. The TWG is concerned about the fairness of the proposed retrospective implementation and concerns raised by other stakeholders indicate the impracticality of implementing principles and criterion retrospectively (potentially from November 1994). It would be advantageous if all new principles are in effect from the date the policy is approved and adopted.
- 5) **Competent Authority:** the concept of a Competent Authority is new in FSC. Experience in FSC with establishing such bodies has proven to have faced challenges. Currently it would appear that the policy intent is to establish one body to oversee all aspects of the implementation of remedy processes. It may be more efficient for FSC to define criterion for a Competent Authority and enable multiple organizations to be authorized by FSC to undertake the functions of a Competent Authority. Meanwhile, concerns around conflicts of interest was raised, questioning if the Competent Authority can oversee the development of remedy plans and also verify the implementation of such plans.



INTRODUCTION ON THE PUBLIC CONSULTATION STRUCTURE

The consultation questions related to FSC Remedy Procedure are as below. In total, there are 10 question items. Please find below an overview of the public consultation questions for the first draft of Guidance paper and FSC Remedy Procedure:

Overview of public consultation questions

Terms & Definitions

Question 1: Do you support the proposed Conversion Threshold?

Question 2: The TWG has used international terms and definitions wherever possible to enable the alignment with International best practice. Do you support this approach and the current terms and definitions?

Part 1: Criteria for applying the Remedy Procedure

Question 3: Do you support the concept that this procedure may be used by anyone (whether they are within the current FSC system or not) for remedy of harms caused by conversion?

Question 4: Considering the intent of various FSC standards and verification methodologies used by FSC, do you believe the Conversion Remedy Procedure could be used in the following normative framework documents: Controlled Wood Standard for FM Enterprises, Requirements for Sourcing FSC Controlled Wood, Policy for Association?

Part 2: Social and Environmental Baseline Assessment

Introduction of Part 2 only, no consultation question/s.

Part 3: Concept Note for the Remedy Plan

Question 5: Is a concept note a good idea to ensure that all parties are satisfied with the baseline assessment, analysis and concepts for the development of the Remedy Plan? If No, do you have suggestions for an alternative approach that would deliver the same assurance?

Part 4: Development of the Remedy Plan

Introduction of Part 4 only, no consultation question/s.

Part 5: Implementation of the Remedy Plan

Question 6: The FSC Conversion Remedy Procedure proposes to follow existing best practice in defining the threshold where an organization may be able to associate or apply for certification. Do you agree with the proposed Initial Implementation Threshold?

Question 7: Considering that priority activities will need to be addressed and the ecosystem needs to be functioning again, is this threshold in the correct place in the restorative continuum?

Question 8: In order to make sure the intent and language for initial implementation threshold is clear, could you please describe what your understanding of the Threshold is?

Part 6: Ongoing Monitoring of the Remedy Plan

Generic Comments

Question 9: Do you have further comments on the first draft of FSC Conversion Remedy Procedure Version 1-0 Draft 1-0?

Question 10: Please describe any parts of the procedure that you did not understand.



TERMS & DEFINITIONS

1. Proposed Conversion threshold

Motion 7 TWG propose the following threshold for the constitution of conversion:

Conversion Threshold: Where the *land use** has changed from the FSC definition of a *natural forest** and / or the *ecosystem function** have been degraded to the point where *natural recovery potential** to *natural forest** is unable to be achieved without direct intervention.

The reference sources considered for the development of this threshold include but not limited to:

- 1) FSC Definition of;
 - Natural Forest
 - Plantations
- 2) International principles and standards for the practice of ecological restoration. Gann et al 2019. Second edition. Society for Ecological Restoration [SER]

The TWG has adapted Forest Types from the UNEP-WCMC 2000. Global Distribution of Current Forests, United Nations Environment Programme - World Conservation Monitoring Centre (UNEP-WCMC) to align this procedure with internationally accepted definitions of forest types as indicated below.

Question 1: Do you support the proposed Conversion Threshold?

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please briefly explain the rationale

Temperate and Boreal Forest Types	
1) Evergreen needleleaf forest	Natural forest with > 30% canopy cover, in which the canopy is predominantly (> 75%) needleleaf and evergreen.
2) Deciduous needleleaf forest	Natural forests with > 30% canopy cover, in which the canopy is predominantly (> 75%) needleleaf and deciduous.



3) Mixed broadleaf/needleleaf forest	Natural forest with > 30% canopy cover, in which the canopy is composed of a more or less even mixture of needleleaf and broadleaf crowns (between 50:50% and 25:75%).
4) Broadleaf evergreen forest	Natural forests with > 30% canopy cover, the canopy being > 75% evergreen and broadleaf.
5) Deciduous broadleaf forest	Natural forests with > 30% canopy cover, in which > 75% of the canopy is deciduous and broadleaves predominate (> 75% of canopy cover).
6) Freshwater swamp forest	Natural forests with > 30% canopy cover, composed of trees with any mixture of leaf type and seasonality, but in which the predominant environmental characteristic is a waterlogged soil.
7) Sclerophyllous dry forest 8)	Natural forest with > 30% canopy cover, in which the canopy is mainly composed of sclerophyllous broadleaves and is > 75% evergreen.
9) Disturbed natural forest	Any forest type above that has in its interior significant areas of disturbance by people, including clearing, felling for wood extraction, anthropogenic fires, road construction, etc.
10) Sparse trees and parkland	Natural forests in which the tree canopy cover is between 10-30%, such as in the steppe regions of the world. Trees of any type (e.g., needleleaf, broadleaf, palms).
Tropical/Subtropical Forest Types	
11) Lowland evergreen broadleaf rain forest	Natural forests with > 30% canopy cover, below 1200m altitude that display little or no seasonality, the canopy being >75% evergreen broadleaf. Includes other types of ecosystems like salt marshes, spit forests, bamboo forests, palm tree forests.
12) Lower montane forest	Natural forests with > 30% canopy cover, between 1200-1800m altitude, with any seasonality regime and leaf type mixture.

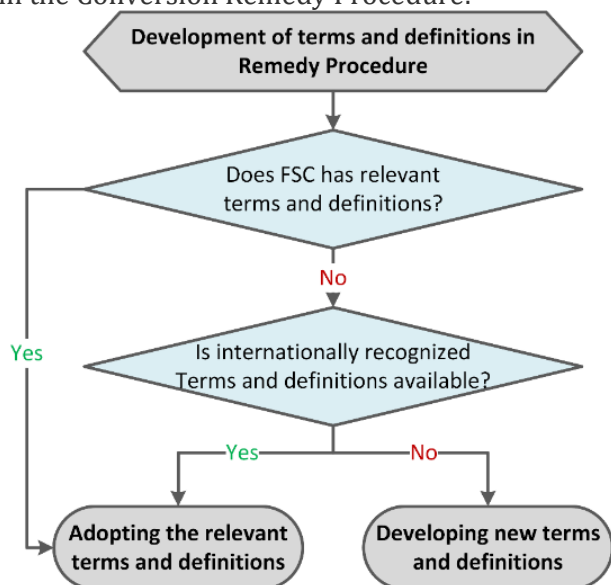


13) Upper montane forest	Natural forests with > 30% canopy cover, above 1800m altitude, with any seasonality regime and leaf type mixture.
14) Freshwater swamp forest	Natural forests with > 30% canopy cover, below 1200m altitude, composed of trees with any mixture of leaf type and seasonality, but in which the predominant environmental characteristic is a waterlogged soil. [including peat]
15) Semi-evergreen moist broadleaf forest	Natural forests with > 30% canopy cover, in which between 50-75% of the canopy is evergreen, > 75% are broadleaves, and the trees display seasonality of flowering and fruiting.
16) Mixed broadleaf/needleleaf forest	Natural forests with > 30% canopy cover, in which the canopy is composed of a more or less even mixture of needleleaf and broadleaf crowns (between 50:50% and 25:75%).
17) Needleleaf forest	Natural forest with > 30% canopy cover, in which the canopy is predominantly (> 75%) needleleaf.
18) Mangroves	Natural forests with > 30% canopy cover, composed of species of mangrove tree, generally along coasts in or near brackish or saltwater.
19) Deciduous/semi-deciduous broadleaf forest	Natural forests with > 30% canopy cover, in which between 50-100% of the canopy is deciduous and broadleaves predominate (> 75% of canopy cover).
20) Sclerophyllous dry forest	Natural forests with > 30% canopy cover, in which the canopy is mainly composed of sclerophyllous broadleaves and is > 75% evergreen.
21) Thorn forest	Natural forests with > 30% canopy cover, in which the canopy is mainly composed of deciduous trees with thorns and succulent phanerophytes with thorns may be frequent.
22) Sparse trees and parkland	Natural forests in which the tree canopy cover is between 10-30%, such as in the savannah regions of the world. Trees of any type (e.g., needleleaf, broadleaf, palms). The two major zones in which these ecosystems occur are in the boreal region and in the seasonally dry tropics.

TERMS & DEFINITIONS

2. Other key terms and definitions and their reference documents:

Motion 7 TWG used the following decision tree for the development of terms and definitions in the Conversion Remedy Procedure:



Question 2: The TWG has used international terms and definitions wherever possible to enable the alignment with international best practice. Do you support this approach and the current terms and definitions?

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please share your concerns and suggestions

Other key terms and definitions as well as their references can be found in the table below:

Key terms and definitions	Reference documents
Conversion Threshold	Adapted from concepts in the International principles and standards for the practice of ecological restoration. Gann et al 2019. Second edition. Society for Ecological Restoration [SER]
Restoration and associated sub-definitions	Adapted from International principles and standards for the practice of ecological restoration. Gann et al 2019. Second edition. Society for Ecological Restoration [SER]
Natural Recovery Potential	
Forest Types	Adapted from UNEP-WCMC 2000. Global Distribution of Current Forests, United Nations Environment Programme - World Conservation Monitoring Centre (UNEP-WCMC)



PART 1: CRITERIA FOR APPLYING THE REMEDY PROCEDURE

It is intended that this procedure applies to organizations that seek to remedy harm caused by conversion. In FSC this would be for organizations that were directly or indirectly involved in conversion that occurred after November 1994 and before October 2020.

This procedure specifies requirements applicable at Management Unit level, for organizations to demonstrate that remedy activities are implemented, and conservation, ecological restoration and social restitution outcomes are delivered.

Compliance with this procedure provides a pathway for organizations that seek FSC certification against National Forest Stewardship Standard, Interim National Standard, or FSC-STD-30-010 Controlled Wood Standard for FM enterprises, or association against FSC-POL-01-004 Policy for Association, to remedy for environmental and social harm caused by conversion.

TWG sees that the intent of different FSC normative framework documents varies, for example: Full Forest Management certification requests the demonstration of compliance against 10 principles and criterion for responsible forest management, while requirements for sourcing FSC Controlled Wood are intended to avoid unacceptable sources from entering FSC supply chains, etc. Besides, the methodology for verifying compliance for different standards varies, for example: Verification for the compliance of FM certification is at Management Unit level, while the verification for sourcing FSC Controlled Wood uses a risk-based approach. TWG would like to seek valuable inputs from FSC membership and stakeholders on the applicability of the Remedy Procedure. Please refer to question 2 for further details. Meanwhile, current application criteria for FSC Conversion Remedy Procedure is as following:

Question 3: Do you support the concept that this procedure may be used by anyone (whether they are within the current FSC system or not) for remedy of harms caused by conversion?

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please briefly explain the rationale

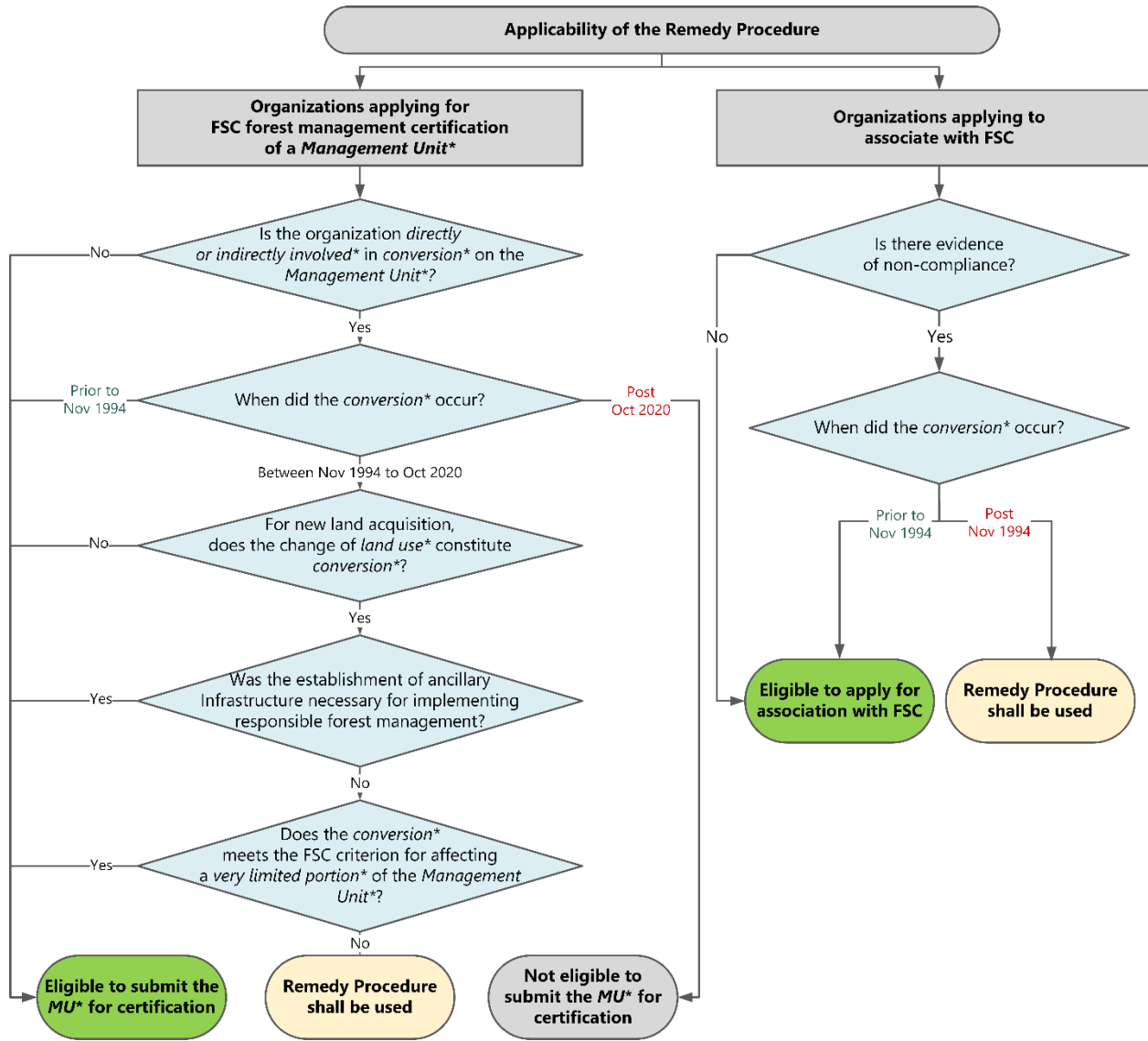
Question 4. Considering the intent of various FSC standards and verification methodologies, do you believe the Conversion Remedy Procedure could be used in the following normative framework documents: Controlled Wood Standard for FM Enterprises, Requirements for Sourcing FSC Controlled Wood, Policy for Association?

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please briefly explain the rationale

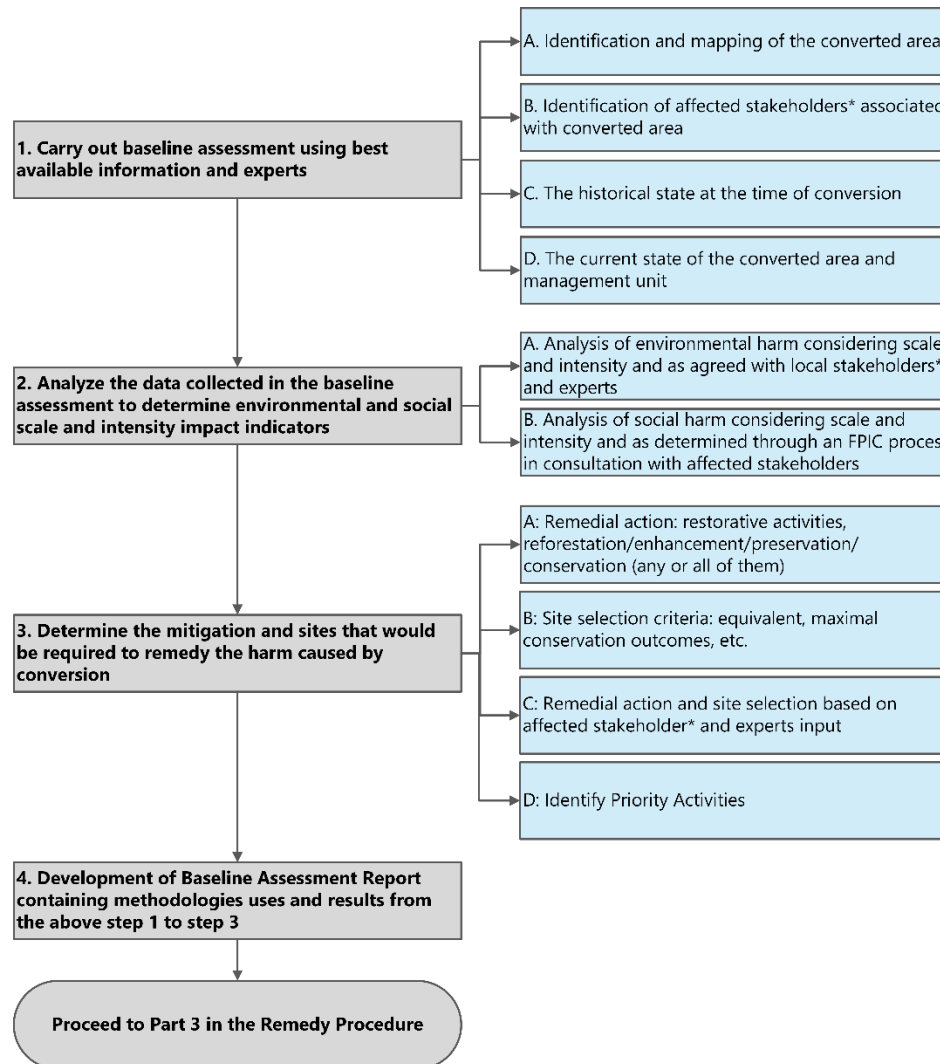


Part 1 of the Remedy Procedure references Annex 2 in the Conversion Remedy Procedure. It describes the applicability of the Remedy Procedure under different scenarios in FSC system.



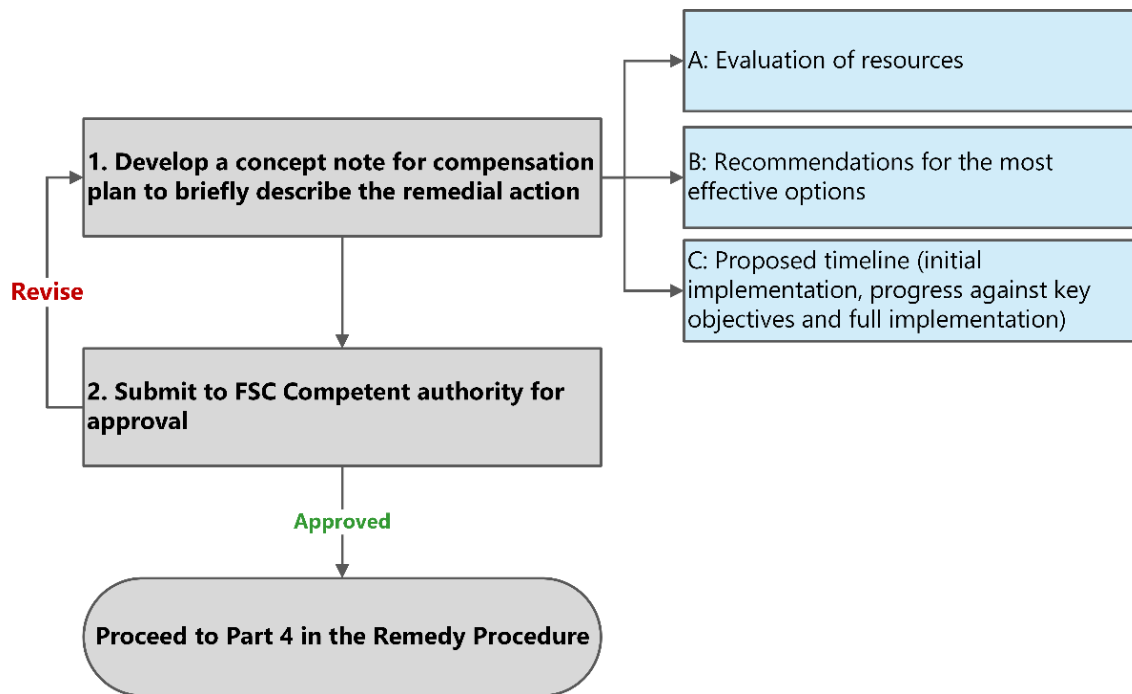
PART 2: SOCIAL AND ENVIRONMENTAL BASELINE ASSESSMENT

Part 2 of the procedure introduces the requirements of a baseline assessment to identify and agree the social and environmental impact caused by conversion with affected parties and experts, and to determine site and mitigation measures needed to remedy the environmental and social harm caused by the conversion. The proposed process flow together with key requirements for each step summarized in the flowchart below:



PART 3: CONCEPT NOTE FOR THE REMEDY PLAN

Part 3 of the procedure describes the requirements of the Concept Note for the Remedy Plan. The Concept Note shall briefly introduce the proposed actions for remedy the determined environmental and social harm following Part 2 and shall be submitted to FSC Competent Authority for review, prior to developing the Remedy plan as defined under Part 4 of the procedure.



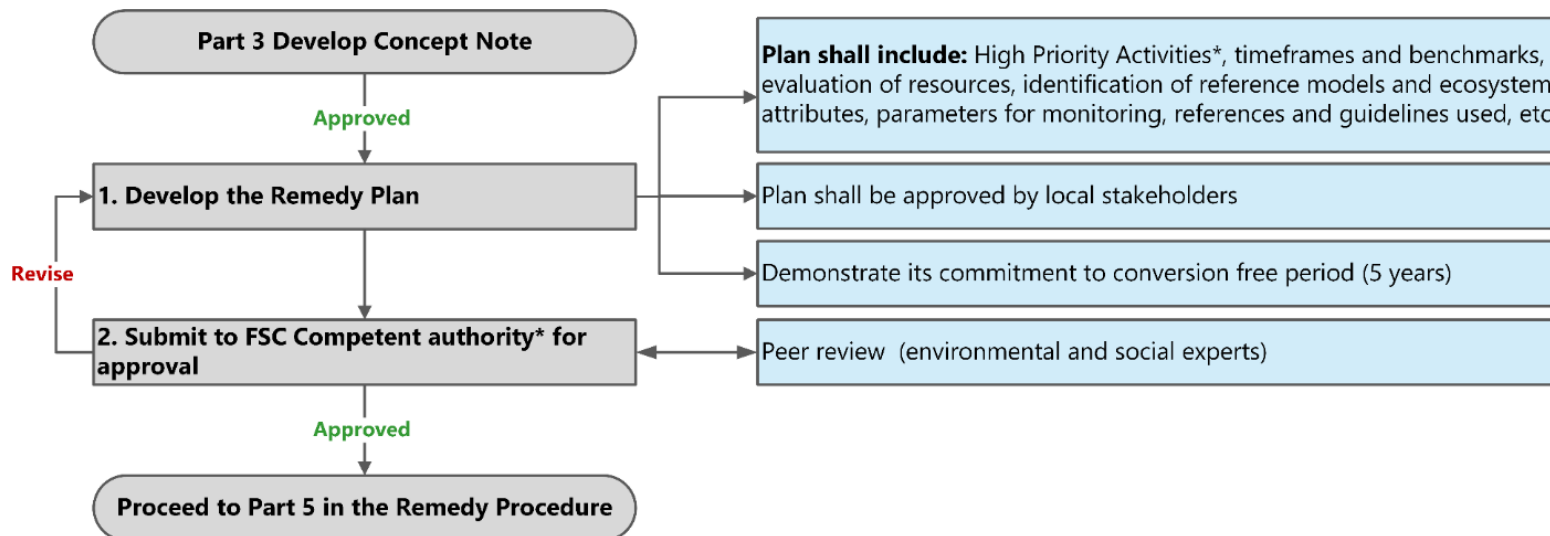
Question 5: Is a concept note a good idea to ensure that all parties are satisfied with the baseline assessment, analysis and concepts for the development of the Remedy Plan?

- Yes
- No

If No, do you have suggestions for an alternative approach that would deliver the same assurance?

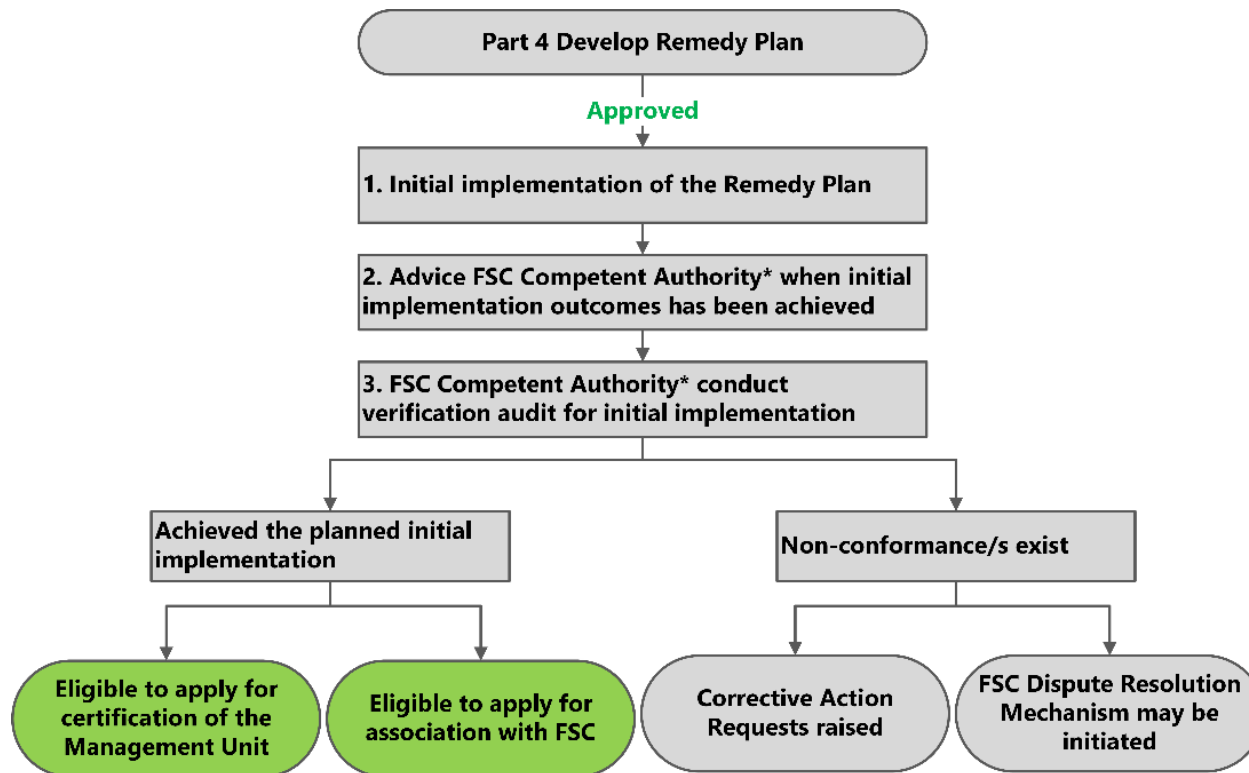
PART 4: DEVELOPMENT OF THE REMEDY PLAN

Part 4 of the procedure describes the requirements for the Remedy Plan. The Remedy Plan shall be developed upon approval of the Concept Note by FSC Competent Authority. The proposed process flow together with key requirements for each step summarized in the flowchart below:



PART 5: IMPLEMENTATION OF THE REMEDY PLAN

Part 5 of the procedure describes once the Remedy Plan is approved by FSC Competent Authority, the organization shall commence the implementation of the Remedy Plan. This part introduces the requirements of development of Remedy Plan. Initial implementation of the Remedy Plan is required for application of FM certification or association with FSC. The proposed process flow together with key requirements for each step is summarized in the flowchart below:

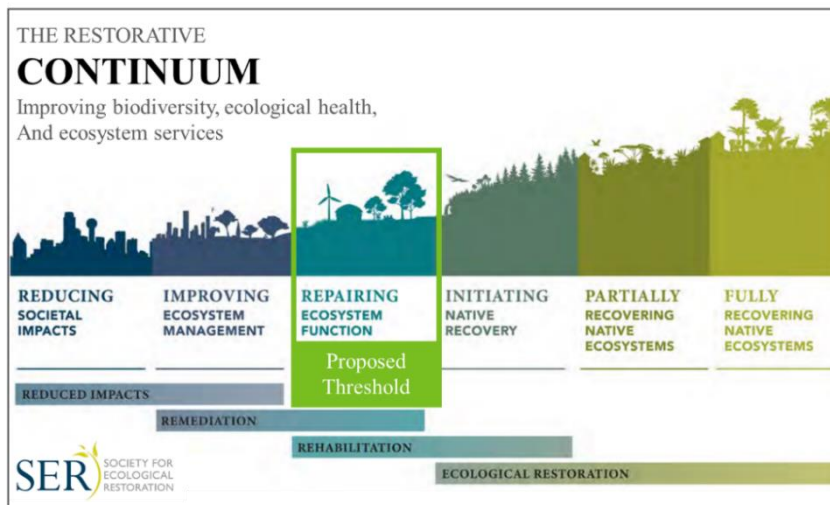




The TWG considered various best practice methodologies for restoration and the monitoring of its implementation. TWG agreed to define the point at which FSC would consider that initial implementation has reached a phase where verification audit can be conducted. Depending on the results of the verification audit for the initial implementation, organizations may then be eligible to apply for certification or apply to associate with FSC. This threshold is currently defined as:

Initial Implementation Threshold: Where the ecosystem function has been restored to the point where native recovery to natural forest is ecologically viable or where a selected natural forest area has been conserved at a level higher than the converted area condition at the time of conversion. Additionally, high priority activities* have been implemented. (*High priority activities include removing threats and remedying harm through FPIC process.)

Adapting the model from International principles and standards for the practice of ecological restoration. Gann et al 2019. Second edition. Society for Ecological Restoration [SER] this point can be graphically displayed as per the graphic below:



Question 6. The FSC Conversion Remedy Procedure proposes to follow existing best practice in defining the threshold where an organization may be able to associate or apply for certification. Do you agree with the proposed Initial Implementation Threshold?

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please briefly explain the rationale

Question 7. Considering that priority activities will need to be addressed and the ecosystem needs to be functioning again, is this threshold in the correct place in the restorative continuum?

- Yes
- No

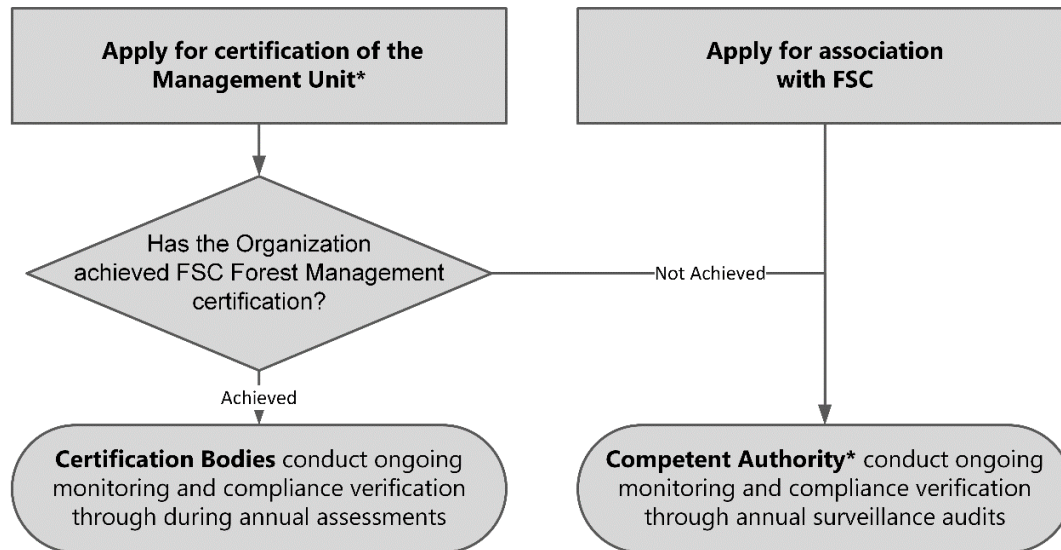
Please briefly explain the rationale

Question 8: In order to make sure the intent and language for initial implementation threshold is clear, could you please describe what your understanding of the Threshold is?

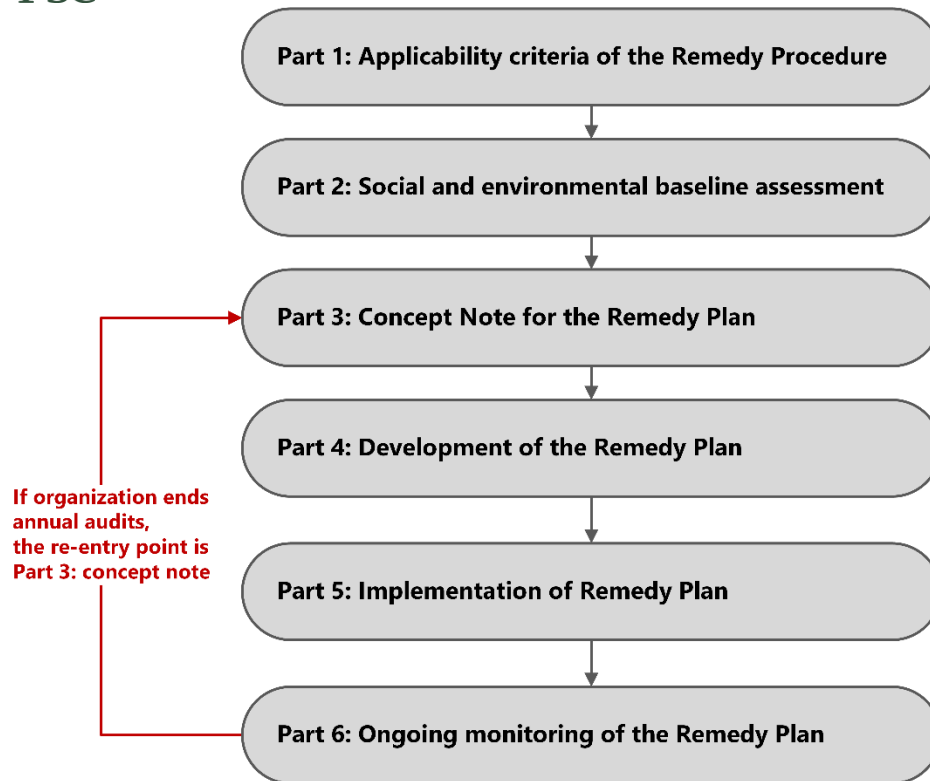
PART 6: ONGOING MONITORING OF THE REMEDY PLAN

Part 6 describes the monitoring mechanism for the Remedy Plan, and the consequences of stopping the ongoing monitoring of the implementation of the Plan, or when Major Non- conformances are identified.

The proposed process flow together with key requirements for the ongoing monitoring of the implementation of remedy plan is summarized in the flowchart below:



If the organization stops the process of ongoing monitoring of the Remedy Plan, then wishes to resume the process of ongoing monitoring, this would require re-submission at concept note level, details as below:





GENERIC COMMENTS

Question 9: Do you have further comments on the first draft of FSC Conversion Remedy Procedure Version 1-0 Draft 1-0?

Question 10: Please describe any parts of the procedure that you did not understand.



THANK YOU VERY MUCH FOR YOUR PARTICIPATION!

Many thanks for your feedback.

On behalf of the Motion 7 Technical Working Group and the FSC Forest Management Program, thank you very much for providing your feedback in this consultation. Please kindly note, it is possible to make changes in your responses during the entire period the consultation is open. Even if you have submitted the response you can return and edit the response.

We plan to hold webinars in English and Spanish for different time zones during the consultation. These webinars are an opportunity to understand development process and the proposals in FSC-PRO-01-007 FSC Conversion Remedy Procedure Version 1-0 Draft 1-0, and to ask questions to help you fill in the online consultation. The registration information for the four webinars is as below:

Webinar information	Registration information
<i>Webinar 1 (EN): 09:00AM – 10:00AM on 15 April 2020</i>	<i>Register for Webinar 1 (EN)</i>
<i>Webinar 2 (EN): 17:00PM – 18:00PM on 15 April 2020</i>	<i>Register for Webinar 2 (EN)</i>
<i>Webinar 3 (EN): 09:00AM – 10:00AM on 13 May 2020</i>	<i>Register for Webinar 3 (EN)</i>
<i>Webinar 4 (ES): 17:00PM – 18:00PM on 13 May 2020</i>	<i>Register for Webinar 4 (ES)</i>

For further information on the Development of Mechanism for the Operationalization of the FSC Policy on Conversion, please visit the FSC webpage [here](#) dedicated to this process.

Thank you very much!