



SUMMARY OF PUBLIC CONSULTATION MATERIALS

Public consultation for the revised FSC-PRO-01-001 The Development and Revision of FSC® Normative Documents Version 4-0 Draft 1-0

The purpose of this document is to provide an overview on the public consultation materials. Please provide your feedback on the revised FSC-PRO-01-001 *The Development and Revision of FSC® Normative Documents Version 4-0 Draft 1-0* through the FSC online public Consultation Platform only. Please click [here](#) to submit your comments.

Introduction to the consultation

Welcome to the Public Consultation for the revised FSC-PRO-01-001 The Development and Revision of FSC® Normative Documents Version 4-0 Draft 1-0

This public consultation is open between 29 October 2021 and 7 January 2022 and will be used to collect stakeholders' feedback on a series of questions regarding the proposed first draft of the revised FSC-PRO-01-001. FSC encourages all interested stakeholders to participate and provide their input during this period.

It is not mandatory to respond to all questions. You may choose sections that are most important/relevant to you. You can save current progress and edit your responses right up until you submit your response for analysis. It is possible to edit your responses until the close of the consultation period. The estimated time to complete all question items is 45 mins.

We will hold webinars in English with simultaneous Spanish translation for different time zones during the consultation. In these webinars, we will explain the proposals presented in the revised draft, the questions included in the public consultation, and we will address questions/comments from the public. The registration information is given below:



<i>Webinar information</i>	<i>Date</i>	<i>Time</i>	<i>Registration information</i>
<i>Webinar 1 (EN)</i>	<i>10 November 2021</i>	<i>09:00 – 10:00 CET</i>	<i>Click here to register</i>
<i>Webinar 2 (EN with ES translation)</i>	<i>10 November 2021</i>	<i>17:00 – 18:00 CET</i>	<i>Click here to register</i>

Please take the opportunity to share your opinions and suggestions.

Opening date: 29 October 2021 00:00:00 CET

Closing date: 7 January 2022 23:59:59 CET

Thank you in advance for your participation.
Please contact Francesco Patino at f.patino@fsc.org for comments or questions.



Please help us understand more about your background and interests by filling in the 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
- Certification body
- Others

2. If you are an FSC member please specify your chamber:

- Environmental South
- Environmental North
- Social South
- Social North
- Economic South
- Economic North

3. Please add your email address if you give your consent to be contacted by the coordinator or technical working group.

Background introduction

What is FSC-PRO-01-001 for?

FSC-PRO-01-001 *The Development and Revision of FSC® Normative Documents* (hereafter written as “the procedure”) is a document that provides the process steps for “how to” develop, review, revise, and withdraw international normative documents. At FSC, it is therefore often known as the “mother procedure”.

Why is the procedure being revised?

The Performance and Standards Unit (PSU) identified the need for the revision of the procedure based on a number of issues to be addressed since the last full revision process in 2013 (in 2016, smaller changes were introduced).

Implementation of the current version of the procedure brought important learnings and helped us to identify issues that needed to be addressed as part of the regular review, for example¹:

- Stakeholders showed concern with the **frequent changes to normative documents** that destabilise the FSC normative framework (NF).
- The **same process steps are applied to all types of normative documents** with no differentiation in terms of relevance, risk and effective use of resources.
- **The engagement with stakeholders is not optimal**, as public consultations are not very effective. Oftentimes public consultations have one-directional responses.

In addition, the FSC Global Strategy introduced very important concepts relevant for standard setting, hence to be incorporated in this procedure. A key one is the concept of “streamlining”. In 2021, FSC, in collaboration with an expert consultant, prepared the white paper *Streamlining the FSC Normative Framework and the procedure for the development and revision of normative documents*² (hereafter written as “the white paper”) to inform FSC membership about why FSC needs to streamline the current procedure, and how this will help FSC to streamline the normative framework.

¹ You can find the review report (2019) on the current processes site of FSC-PRO-01-001 ([here](#)).

² You can find the white paper as background documentation in this consultation.



To prepare the white paper, interviews were held with different stakeholders (e.g., members of FSC Board of Directors, members of the Policy and Standards Committee, FSC senior staff, FSC members and individuals). A desktop research and a benchmark analysis were also conducted. Please find the complete analysis white paper in the attached documents uploaded to this public consultation.

Another important need stressed in the FSC Global Strategy, and relevant for standard setting, is the need to demonstrate impact. To enable impact demonstration, adequate provisions for monitoring and evaluation (M&E) must be included in our normative documents.

How is the revision process of FSC-PRO-01-001 being conducted?

FSC created the terms of reference that guide the revision process of FSC-PRO-01-001 and established a technical working group.

The key objectives presented in the terms of reference are to³:

- re-design the process for the development, review and revision of normative documents to increase the process efficiency;
- improve the content quality of normative documents, their relevance, understandability and simplicity;
- embed the following adapted streamlining principles in the revised procedure to facilitate the application of these principles in future normative documents:
 - focus on outcomes to ensure that the NF delivers intended impacts;
 - enable and improve impact assessment and M&E of outcomes;
 - embrace risk management as a guiding principle;
 - harness new technologies in the design and implementation;
 - design normative documents for intended users; and
 - maintain system integrity, transparency and credibility.

The process is guided by a technical working group (TWG) that started its work in January 2021. The members of this TWG are:

³ You can find information about the revision process on the current processes site of FSC-PRO-01-001 ([here](#)).



Table 1: Members of the TWG to revise FSC-PRO-01-001 V3-1

Member	Organisation	Country (region)
Emily McGregor	Regal Springs (prev. Marine Stewardship Council)	UK
Roman Polyachenko	Sustainable Biomass Program (prev. Preferred by Nature)	Estonia
Erica Fonseca	Forest Research and Studies Institute – IPEF	Brazil
Richard Donovan	Independent Forest Advisor, inc. Sustainable Biomass Program	USA

FSC also established a Consultative Forum⁴ to engage with interested parties during the revision process. FSC will reach out to the Consultative Forum members during the preparation of the second draft. As it is expected, the first public consultation will bring an array of diverse comments; FSC looks forward to consulting with the CF to address this feedback.

⁴ Please join the Consultative Forum by clicking [here](#)

What are the key concepts we are seeking your feedback on?

The topics below summarise the main proposals included in the revised draft of the procedure. We would like to hear your opinion on:

1. the flexibility through different process types

FSC proposes 3 different paths to revise a normative document. These are called “process types” and are divided into: major, regular, and accelerated. This separation will facilitate engagement with stakeholders, in particular members, as attention of members is directed to major processes. The process types also allow for a better allocation of resources (e.g., different working group composition, decision-making bodies or deliverables).

2. the introduction of the scoping phase

the scoping phase enables FSC members and other stakeholders to provide input to the preparation of intended outcomes of the revision/development process and to give feedback on high level concepts and key solutions that will later be implemented in the drafting phase.

3. the inclusion of background/ discussion papers in the scoping phase

FSC has introduced a background and discussion paper to complement a review report or proposal. These papers will be shared in the consultation in the scoping phase to define the intended outcomes of the revision/development process.

4. ways to engage with stakeholders

FSC has introduced two different types of consultation (public and targeted), strengthened the Consultative Forum and associated it with the targeted consultation for more intentional stakeholder feedback. Additionally, FSC is working on improving the Consultation Platform.

5. decision-making bodies

FSC has proposed some amendments to decision-making bodies and their responsibilities based on existing mandates. For example, the Policy and Standards Committee makes the final decision for regular process types, instead of the FSC Board of Directors. In turn, the FSC Director General makes this decision for accelerated process types.

6. the policy plan

All planned revision/ development processes starting in the next 2 years are scheduled in a centralized way and prioritized. This will ensure better programmatic alignment, thereby also facilitating and focusing stakeholder engagement.

7. encouragement for testing

FSC expects the use of testing in every revision / development process. In addition, FSC presents 3 types of testing (desk, field, pilot) and suggests which type of test best fits each process type.

8. the transition period and the publication of revised / new normative documents

FSC proposes a default 18-month transition period. The final length of the period can be consulted and discussed within the working group. The 3 months between publication and effective date remain the same.

What are key and background documents in this consultation?

The key document for this consultation is the revised draft of the FSC-PRO-01-001 *The Development and Revision of FSC® Normative Documents*.

Background documents that provide context, but are not being consulted on are:

- The White Paper *Streamlining the FSC Normative Framework and the procedure for the development and revision of normative documents*; and
- The summary of guidance documents that will support the implementation of FSC-PRO-01-001.

What comes next?

Future key milestones in the revision of the procedure are presented in Figure 1.



Figure 1: Key milestones in the revision of FSC-PRO-01-001 in 2022.

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Excerpts from the draft are presented between quotation marks and in a dark green font, “like this example”.

Topic 1 Flexibility through process types (major, regular, accelerated)

Where? Section 1

Background:

- Today, almost every revision or development process in FSC is required to follow the same steps that are presented in the current version of FSC-PRO-01-001 which has little room for flexibility to adapt.

Proposal:

- Well-defined ways to conduct a revision or development process are now being proposed which aim to improve the agility of the FSC standards system, focus stakeholder engagement and better allocate efforts so that certain processes move faster than others.
- FSC presents the process types in section 1. These are the 3 paths to revise or develop a normative document; namely major, regular, and accelerated.
- FSC has developed a narrative to allocate each revision/ development process to a process type. The draft includes:

Section 1 Overview of process types

“1.3 Revision or development processes shall be assigned to a process type according to the following characteristics:

- a) **Major:** applies to the development and revision of FSC policies and FSC Principles & Criteria

NOTE (just for the consultation): It is expected that the development and revision of FSC policies will stem from FSC Engagement work, where new solutions and concepts are being formulated in close engagement with the FSC Membership. Therefore, the intention to designate a “major” process type for such cases, as opposed to a more technical “regular” and “accelerated” process, is to streamline member engagement in standard-setting processes.

- b) **Regular:** applies to the revision of normative standards and procedures, and to the development of normative documents/ requirements based on existing policies or approved documented principles. It also applies to processes that require revision of FSC normative requirements to align with international regulations.
- c) **Accelerated:** it applies to urgent processes to preserve the integrity and credibility of the FSC system (e.g., revisions of standards or procedures, or the development of Advice Notes). It also applies to processes that address non-substantial changes, like correction of typographical mistakes, changes of contact details, or changes that are necessary for information management and information security.

NOTE: It does not apply to processes that provide new documented normative principles on FSC requirements.

- The process types have different steps, actors, or key aspects, as presented hereafter:

Section 1 Overview of process types

Phase	Selected step / key aspect	Bodies and/or key aspects		
		Major	Regular	Accelerated
Review / Proposal	Preparing a Review Report	Document owner (applies to all process types)		
	Decision on Policy Plan	Policy Steering Group (applies to all process types)		
Scoping	Preparing a background or discussion	Discussion paper	Background or	Not applicable

Phase	Selected step / key aspect	Bodies and/or key aspects		
		Major	Regular	Accelerated
	paper	discussion paper		
	Establishing the Consultative Forum	Applies to major and regular process types		Not applicable
	Consultation in the scoping phase	Public	Targeted	Not applicable
	Consultation Report	Full Consultation Report	Short Consultation Report	Not applicable
	Developing the terms of reference (ToR)	Coordinator (applies to all process types)		
	Deciding on the ToR and changes	Board of Directors	Policy Steering Group	Director General
	Deciding on working group composition	Policy Steering Group (applies to processes types)		
Drafting	Establishing the working group	Coordinator (applies to all process types)		
	Drafting of normative documents	Coordinator (applies to all process types)		
	Testing and viability assessment	Voluntary but encouraged. (Desk, field or pilot)		
	Consultation in the drafting phase	Public	Public or targeted	Targeted
	Consultation Report	Full Consultation Report	Full or short Consultation Report	Short Consultation Report
Final decision	Final decision	Board of Directors	Policy and Standards Committee	Director General



Questions:

Question 1. To what extent do you agree with the proposed description for allocating each revision/ development process to a process type?

- Strongly Agree Agree Neutral Disagree Strongly disagree

Question 2. Please briefly explain your rationale.

Question 3. To what extent do you agree with the differentiations (e.g. in terms of decision-making bodies, deliverables) proposed for the 3 process types?

- Strongly Agree Agree Neutral Disagree Strongly disagree

Question 4. Please briefly explain your rationale.

Topic 2 Introduction of the scoping phase

Where? Sections 5 - 8

Background:

- Stakeholders have mentioned that constant invitations to provide comments to detailed requirements are not the best way to engage, as this is time-consuming and not many stakeholders have the time to provide comments in this level of detail.
- Rather, stakeholders have expressed interest in participating in earlier, higher-level discussions that will generate ideas that could then be operationalized in the draft document, implying that member engagement, in particular, will be most relevant in the early phases of the process and less relevant in the drafting phase.
- It is expected that this new engagement early in the process can increase the understanding of the rationale for revising/ developing a document, generate more and better input and even motivate stakeholders to provide detailed input later in the drafting phase.

Proposal:

- The revised draft introduces a “scoping” phase (sections 5 to 8) that enables FSC members and other stakeholders to provide input to the intended outcomes of the revision/ development process and to give feedback on key solutions before the actual requirements are drafted.
- During the “drafting” phase, engagement with members and stakeholders is with those indicating their interest to participate in the consultation process, unless public consultation processes are foreseen (mainly for major processes), see also topic 4 below.
- The sections are: 5 Preparing a background or discussion paper, 6 Establishing a Consultative Forum, 7 Consultation in the scoping phase, and 8 Developing and deciding on the terms of reference.

Questions:

Question 5. To what extent do you agree that earlier and high-level engagement of stakeholders during the scoping phase will make the whole standard-setting process more effective?

- Strongly Agree Agree Neutral Disagree Strongly disagree

Question 6. Please briefly explain your rationale.

Topic 3 Inclusion of background/ discussion papers in the scoping phase

Where? Section 5

Background:

- FSC has been preparing research papers (often in collaboration with consultants) to better understand key issues of a revision or development process.
- Currently, these papers have been classified under different names such as “white paper”, “green paper”, “discussion paper” but FSC uses such terminology of the papers differently than how they are commonly used in contexts outside of FSC (e.g., as used in governmental and intergovernmental discussions).
- The current procedure does not incorporate the purpose and use of these research papers and how they connect with the steps to revise/ develop a normative document.

Proposal:

- The consultation in the scoping phase will be supported by a background or discussion paper (section 5). These papers complement the review report or proposal. These papers are not consulted upon, their messages, however, will better inform the stakeholders during the consultation in the scoping phase.
- The selection of the type of paper depends on the process type and concrete needs of the revision/ development process.
- The purpose of a background paper is to describe the intent of the normative document, the key problems the new/ revised normative document needs to address and information about how the revision process will be conducted.
- A discussion paper usually additionally includes the intended outcomes of the (revised or developed) normative document and/ or proposals to address key topics.

Questions:

Question 7. To what extent do you agree that including background/ discussion papers in the consultation in the scoping phase adds value to revision and development processes?

- Strongly Agree Agree Neutral Disagree Strongly disagree

Question 8. What kind of materials in the scoping phase do you find useful to develop? Please briefly explain your rationale.

Topic 4 Ways to engage with stakeholders

Where? Sections 6, 7, 12

Background:

Consultations

- As presented before, stakeholders, in particular FSC members, have communicated that the number and frequency of invitations to participate in FSC public consultations is too high and leads to stakeholder fatigue.

Consultative Forum

- The current version of the procedure defines the Consultative Forum as a group of stakeholders interested in participating more closely in a revision/ development process.
- Currently, for each process FSC decides when and how to engage with the Consultative Forum.

Consultation Platform

- In parallel, the current Consultation Platform does not allow for interaction between the participants throughout the revision/ development process. The Consultation Platform is only activated during a public consultation and only receives answers from individual respondents.

Proposal:

Consultations

- The revised draft aims to channel consultations in a more meaningful way, by differentiating between public and targeted consultations. Each process type presents the type of consultation to use (sections 7, 12).
- Public and targeted consultations are used in the scoping and drafting phases.
- The draft includes:

Section 7 Consultation in the scoping phase

- a) “**public consultation:** The first round of consultation shall consist of a period of at least sixty (60) days. In exceptional circumstances, including, but not limited to, urgent issues of health and safety, legislation and market conditions, the consultation period can be reduced to no less than thirty (30) days by decision of the Policy Steering Group. The reasons for any such reduction

shall be included in the public summary of the consultation process.

b) **targeted consultation:** The first round of consultation shall consist of a period of at least thirty (30) days. In exceptional circumstances (described above), the consultation period can be reduced to no less than fifteen (15) days by decision of the Policy Steering Group. The reasons for any such reduction shall be included in the public summary of the consultation process.”

- The underlying principle is that public consultations are mainly done for development and revision in major processes, whereas targeted consultations better suit regular processes.
- Targeted consultations, on the other hand, occur in regular and accelerated process types which are intended to be technical processes.
- Interested stakeholders are invited to join the Consultative Forum. Additionally, FSC will actively invite selected experts and stakeholders to participate in targeted consultations.

Consultative Forum

- The current draft defines a Consultative Forum as:

Section E: Terms and definitions

- **Consultative Forum:** is a group of stakeholders who choose to be more closely involved in developing or revising a FSC normative document or are nominated by FSC to provide their input.
- The definition of a Consultative Forum in the draft keeps the focus on interested stakeholders, but also broadens their participation (they do not participate just in the drafting phase but also in the scoping phase) and includes actors that can be nominated by FSC.
- Interested stakeholders can join the Consultative Forum at any point in time during a revision or development process

Consultation Platform

- FSC plans to build a dialogue forum in the current Consultation Platform that allows exchanges between stakeholders rather than just collecting individual feedback.
- FSC also offers webinars on draft consultation documents and is developing a guidance document with best practices for stakeholder engagement.



Questions:

Question 9. To what extent do you agree with the proposed differentiation between public and targeted stakeholder consultations?

- Strongly Agree Agree Neutral Disagree Strongly disagree

Question 10. Please briefly explain your rationale.

Question 11. Do you have any additional suggestions on how engagement with stakeholders can be improved? (e.g. through a remodeled Consultation Platform).

Topic 5 Decision making

Where? Section 1 and throughout the draft document

Background:

- The current procedure presents the Steering Committee (FSC Director General, FSC Policy Director and the coordinator) as a body that guides and supervises the development or revision process of a normative document. This results in having as many Steering Committees as working groups.
- To provide centralized guidance and supervision of all revision or development processes, the Policy Steering Group replaced the former Steering Committees. The Policy Steering Group consists of senior international and regional FSC management staff and takes operational decisions, e.g. to approve the ToR for current technical working groups and the composition of members. The FSC Board of Directors has also mandated the Policy Steering Group to make technical decisions in relation to Forest Stewardship Standards.
- The Policy and Standards Committee is not mentioned directly in the current version of the procedure. The Policy and Standards Committee is a chamber balanced body mandated to provide recommendations to the FSC Board of Directors and to approve National Forest Stewardship Standards.
- The FSC Board of Directors is a chamber-balanced body that approves key process steps for chamber-balanced Working Groups and takes the final decision on all revised/ developed normative documents (this does not apply for deviations, presented in annex 4 of the current procedure).



- The Director General takes decisions on small changes to normative documents (e.g. Advice Notes).

Proposal:

- The revised draft divides decision-making responsibilities based on existing mandates for decision-making and proposes some amendments.
- The revised draft proposes to retain the FSC Board of Directors role for major processes.
- In the draft procedure, the final decision for regular processes is with the Policy and Standards Committee, not the FSC Board of Directors. This would improve efficiency as the Policy and Standards Committee is chamber-balanced and is already the established technical body to review normative documents and approve national standards.
- In the draft procedure, the Policy Steering Group maintains its current mandate as well as now also deciding on the composition of all working groups (including FSC members' based working groups for major processes). Evaluation criteria for working groups are provided for consistent application.
- Another new decision for the Policy Steering Group is on the policy plan as the plan is already guided by the FSC Global Strategy, the Operational Plan and Motions for the General Assembly.
- The role of the Director General stays the same.

Questions:

Question 12. To what extent do you agree with the proposed changes in decision-making responsibilities?

- Strongly Agree Agree Neutral Disagree Strongly disagree

Note: Please bear in mind that the proposed additional mandates for the Policy Steering Group and the Policy Standards Committee are a contentious topic within the Technical Working Group. It is acknowledged that the allocation of decision-making roles is a strategic governance decision, however as part of the revision process of the PRO-01-001 recommendations for amendments to improve efficiency and effectiveness of procedure should be voiced.

Question 13. Please briefly explain your rationale. Particularly in case of disagreement, please be specific about which stage and which decision-making body you are addressing.

Topic 6 Policy plan

Where? Section 4

Background:

- Stakeholders have expressed concerns about the high frequency of changes in the normative framework, as well as the lack of consistency between various processes ongoing at the same time.
- FSC identified that consolidating all development and revision processes under a single plan to support the strategic direction of FSC will bring more clarity and alignment.

Proposal:

- FSC includes the concept of the policy plan in the revised draft of the procedure (section 4). The policy plan is a collective plan of prioritized revision/ development processes that are scheduled to start in the next 2 years. Instead of every process following its own isolated revision cycle, FSC will address the revision schedule and priorities in a centralized way.
- The policy plan is drafted based on review reports and proposals to develop new normative documents. The Policy Steering Group shall review the policy plan and decide to approve or reject requests for a revision process or proposals for development.

Questions:

Question 14. To what extent do you agree that the policy plan helps prioritize revision and development processes of FSC?

- Strongly Agree Agree Neutral Disagree Strongly disagree

Question 15. Please briefly explain your rationale.

Topic 7 Encouragement for testing

Where? Section E and 11

Background:

- The current procedure just states that draft standards may be pilot tested in accordance with the corresponding policy. No other types of tests are specified.
- Not encouraging new requirements to be tested prior to the final decision-making step prevents FSC from knowing how the requirements will perform. Outcomes that differ from the expected ones are only visible post-approval and need to be addressed by interpretations, advice notes, or a new revision process.

Proposal:

- FSC is increasing the importance of testing by encouraging the use of testing in every revision or new development process (section 11).
- FSC describes three types of testing. The draft includes:

Section E Terms and definitions

- a) **“Desk test:** the testing of requirements or concepts in a normative document is conducted based on a theoretical exercise that do not involve field tests.
 - b) **Field test:** the testing of requirements or concepts in a normative document is conducted in the field. Feedback is obtained directly from the exercise. A field test cannot result in the issue of an FSC certificate, or in the use of the FSC logo.
 - c) **Pilot test:** the testing of requirements or concepts in a normative document is conducted in the field. Feedback is obtained directly from the exercise. Based on draft requirements, a pilot test may result in awarding temporary certification and the use of the FSC logos.”
- FSC suggests which testing types best fit which process type but states that the decision on the type of testing to conduct will depend on the specific needs of the process:
 - a) Desk tests may be helpful for any type of process and for the first draft of a normative document.
 - b) Field tests are suggested for regular processes.
 - c) Pilot tests may be helpful in the process to develop a new normative document or to test the incorporation of new concepts.
 - FSC, in response to certification bodies’ suggestions, adds the production of a viability assessment after the testing to assess the likely effects that proposed changes to a normative document will have on different stakeholders.



- Please bear in mind that further work on testing tools is envisaged in this revision process.

Questions:

Question 16. To what extent do you agree with FSC's encouragement for testing?

- Strongly Agree Agree Neutral Disagree Strongly disagree

Question 17. Please briefly explain your rationale.

Topic 8 Transition period and publication of revised/ new normative documents

Where? Section 16

Transition period

Background:

- The transition period is the period of time in which the new version of an FSC normative document is phased in and in parallel, the old version is phased out. To allow for a gradual introduction, both versions are valid for an overlapping period of time.
- The current procedure has a fixed transition period of 12 months. Although the FSC Board of Directors can modify this timeframe, this modification has rarely occurred.
- In addition, FSC has a 3-month period between the publication and the effective date (effective date is the date when the published document becomes applicable for use).
- Certification bodies have expressed concerns with these timelines stating they are insufficient and inflexible.

Proposal:

- FSC proposes a default 18-month transition period. The final length of the period can be consulted and discussed within the working group (section 10). The 3 months between publication and effective date remains the same.



Questions:

Question 18. To what extent do you agree with the proposals on the transition period and the time between publication and effective date?

- Strongly Agree Agree Neutral Disagree Strongly disagree

Question 19. Please briefly explain your rationale.

Publication of revised/ new normative documents

Background:

- The current procedure foresees that normative documents are published only once a year (on January 1st). To date, this clause has been an aspirational one and in practice it proved infeasible. Stakeholders have raised concerns that publications at any time of the year make it more difficult for certificate holders and certification bodies to manage change.

Proposal:

- To improve the stability and predictability of the normative framework the proposed draft now includes that revised or new normative documents are published twice a year (January 1st and July 1st).

Questions:

Question 20. Do you agree with publishing revised or new normative documents on January 1st or July 1st?

- Strongly Agree Agree Neutral Disagree Strongly disagree

Question 21. Please briefly explain your rationale.

Topic 9 Closing remarks

Background:

- The current version of the procedure does not allow FSC to adapt fast enough to innovate and address challenges.



Proposal:

- FSC has introduced new concepts in this draft of the revised procedure and has attempted to do so in a clear and user-friendly way for mainly FSC staff and working groups.
- In addition, FSC is developing internal guidance documents to support FSC staff in the drafting of normative documents. These guidance documents are:
 - a) Guidance on assessing the viability of changes
 - b) Guidance on stakeholder engagement
 - c) Guidance on the management of working groups
 - d) Guidance on drafting simplified normative requirements
 - e) Guidance on drafting outcome-oriented normative documents
 - f) Guidance on drafting risk-based requirements

Questions:

Question 22. Do you have general comments on the structure and content of the document?

Question 23. Please let us know your comments when they do not fall under the questions presented above. Please refer to the clause in the document your comments relate to.

THANK YOU VERY MUCH FOR YOUR PARTICIPATION!

On behalf of the FSC-PRO-01-001 Technical Working Group and the FSC System Performance Program, thank you very much for providing your feedback in this consultation. Please kindly note, it is possible to make changes in your responses while consultation is open (29 October 2021 – 7 January 2022). Even if you have submitted your response, you can return and edit it.

For further information on this revision process, please visit the FSC webpage > Standards > Current processes > Revision of FSC-PRO-01-001, or click [here](#).

Thank you very much and stay well!