Forest Stewardship Council®

PSU Review Report

of

FSC-PRO-01-001 V3-1
The Development and Revision of FSC®
Normative Documents

FORESTS FOR ALL FOREVER™

Report

Status:	Approved
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PSU Review Report

The Forest Stewardship Council (FSC) is an independent, not for profit, non-government organization established to promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC's vision is that the world's forests meet the social, ecological, and economic rights and needs of the present generation without compromising those of future generations.

Summary and recommendation

Reviewed Document

Document code	FSC-PRO-01-001 V3-1
Document title	The Development and Revision of FSC® Normative Documents
Objective of document	The objective of this Procedure is to provide a clear and unambiguous methodology to develop, review, and revise all normative documents in the FSC Normative Framework in order to promote stability and predictability within the FSC system.
Last approval date	25 March 2015
Review triggered by	☒ Regular review as scheduled
	☐ GA Motion or Board decision
	☐ New or changed FSC policies or legislation
	☐ Change Requests
	☒ Other (please specify): FSC Global Strategic Plan 2015 - 2020
Reviewer	Name: Dorothee Jung-Wilhelm
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Draft Review Report	17 July 2019
Public consultation	18 July – 05 September
Final Review Report	06 September

Recommendation

☒	Full revision
☐	Minor revision [1]
☐	Editorial revision
☐	No revision
☐	Withdrawal

[1] According to *FSC-PRO-01-001 V3-1* Annex 4

Note

If the need for revision is concluded in and supported by stakeholders, the report will be presented to the FSC Board of Directors for decision making. If approved by the FSC Board, the reviewed document will then undergo a revision process as described in procedure *FSC-PRO-01-001 V3-1.*

I. Introduction

This report has been developed according to *FSC-PRO-01-001 V3-1* Clause 9.6 to review (assess) the continued relevance and effectiveness of a normative document. This is a mandatory step before a normative document can be taken to a revision process. In addition, it responds to the Board requirement for a feasibility and impact for all review and revision processes, mandated at their 71st Meeting.

II. Proposed recommendation and justification

PSU recommends a full revision of FSCs' main standard-setting procedure *FSC-PRO-01-001 The Development and Revision of FSC Normative Documents.* This document specifies how documents of the FSC Normative Framework are developed, reviewed and revised. The last full revision was completed in 2013, a minor revision took place in 2015. The revision will incorporate recommendations of the governance review process and potential changes to the *ISEAL Code of Good Practice for Setting Social and Environmental Standards.*

FSC-PRO-01-001 V3-1 is the main vehicle to incorporate streamlining principles into the FSC Normative Framework (i.e., Strategy 1 of the Global Strategic Plan 2015-2020), aiming at simplifying the procedure, accelerating development and revision processes, completing gaps, as well as making it more effective.

The revision process is considered necessary, because the process to develop and revise normative documents is inefficient and does not allow FSC to adapt fast enough to address challenges and seek opportunities. Stakeholders are also concerned about frequent changes to the normative documents which are considered to de-stabilize the Normative Framework and may be due to lack of testing and conducting impact assessments.

The following issues have been identified as topics to be addressed in the revision process:

General

- The division of roles, responsibilities and decision-making structures for FSC normative documents is complex and hierarchical. Process steps are very time consuming, requiring numerous involvements of FSCs' decision making bodies.
- The same process steps are applied to all types of normative documents, policies, standards and procedures with no differentiation in terms of relevance, risk and effective use of resources.
- The procedure offers little flexibility in terms of setting up and managing working groups
- It is difficult to apply the procedure to the development of new/ innovative concepts in an efficient and responsive manner
- The procedure is not organized in a user-friendly way.
- Transitioning between old and new normative documents is inflexible.

Gaps

- The current procedure lacks a chapter on monitoring, evaluation and learning and conducting impact assessments. It is often unclear whether changes in normative documents will work in practise and have the desired effect.
- The procedure lacks guidance on drafting outcome-oriented normative documents

Engagement

- Only a small membership pool is available to participate in chamber-balanced Working Groups. The processes are long and time-consuming which often leads to Working Group member fatigue and drop-out.
- Working Groups do not always function effectively. The required expertise is sometimes lacking.
- Public consultations are not very effective for engagement and often gives one-directional and individual responses.

The recommendation to revise the procedure is based on the following objectives as derived from the FSC Implementation Plan:

- To improve time and resource efficiency (cost-benefits) for FSC by ensuring outcome orientation and incorporating risk-based approaches (Action 1*)[1]
- To improve efficiency of engagement (Working Group members and stakeholders) (Action 6*)
- To strengthen monitoring and evaluation to define and identify which normative document to revise first. (Action 5*)
- To improve impact assessments to stabilize (and thereby streamline) the Normative Framework (Actions 1&4*)
- To organize the procedure in a user-friendly way (Action 4*)

III. Impact analysis

Internal

The revision process of the procedure will impact the review and revision process of all documents of the Normative Framework and development of new documents. It does not directly impact the development of National Forest Stewardship Standards as regulated in FSC-STD-60-006, but potential impacts on this procedure should be considered during the revision process.

It is a standalone document that will not require the amendment of other normative documents to become effective. The revised procedure will be applied to each development, review and revision process following the review and revision cycle of normative documents and according to internal prioritization.

External

The revised procedure is expected to be a core delivery to streamline the Normative Framework, to accelerate the development and revision process and thereby make FSC more responsive to adapt to changes and new opportunities; to strengthen impact assessments and monitoring and thereby increasing the effectiveness and relevance of normative documents; to define principles for streamlining, which includes incorporation of risk-based and outcome-oriented approaches and to clarify and improve engagement of stakeholders. Impacts on key stakeholder groups, such as members and certificate holders are thus expected to be positive.

FSC-PRO-01-001 V3-1 is the main procedure that established FSC's conformity with the *ISEAL Code of Good Practice for Setting Social and Environmental Standards*. This code will be reviewed within ISEAL by end of 2019 and any changes to that code will have to be reflected in the FSC procedure.

Unintended or negative effects are currently not anticipated; however the different objectives need to be balanced well, in particular, speed of processes and

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[1] The Actions refer to the ones listed in the FSC Implementation Plan

responsiveness of the FSC system versus stability and quality of the system, inclusivity and transparency. Impacts to the ability of FSC members to engage meaningfully in FSC normative processes need to be carefully considered.
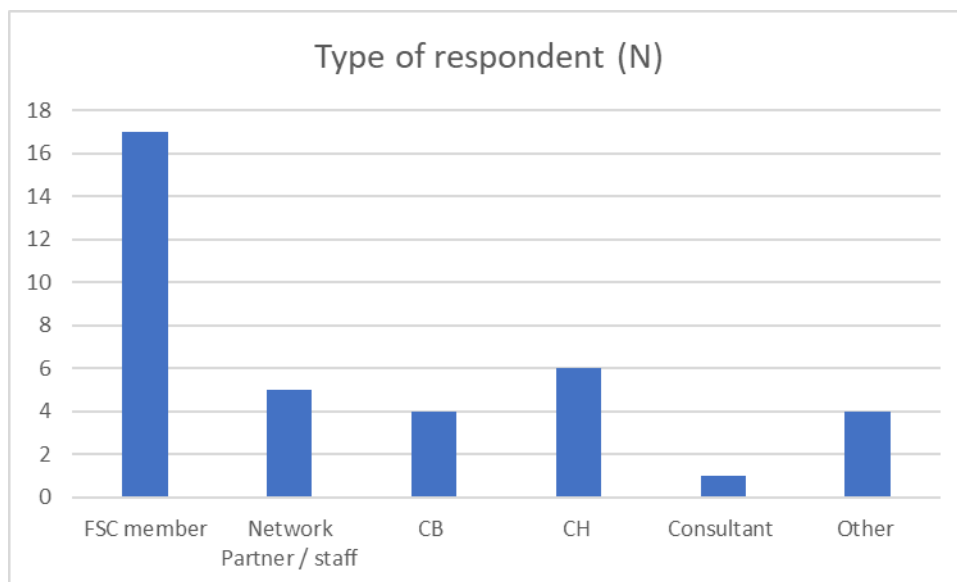
IV. Stakeholder consultation and feedback

Methodology

Stakeholders were invited to provide comments and feedback on the review report from 18 July until 05 September via the FSC consultation platform.
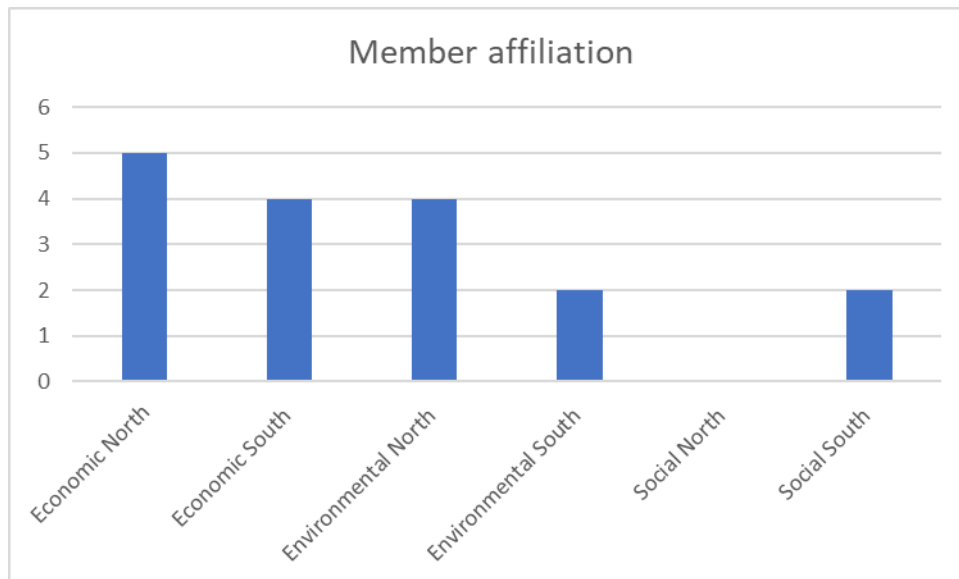
In total, FSC received 29 responses.

26 of the respondents are in favour of a revision, 2 voted against, 1 is undetermined.

Stakeholder composition

Of the 17 FSC members participating in the consultation 8 members belong also to the categories 'CH, 'CB' and 'Other'.

Member affiliation

Additional issues suggested to be addressed in the revision process:

The provided comments in fact confirm issues and topics already referenced in the review report, such as the need to ensure stability of normative documents, issues related with transitioning between two versions of a normative document, need to monitor and track impacts and therefore to collect data and ensuring outcome-orientation of normative documents. All mentioned details will be considered in the development of Terms of Reference guiding the revision process.

Additions to the Impact analysis based on stakeholder feedback are marked in track changes.

The 2 respondents not supporting a revision provided the following reasons:

- No need to revise: the current process is clear and supports transparency.

- Not the right time to revise and the revision itself needs to be accompanied by a full FSC management systems review and revision. It is suggested that FSC should wait for the conclusion of the ISEAL revision process, the completion of the FSC enterprise risk policy on risk management and a roadmap for the conceptual development of outcome-oriented performance standards.