



Forest Stewardship Council®



Public consultation summary report

FSC Guidelines for the Implementation of
the Right to Free, Prior and Informed
Consent (FPIC)

FSC-GUI-30-003 V2.0 draft V1.0

October, 2019

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Overview

Introduction

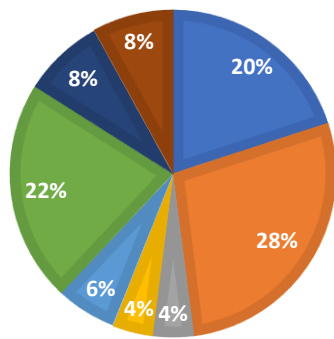
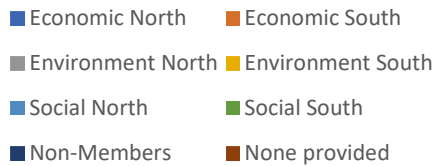
This document provides a detailed summary of the responses received from the Public Consultation Platform for the Guideline on the Implementation of Free, Prior and Informed Consent (FPIC) – Draft 1.0 of Version 2.0.

The responses were categorized by sub-chamber and analysis retained these categories to determine if there were significant overlaps and differences within, as well as between, chambers. The Economic chamber provided the majority the responses at 58%. Unfortunately, very few responses were received from the Environment Chamber and Social North.

The document is organized into three sections: An overview of respondent statistics and major topics were identified in the first section, followed by detailed response summaries indicating major topic identified. The last section provides basic statistics of respondent satisfaction with Draft 1.0 of the FPIC Guideline.

Distribution of Responses by Sub-chamber

RESPONSES BY SUB-CHAMBER



Sub-Chamber	Responses	%
Economic North	10	20
Economic South	14	28
Environment North	2	4
Environment South	2	4
Social North	3	6
Social South	11	22
Non-Members	4	8
None provided	4	8
Total Responses	50	

Distribution of Responses by Country

Sub-region	Country	Responses	
North	Canada	3	15
	Sweden	4	
	United States	2	
	Finland	2	
	Netherlands	1	
	United Kingdom	2	
	New Zealand	1	
South	Brazil	6	35
	Chile	4	
	Peru	3	
	Uganda	3	
	South Africa	3	
	Mexico	3	
	Guatemala	2	
	Argentina	2	
	Ecuador	2	
	Cameroon	1	
	Nicaragua	1	
	Honduras	1	
	Zimbabwe	1	
	Colombia	1	
	Uruguay	1	
Russia	1		

Summary Matrix of Major Topics by Section of Guidance

Major Topics	Sub-Chamber						Others
	Econ North	Econ South	Enviro North	Enviro South	Social North	Social South	
Veto	x	x					
Local Community	x	x				x	
Private land	x	x	x				
IP and LC differences	x	x					x
Conflict with National Laws	x	x		x			x
More Examples	x	x		x		x	
Plantations	x						x
Clarify customary rights		x					x
Prepare Guidance Glossary		x		x		x	
Types of Claims vs Rights Holders	x					x	
SLIMF and SIR	x						
Best efforts					x		x
Iterative decision making	x	x					
Limit Past grievance claims	x						x
Equitable Benefit Sharing	x						x
Clarify Scope of rights						x	
Withhold Consent	x						
Withdraw Consent	x	x					x
Guidance is onerous		x					
Role of State					x		

Note on Spanish Version of Guideline

The Spanish version of the Guideline had some translation mistakes. Every effort will be made to mitigate future translation mistakes. Thank you to the respondents who graciously provided advice on translation.

Acknowledgement of Respondents

The FPIC Working Group and Project Management team from FSC PSU would like to thank all respondents for the tremendous effort and insight offered through the responses provided. We hope that this document demonstrates how seriously we have taken and treated the feedback provided. We look forward to sharing a revised and improved Draft 2.0 of the Guideline soon.

Detailed Summary of Responses

The **bold words** within the tables indicate the main topics identified. Responses were grouped into topics by sub-chamber, paraphrased in most cases and then documented as a summary response. In some cases, direct quotes from responses were used to ensure the context of the statement was preserved. All respondent identifiers were removed, included references to specific countries.

#1 Who has the Right to FPIC?

Sub-chamber	Summary of Responses
Economic North	<ul style="list-style-type: none"> • Focus on the types of rights claims rather than on the people that might hold the right • Clarify the concept of local community [Clarifying statements added] • Clarify definitions [Clarifying statements added] • Clarification of FPIC and veto [Clarifying statements added]
Economic South	<ul style="list-style-type: none"> • Greater clarification of IP rights on private lands needed [New section added] • Further explanation of customary rights needed, e.g. what does “long term” mean? [Clarifying statements added] • Ensure room for regional contexts to be considered, e.g. groups of people being designated as “local communities” without an understanding of local history [Guidance for National Offices added] • Clarify the use of the term “local communities” in relation to P4 vs its use in other P&Cs [Clarifying statements added] • Include additional resources to further explain the conditions under which human rights ought to be considered [New section and new Annex added]
Environment South	<ul style="list-style-type: none"> • Information does not help to differentiate between IP and LC [Clarifying statements added]
Social North	<ul style="list-style-type: none"> • Indigenous rights are not defined by how people are defined, but by how they currently or historically have related to their lands [Clarifying statements added] • Indigenous Peoples and traditional peoples distinguished through legislation; however, the application of the legislation can lead to local conflict [Guidance for National Offices added]
Social South	<ul style="list-style-type: none"> • The definitions do not reflect the diversity that exists [Guidance to National Offices added] • Suggested additional sources to include for identifying rights and rights holders [New section added] • Add criteria or characteristics of Indigenous Peoples [Added]

	<ul style="list-style-type: none"> • Law to support identification of Indigenous Peoples may not be enforced [Guidance to National Offices added]
Non-members	<ul style="list-style-type: none"> • Some countries have well developed definitions of IP, they should be followed [Clarifying statements added] • The definition of local community is vague [Clarifying statements added]
No affiliation stated	<ul style="list-style-type: none"> • The FSC definition of local communities does not work in the context of some countries [Clarifying statements added] • The definitions of traditional peoples and local communities are unclear [Clarifying statements added]

#2 Should the Guidance include regional circumstances to support the FPIC process?

Sub-chamber	Summary of Responses
Economic North	<ul style="list-style-type: none"> • Clarify ‘good faith’ in relation to consultation expectations [Clarifying statements added] • Provide additional guidance for private landowners and for Organizations operating in countries that have not ratified UNDRIP or ILO 169 [Clarifying statements added and Guidance to National Offices added] • Clarity who has the right to participate in decision making in forestry [Clarifying statements added] • Differentiate between private and public lands [Clarifying statements added]
Economic North	<ul style="list-style-type: none"> • Regional circumstances and examples needed (or not) [Guidance for National Offices added] • FSC should not attempt to override state laws in the FPIC process; however, FSC needs to be explicit in programmatic options when the FSC requirements conflict with national laws [Clarifying statements and Guidance for National Offices added] • Include guidance for plantations [Clarifying statements added]
Environment South	<ul style="list-style-type: none"> • What to do when FSC requirements conflict with state laws or where there is a gap in state law and FSC standards [Clarifying statements and Guidance for National Offices added] • Link process to HCV 4-5 and 6 [New section added] • More examples would be helpful [Guidance for National Offices added]
Social North	<ul style="list-style-type: none"> • Add specific information related to particularly trouble regions [Guidance for National Offices added] • Use nationally established identification processes [Guidance for National Offices added]
Social South	<ul style="list-style-type: none"> • Clarify local communities and FPIC [Clarifying statements added] • Regional circumstances and examples provided [Clarifying statements and Guidance for National Offices added]
Non-members	<ul style="list-style-type: none"> • Do not use specific examples • FSC should not attempt to override state laws in the FPIC process; e.g. differentiate legitimate occupancy vs refugees or illegal occupiers [Guidance for National Offices added]

No affiliation stated	<ul style="list-style-type: none"> FSC standards contradict the regional laws and make it impossible to carry out the consent process [Guidance for National Offices added]
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#3 What additional information is needed to identify rights and scope of rights?

Sub-chamber	Summary of Responses
Economic North	<ul style="list-style-type: none"> Acknowledge limits of what the Organization can achieve through FSC [New section added] Provide examples for national circumstances [Guidance for National Offices added] Further development of the scope of rights needed [New section added]
Economic South	<ul style="list-style-type: none"> Concern over veto – or “higher power than CH” [New section added] “Licenses, permits and other titles granted by the Government should not be subject of this Guideline. These are mandatory requirements and have no relation with certification and FPIC” [Clarifying statements added] Identifying customary rights and local community rights at the landscape level and ecosystem service – in consideration of SIR [New section added] More info needed about customary rights [New section added] Difference between an ‘fpic agreement’ and an established other form of agreement? [Clarifying statements added] Add examples to distinguish P3 and P4 rights subject to FPIC [Clarifying statements added] Perceived rights and real legal rights [Clarifying statements added] Clarify who local communities with FPIC rights are [Clarifying statements added] State laws should determine who is Indigenous [Clarifying statements and Guidance for National Offices added] Only significant rights should be addressed [Clarifying statements added]
Environment North	<ul style="list-style-type: none"> Introduce FPIC in the pre-assessment process [Clarifying statements added] Existing certificates may need a separate audit to test their FPIC process [Clarifying statements added] Add decision making ‘authority’ to binding agreement section [Added]
Social North	<ul style="list-style-type: none"> What are ‘rights holders’? [Clarifying statements added]
Social South	<ul style="list-style-type: none"> Harmonize FSC’s approach with UN criteria on human rights [New section added] Ensure concepts are defined – occupation of land, property, traditional use – may not be legal, but mutually agree [[Clarifying statements added]

Sub-chamber	Summary of Responses
	<ul style="list-style-type: none"> • IP and LC may decide not to participate -this should be an option [Clarifying statements added] • Include reference to international legal framework [New section added]
Non-members	<ul style="list-style-type: none"> • State more clearly the differences between P3 and P4 in relation to inside and outside MU [Clarifying statements added]
No affiliation stated	<ul style="list-style-type: none"> • Suggestion that veto may result from the process [New section added] • Consider the use of independent facilitators in the process [Clarifying statements added] • Clarify customary rights [Clarifying statements added] • Not relevant to plantations [New section added] • What does 'around the MU' mean [Clarifying statements added] • Difference between parallel and overlapping rights [Clarifying statements added]

4 General comments on the relevance and application of the operational concepts (end of Part I)

Sub-chamber	Summary of Responses
Economic North	<ul style="list-style-type: none"> • Add periodic review of Binding Agreements [Clarifying statements added] • Guidance needed on SLIMF and SIR [Clarifying statements added] • Operational concepts seem to cause an overreach for FSC [Guideline restructured and Clarifying statements added]
Economic South	<ul style="list-style-type: none"> • Should not negotiate for compensation of past damages [Clarifying statements added] • Role of a neutral facilitator [Clarifying statements added] • Check the Spanish translation against recommendations [Additional review of Spanish translation by WG] • Add Process Agreement to Glossary [New section added] • Specific conditions when a consent can be withdrawn [Clarifying statements added] • Indigenous Peoples may not sign agreements, out of principle [Clarifying statements added]
Environment North	<ul style="list-style-type: none"> • List principles of benefit sharing [Clarifying statements added]
Environment South	<ul style="list-style-type: none"> • Provide examples of binding agreement format [Clarifying statements added] • Define dispute, grievance, conflict, mediation and arbitration [New section added] • Indigenous Peoples should not be allowed to withdraw consent [Clarifying statements added]
Social North	<ul style="list-style-type: none"> • Commentary provided, no suggested changes

Sub-chamber	Summary of Responses
Social South	<ul style="list-style-type: none"> • Binding agreements should be in a language the Indigenous understand [Clarifying statements added] • Inconsistencies between English and Spanish version noted [Additional review of Spanish translation by WG]

#5 Dispute Resolution

Sub-chamber	Summary of Responses
Economic North	<ul style="list-style-type: none"> • Remove figure – too generic [Clarifying statements added] • Link dispute resolution to scope of rights [Clarifying statements added] • Flow charts may read like ‘instructions’ rather than guidelines; central question is the relationship of claimed rights to land [Clarifying statements added] • CH should not have to provide means for dispute resolution (p 38) [Clarifying statements added]
Economic South	<ul style="list-style-type: none"> • Main challenge is to identify rights holders [Clarifying statements added] • Chart complicates the document – refer simply to ‘acceptable dispute resolution processes’ [Clarifying statements added]
Environment North	<ul style="list-style-type: none"> • Review HCS Social Requirements document [Recommended source reviewed and discussed with WG] • What happens when the community has disputes among themselves? [Clarifying statements added]
Environment South	<ul style="list-style-type: none"> • Remove chart [Clarifying statements added] • Dispute process should be documented [Clarifying statements added]
Social North	<ul style="list-style-type: none"> • Flow chart does not convey the complexity of the process [Clarifying statements added]
Social South	<ul style="list-style-type: none"> • Add instructions to ensure that IP are advised of the dispute process [Clarifying statements added] • Differentiate between conflict, claim, dispute and controversy [Clarifying statements and new section added] • Agreement with ILO [Both ILO 169 and UNDRIP are required in C3.4 [Clarifying statements added]
None	<ul style="list-style-type: none"> • Should not have to cease work; need to work within scope of ‘best efforts’ [Clarifying statements added] • IP organizations are complex and difficult to navigate [Clarifying statements added]

#6 General comments on Operational Concepts

Sub-chamber	Summary of Responses
Economic North	<ul style="list-style-type: none"> • Address the term 'equitable benefit sharing' [Clarifying statements added] • Monitoring should describe desired outcome, not process [Clarifying statements added] • Resolution of past grievances is the responsibility of the State [Clarifying statements added] • Revise iterative decision-making section to ensure The Org is able to assess community process [Clarifying statements added]
Economic South	<ul style="list-style-type: none"> • Highlight 'participatory' nature of monitoring [Clarifying statements added] • Clarify how iterative decision making happen in the plantation context [Clarifying statements added] • Security of agreement [Clarifying statements added] • Clarify 'fair compensation' and 'binding agreements' [Clarifying statements added] • P1 should be assessed in terms of ILO 169; gap analysis of policies should be completed by social team [Clarifying statements and Guidance for National Offices added]
Environment North	<ul style="list-style-type: none"> • Need to make sure communities have the capacity to engage [Clarifying statements added] • Clarify iterative decision making [Clarifying statements added]
Social North	<ul style="list-style-type: none"> • Monitoring requires community capacity [Clarifying statements added]
Social South	<ul style="list-style-type: none"> • Clarify monitoring section by adding 'implement monitoring plan' [Clarifying statements added] • Monitoring – difference between FPIC process and management plan [Clarifying statements added] • Mention international legal framework [New section added]
Non-member	<ul style="list-style-type: none"> • Better explanation of equitable benefit sharing [Clarifying statements added] • Past grievances – why does FSC set a higher standard than the country in which it operates? [Clarifying statements added]
None	<ul style="list-style-type: none"> • Process seems to create conflict with current landowners [New section and clarifying statements added]

#7 Requirement for additional HCV guidance in FPIC Guidance

Sub-chamber	Brief Summary of Responses
Economic North	<ul style="list-style-type: none"> • The HCV framework is used beyond FM certification

	<ul style="list-style-type: none"> • Add guidance for IP specific to HCVs – i.e. suggesting specific documents – CH will be aware since they have to implement P9 [Clarifying statements and Guidance for National Offices added]
Economic South	<ul style="list-style-type: none"> • National Office are responsible for HCV Frameworks [Clarifying statements and Guidance for National Offices added] • Does the HCV Guide provide a reference to FPIC Guide? Is the info adequate [Clarifying statements and Guidance for National Offices added] • Do not include HCVs in this Guide – it is confusing [Clarifying statements and Guidance for National Offices added] • Scope of rights subject to FPIC should be limited to ‘significant rights’ [Clarifying statements added]
Environment North	<ul style="list-style-type: none"> • Includes specific references to HCV Guides [Added]

#8 General Comments on Part 1 of FPIC Guidance

Sub-chamber	Brief Summary of Responses
Economic North	<ul style="list-style-type: none"> • Add context of voluntary process [Clarifying statements added] • Full scope of FPIC may not be possible [New section and clarifying statements added] • Expand the application of FPIC to private lands [Clarifying statements added] • Clarification of local communities and private landowners’ rights [Clarifying statements added] • SLIMF application [Clarifying statements added] • Define ‘significant impact’ [Clarifying statements added] • Emphasize the role of SGDs and National offices [Clarifying statements added]
Economic South	<ul style="list-style-type: none"> • Reduce subjective language of Guidance [Revisions and additional review of Spanish translation to address this concern] • Guideline is prohibitively onerous [For WG discussion] • Lacks clarity on rights and how they are ‘lost’ through binding agreements • Confusion around binding agreements and withdrawal of consent [Clarifying statements added] • Emphasize this is not a normative document [Clarifying statements added] • Does not represent the conditions of the south well – plantations and private property [New section and clarifying statements added]
Environment North	<ul style="list-style-type: none"> • Best efforts concept is needed [For WG discussion] • Not enough guidance on private lands [New section and clarifying statements added]

Social South	<ul style="list-style-type: none"> An Indigenous guidance may be beneficial [Indigenous Peoples Manual in development]
Non-member	<ul style="list-style-type: none"> Guidance allows for adaption at regional level [Guidance for National Offices added]
None	<ul style="list-style-type: none"> IP will need their own 'standards' [Indigenous Peoples Manual in development] Requirements will cause CH to leave system and therefore be destructive to the industry [For WG discussion]

#9 Part II - Fundamental Practices – General comments

Sub-chamber	Brief Summary of Responses
Economic North	<ul style="list-style-type: none"> General agreement with practices Guidance should not refer reader to UNDRIP or ILO, rather guidance should operationalize relevant aspects and confirm for the reader that Guidance takes into account those articles [Guidance for National Offices added]
Economic South	<ul style="list-style-type: none"> Remove repetition [Revisions to address this issue] Suggested a number of terms be formally defined [New section and clarifying statements added]
Environment North	<ul style="list-style-type: none"> Should include criterion to select 'significant rights'; existing agreements should negate the requirement of an FPIC process [Clarifying statements added]
Social North	<ul style="list-style-type: none"> Question the ability for FSC to deliver on promise of FPIC [Clarifying statements added]
Social South	<ul style="list-style-type: none"> Clarify scope of rights in P68 [Clarifying statements added] 'Obtain consent' should be partnered with IP giving consent [Clarifying statements added] Difficult to 'ensure' an IP truly understands FPIC in the way it is being expressed by FSC [Clarifying statements added] Strive to reach mutual agreement – may be perceived as pushing for agreement over short time [Clarifying statements added]
Non-member	<ul style="list-style-type: none"> Too much repetition [Revisions to address this issue] Withdrawal of consent is problematic [Clarifying statements added]

#10 Figure 2 – FPIC Process over time

Sub-chamber	Brief Summary of Responses
Economic North	<ul style="list-style-type: none"> IP cannot unreasonably withhold consent if the process is meaningful and carried out in good faith [Clarifying statements added]
Economic South	<ul style="list-style-type: none"> Revise ‘Pitfalls’ [Revisions to address this issue] Too many repetitions [Revisions to address this issue] Remove figure 2 [Revisions to address this issue]
Environment North	<ul style="list-style-type: none"> Add case studies to this ‘living document’ [For WG discussion]
Environment South	<ul style="list-style-type: none"> Difficult to apply in the SLIMF context [Clarifying statements added]
Social North	<ul style="list-style-type: none"> Continued demonstration of best efforts and good faith should be part of process [Clarifying statements added] What happens if consent is not granted? [Clarifying statements added]
Social South	<ul style="list-style-type: none"> Remove Figure 2 [Revisions to address this issue] Clarification of pitfalls needed [Revisions to address this issue]
Non-member	<ul style="list-style-type: none"> Remove Figure 2 [Revisions to address this issue]

#11 and #12 - Step 1: Identify Indigenous Peoples, local communities and their rights

Sub-chamber	Brief Summary of Responses
Economic North	<ul style="list-style-type: none"> Add guidance for private landowners and SLIMF [Clarifying statements added] Section implies veto of IP
Economic South	<ul style="list-style-type: none"> Where IP identified by national laws/legislation – step one is less relevant [Clarifying statements added]
Environment North	<ul style="list-style-type: none"> Private landowners’ rights are not address or identified [Clarifying statements added]
Environment South	<ul style="list-style-type: none"> What happens if there is no ‘defined leadership’ to negotiate with? [For WG discussion] Check flow of document [Revisions to address this issue]
Social North	<ul style="list-style-type: none"> Identifying customary rights is difficult [Clarifying statements added]
Social South	<ul style="list-style-type: none"> If there is no one to register the claim or no government to respond to requests for information – what then? [For WG discussion]

	<ul style="list-style-type: none"> • Management activities should be carried out with the intention of benefiting LC and IP [Clarifying statements added] • IP owned and operated concessions need to be addressed [Clarifying statements added]
None	<ul style="list-style-type: none"> • Plantations – communities don't live in the interior of the plantation, so they don't necessarily have FPIC rights [New section and clarifying statements added] • Cannot halt all operations if IP do not want to engage – best efforts should be considered [Clarifying statements added]

#13, #14 and #15 – Step 2: Prepare for further engagement and agree on scope of FPIC process

Sub-chamber	Brief Summary of Responses
Economic North	<ul style="list-style-type: none"> • Include accommodations relative to SIR and private lands [New section and clarifying statements added]
Economic South	<ul style="list-style-type: none"> • Clarification on what happens if scope is not agreed [Clarifying statements added] • Check Spanish translation [Revisions to address this issue] • Confusing to have IP Guidance with CH guidance [Clarifying statements added and revisions to address this issue]
Environment North	<ul style="list-style-type: none"> • Clarify basic issues: Questions related to legal position of affected stakeholders - support by authorities for enforcement of legal position - possible consequences of non-cooperation (withholding consent) etc. We need to establish a hierarchy of relevance [Clarifying statements added and noted for WG discussion]
Social South	<ul style="list-style-type: none"> • Communication is important to achieving a consent decision • Social team capacities should be emphasized [Clarifying statements added] • IP and LC should be given the time to apply internal decision and dispute resolution processes before being asked to participate in a new proposed system [Clarifying statements added] • What is culturally appropriate? [Clarifying statements added]
None	<ul style="list-style-type: none"> • Steps are reasonable for the country, however there should be a list of laws that are being referenced [Guidance for National Offices added] • Why is there are expectation to expand discussions to other stakeholders? [Clarifying statements added]

#16 and #17 – Step 3: Participatory mapping and impact assessments

Sub-chamber	Brief Summary of Responses
Economic North	<ul style="list-style-type: none"> • If resources are not available for mapping, they should be provided [Clarifying statements added] • Guidance for SLIMF and private lands needed [Clarifying statements added] • Clarify that impact assessments should be limited to future forestry activities of the CH, not another sector [Clarifying statements added and note for WG discussion]
Economic South	<ul style="list-style-type: none"> • Acknowledge that provisions of financial aid to assist with mapping do not influence the decision-making process of the IP/LC – i.e. decisions remain free [Clarifying statements added] • Include only map of forestry activities [Clarifying statements added] • There may be consequences to insisting companies reveal the value of the resource [Clarifying statements added] • Guidance places many demands on the Organization when it should be the responsibility of the IP or LC. [Clarifying statements added] • Concern that agreements are not binding [Clarifying statements added]
Social North	<ul style="list-style-type: none"> • Mapping exercise are expensive – must ensure superior consultant/staff [Clarifying statements added]
Social South	<ul style="list-style-type: none"> • Existing operations – how do they approach this? [Clarifying statements added] • Other sources may be available at the national level for CH to use – eg. NRA info. [Clarifying statements added]

#18 – Step 4: Evaluation and revision of management activities and inform affected rights holders

Sub-chamber	Brief Summary of Responses
Economic North	<ul style="list-style-type: none"> • SLIMF and private lands need to be addressed [Clarifying statements added]
Economic South	<ul style="list-style-type: none"> • Clarify kind of information to be shared [Clarifying statements added] • Examples related to forestry would be helpful [Guidance to National Offices added]
Social South	<ul style="list-style-type: none"> • Include positive impacts in information package [Clarifying statements added]
None	<ul style="list-style-type: none"> • Best efforts approach needed in cases where IP do not want to engage [For review by WG] • How long do CH have to wait for IP decisions (unilateral process) [Clarifying statements added]

#19 and #20 – Step 5: Negotiate an FPIC agreement

Sub-chamber	Brief Summary of Responses
Environment South	<ul style="list-style-type: none"> 5.2 and 5.3 may be difficult for SLIMFs [Clarifying statements added]
Social North	<ul style="list-style-type: none"> Attempting to make all people's capacity equal – not practical [Clarifying statements added] There is a role for government to support IP and LC so that their participation is meaningful – not all governments will support this [Clarifying statements added] Recommend putting limits on what training is offered by CH [Clarifying statements added]
None	<ul style="list-style-type: none"> Dispute resolution possible but must not be required to cease operations [Clarifying statements added]

#21 – Step 6: Verify and formalize the FPIC agreement

Sub-chamber	Brief Summary of Responses
Economic South	<ul style="list-style-type: none"> Company does not normally involve a 3rd party outside of social team [Clarifying statements added]
Environment North	<ul style="list-style-type: none"> Add less formal language to reflect community reality [Revisions to address this issue] Add examples from tests [For WG discussion – later resources to be developed] Attempt to develop 1 infographic of entire process [For WG discussion]
Non-member	<ul style="list-style-type: none"> Verification means additional cost
None	<ul style="list-style-type: none"> National offices should be involved in setting out verification process [For WG discussion]

#22 – Step 7: Implement and monitor the FPIC agreement

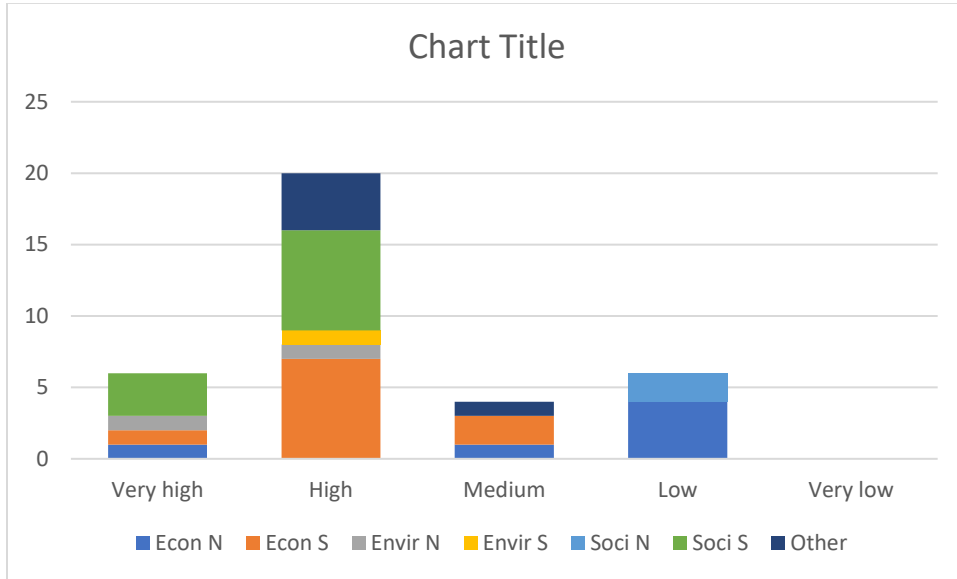
Sub-chamber	Brief Summary of Responses
Non-member	<ul style="list-style-type: none"> A binding agreement should not start over after a decision is reached. If there are changes needed, a dispute resolution process should be initiated [Clarifying statements added] Suggest monitoring committee be used [Clarifying statements added]

General Comments on Presentation of Guidance (#23, 25 and #27)

Sub-chamber	Brief Summary of Responses
Economic North	<ul style="list-style-type: none"> Highlight the role of the document is that of guidance, not normative [Clarifying statements added]
Economic South	<ul style="list-style-type: none"> Improvement possible through removal of repeating sections [Revisions to address this concern] Translation errors need to be corrected sections [Revisions to address this concern] Part II is essential for implementation – Part I useful, but may be intimidating [Restructured document to address this concern]
Environment South	<ul style="list-style-type: none"> Applies to concessions, not well to plantations or private lands sections [Revisions to address this concern]
Social South	<ul style="list-style-type: none"> Improve charts and correct translation errors [Revisions to address this concern] Too complex for small holders [For WG discussion]
Non-member	<ul style="list-style-type: none"> Translation errors need to be corrected [Revisions to address this concern]

Overall Presentation of the FPIC Guideline

#24 Would a table that collates all recommended actions to an FPIC Process be useful? (Ranked responses: Very high to Very low)



How do you rank the presentation of FPIC Guideline?

