



Forest Stewardship Council®



## PSU Review Report

of

- (a) FSC-STD-60-006 V1-2 Process Requirements for the development and maintenance of National Forest Stewardship Standards,
- (b) FSC STD-60-002 V1-0 Structure and Content of National Forest Stewardship Standards,
- (c) FSC-PRO-60-006 V2-0 Development and Transfer of National Forest Stewardship Standards to the FSC Principles and Criteria Version 5-1, and
- (d) FSC-PRO-60-007 V1-2 Structure, Content and Development of Interim National Standards



<b>Status</b>	Final
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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 Documents

<b>Document codes</b>	<p>(a) FSC-STD-60-006 V1-2</p> <p>(b) FSC-STD-60-002 V1-0</p> <p>(c) FSC-PRO-60-006 V2-0</p> <p>(d) FSC-PRO-60-007 V1-2</p>			
<b>Document titles</b>	<p>(a) Process Requirements for the Development and Maintenance of National Forest Stewardship Standards</p> <p>(b) Structure and Content of National Forest Stewardship Standards</p> <p>(c) Development and Transfer of National Forest Stewardship Standards to the FSC Principles and Criteria Version 5-1</p> <p>(d) Structure, Content and Development of Interim National Standards</p>			
<b>Objective of documents</b>	<p>(a) The objective of FSC-STD-60-006 V1-2 is to provide a clear basis by which proposals and work plans for the development of Forest Stewardship Standards may be evaluated and implemented for conformance with FSC international requirements prior to the commencement of the standard's development and registered with FSC.</p> <p>(b) The standard FSC-STD-60-002 V1-0 is used by Standard development groups (SDGs) to develop regional, national, and sub-national Forest Stewardship Standards. The standard also defines a hierarchical framework which ensures that all FSC Forest Stewardship Standards can be audited in a consistent manner, providing replicable results.</p> <p>(c) The objective of FSC-PRO-60-006 V2-0 is to establish the process for the development of new and transfer of existing NFSS to the P&amp;C V5-1 and establishes how to use the IGIs as a starting point in the process.</p> <p>(d) The objective of FSC-PRO-60-007 V1-2 is to specify the requirements for FSC-accredited certification bodies for developing Interim National Standards (INS) for the certification of responsible forest management and the responsible management of non-timber forest products (NTFPs) at the Management Unit (MU) level.</p>			
<b>Last approval date</b>	<b><u>Document</u></b>	<b><u>Effective date</u></b>	<b><u>Amendment</u></b>	<b><u>Period of validity</u></b>
	FSC-STD-60-006 V1-2	1-Apr-2009	October 2009	1-Apr-2014
	FSC-STD-60-002 V1-0	1-Jan-2010	No amendment	1-Jan-2015
	FSC-PRO-60-006 V2-0	1-Jun-2015	No amendment	1-Jun-2020
	FSC-PRO-60-007 V1-2	1-Oct-2016	March 2020	1-Oct-2021

<b>Review triggered by</b>	<input checked="" type="checkbox"/>	Regular review as scheduled
	<input type="checkbox"/>	GA Motion or Board decision
	<input type="checkbox"/>	New or changed FSC policies or legislation
	<input checked="" type="checkbox"/>	Change Requests
	<input checked="" type="checkbox"/>	Other (please specify): Alignment with other FSC normative documents and topics of high relevance
<b>Reviewer</b>	Name:	Taruna (Program Manager) Cynthia Penalosa (Policy Officer)
	e-mail:	<a href="mailto:nationalstandards@fsc.org">nationalstandards@fsc.org</a>
<b>Draft Review Report</b>	Draft 1-0: 09 September 2021	
<b>Public consultation</b>	Draft 1-0: 13 September 2021-12 October 2021	
<b>Final Review Report</b>	19 November 2021	

#### Recommendation

<input checked="" type="checkbox"/>	Full revision
<input type="checkbox"/>	Minor revision <sup>1</sup>
<input type="checkbox"/>	Editorial revision
<input type="checkbox"/>	No revision
<input checked="" type="checkbox"/>	Withdrawal (or replaced)

<sup>1</sup> According to FSC-PRO-01-001 V3-1 Annex 4

#### Note

The final Review Report with recommendations from PSC will be presented to FSC Board of Directors for decision making. If approved by FSC Board of Directors, the reviewed four 60 series normative documents will undergo a revision process as described in procedure FSC-PRO-01-001 V3-1.

## I. Introduction

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This draft 2-0 Review Report has been developed according to FSC-PRO-01-001 V3-1 Clause 9.6 to review the continued relevance and effectiveness of FSC-STD-60-006 V1-2, FSC-STD-60-002 V1-0, FSC-PRO-60-006 V2-0 and FSC-PRO-60-007 V1-2.

**NOTE: Together, these four documents are referred as '60 series normative documents' for purpose of this Review Report.**

The development of a Review Report is a mandatory step before a normative document can be taken to a revision process. In addition, it responds to the Board requirement for an assessment of feasibility and impact for all review and revision processes, mandated at their 71st Meeting.

This draft 2-0 was developed out of the improvement of draft 1-0, based on comments from the stakeholder public consultation celebrated from 13 September 2021 to 12 October 2021.

## II. Proposed recommendation and justification

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Strategy 1 of the FSC Global Strategy 2021-2026 envisages to co-create and implement forest solutions. Strategy Goal 1.2 aims to streamline policies and standards to make them easier to understand and implement consistently; to reduce complexity and reflect risk, while ensuring credibility and enabling more focus on desired outcomes delivered through good performance. One of the intended outcomes of this strategy is to produce FSC policies and standards that are (1) based on clear and consistent principles of streamlining and outcome-orientation; (2) ensure high integrity, credibility, and balance global consistency with local adaptability; and (3) risk based, clear, relevant, reliable, and efficient, and that demonstrate and communicate positive changes. The revision of the 60 series normative documents will introduce new/revised requirements for developing and maintenance of Forest Stewardship Standards (FSS). With revision in requirements, the FSS will be more consistent, outcome-oriented, and user-friendly, thus contributing to the Goal 1.2.

There are several factors and processes that drive the revision of the 60 series normative documents, including experience and feedback from within and outside the Performance and Standards Unit (PSU). Some of the key drivers for the proposed revision of 60 series normative documents include the following:

- 1. Inconsistency and gaps in the FSS development and maintenance processes.** Experience within PSU includes the discussions with Policy and Standards Committee (PSC) and Policy Steering Group (PSG) during the assessment of Interim National Standard (INS), National Forest Stewardship Standards (NFSS) and Regional Forest Stewardship Standards (RFSS). Within PSU, experiences have been gathered along the transition and development of the 79 FSS to the new versions of the Principles & Criteria V5-2 and the International Generic Indicators (IGI) V2-0, the development of six new FSS, the first full scheduled revision of three NFSS, and eight partial revisions of NFSS. During the assessments, PSU found inconsistency and gaps in the 60 series normative documents for various types of FSS processes e.g., INS and NFSS. Among the critical issues identified in the revision of the 60 series normative documents there are: the gaps in specific requirements (for example, in the FSC-PRO-60-006 for the revision of FSS), the repetitive and not always aligned content among the requirements and within other normative documents, and the content that is not

always consistent with what a standard (STD) or a procedure (PRO) shall contain, as per the PSU-PRO-10-207 V1-0 EN *Document Control Procedure*.

2. **Advice Notes.** There are a few interpretations and advice notes published for development and maintenance of FSS. For example, INT-DIR-20-007\_13 on NTFP standards' advice, INT-STD-60-006\_01 for national interpretations, ADVICE-20-007\_01 on scope considerations, ADVICE-20-007-05 on NTFPs requirements, and ADVICE-60-006-01 on incorporation of new IGIs into FSS.
3. **Stakeholder feedback.** Feedback and experience from the stakeholders have provided additional inputs and impetus to review and revise the 60 series document. This includes feedback from certificate bodies (CBs) collected at the CB Meeting of 2021 session on INS. There, CBs expressed the need to clarify some of the requirements related to the INS development procedure.
4. **Streamline requirements and contribution to Strategy Goal 1.2.** The purpose of revising these documents is to have up-to-date, and consistent requirements on rules and procedures that facilitate the development, maintenance and ultimately, the implementation of user-friendly and high-quality FSS. The overall aim is to align FSS development processes to make them easier to implement and to have outcome oriented FSS that are effective, coherent and that demonstrate positive changes on the ground.
5. **Forest Management Community feedback.** Inputs collected from the Forest Network (now called Forest Management Community, FMC), developed in May 2020, aimed to compile, and summarize the regulations and practice for the implementation of new NFSS or INS. One of key gaps highlighted, and highly relevant, is the ambiguity around scope and use of FSC-PRO-60-006 for revision processes of the FSC Principles and Criteria (P&C) V5-2 NFSS (including unscheduled partial revisions to the NFSS) and some missing procedural requirements for the revisions of P&C V5-2 NFSS in FSC-STD-60-002 or FSC-STD-60-006.
6. **Alignment with other normative documents.** In the past five years, several guidance documents have been released which are directly relevant to the 60 series normative documents (e.g., FSC-GUI-60-002 on Scale, Intensity and Risk, FSC-GUI-60-009 on National High Conservation Value Frameworks, FSC-GUI-60-004 on National Thresholds for the Core Area of Intact Forest Landscapes within the Management Unit, FSC-STD-60-004 *International Generic Indicators*, etc.). Current revisions of other key normative documents (e.g., FSC-PRO-60-010 and its guidance on incorporation of a risk-based approach in NFSS, FSC-STD-01-003 on eligibility criteria for small and low intensity managed forest, FSC-STD-20-007 and associated addenda on forest management evaluations, FSC-PRO-30-011 on Continuous Improvement Procedure, FSC-PRO-01-001 *The Development and Revision of FSC Normative Documents*, etc.) are bringing new requirements into the revision of 60 series normative documents early next year. Other than this, the 60 series normative documents can be aligned with the relevant requirements and guidance provided in ISEAL Code of Good Practice for Setting Social and Environmental Standards.

The key elements for review and revision of the 60 series normative documents are categorized under the following seven broad issues (refer to the table in Annex for more details):

- 1) The Forest Stewardship Standards (FSS) and the FSC normative framework.
- 2) FSS content requirements.
- 3) Definition of dates and timelines for FSS.
- 4) FSS development process requirements.
- 5) Publication of FSS.
- 6) Maintenance of FSS.
- 7) Clarifications of FSS content.

These issues are intended to be the starting point for the revision process and can be expanded upon by other topics that might be identified and prioritized by the working group established for the revision through stakeholder feedback received during public consultation and recommendations from the PSC and the FSC Board of Directors (following FSC-PRO-01-001 V3-1).

Furthermore, the table in Annex is arranged by shared issues among the normative documents, rather than listing the specific issues per normative document. The reason for this approach is because PSU encourages a parallel revision of the 60 series normative documents that potentially fuses the four normative documents into one or two main reference normative documents for all standard and procedural requirements for development and maintenance of FSS.

In line with the justification and considering the period of validity of these normative documents, the PSU recommends initiating a revision process of the following four 60 series normative documents that could lead to full revision and/or the replacement.

	<u>Ending of period of validity</u>
FSC-STD-60-006 V1-2	1-Apr-2014
FSC-STD-60-002 V1-0	1-Jan-2015
FSC-PRO-60-006 V2-0	1-Jun-2020
FSC-PRO-60-007 V1-2	1-Oct-2021

Should the revision of these documents be recommended by PSC and approved by the FSC Board of Directors, a working group will need to be established.

### **III. Impact analysis**

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#### **Internal**

It is expected that the revision of other FSC normative documents will have relevant requirements that will impact the revision of the 60 series normative documents. Especially important are the new requirements from the revision process of the FSC-PRO-01-001 V3-1 EN *The Development and Revision of FSC Normative Documents* which is aimed to be finalized in 2022. The revision process of the 60 series normative documents will have to consider alignment with the related current FSC normative framework. Additionally, the revised normative requirements in these 60 series normative documents could lead to further updates of templates related to the registration, development, and approval processes of the FSS (e.g., process registration template, Transfer Matrix, Adaptation Records, user's manual, standard's template, etc.).

Once the 60 series are revised and effective, PSU foresees positive impacts on the FSS by making their development, implementation, and maintenance more user-friendly, clear, consistent, systematic, and efficient. PSU does not anticipate the proposed changes to put a heavy burden on a particular region or a network partner, but rather that it will contribute to streamlining the standards and procedures towards outcome orientation and ensuring balanced global consistency with local adaptability. This, in turn, will contribute to the achievement of the FSC Global Strategy 2021-2026 Strategy 1 to co-create and implement forest solutions.

PSU is confident that the revision of 60 series normative documents will enormously improve the review and revision processes of the FSS based on P&C V5-2 and will provide an overall stable set of requirements that will keep supporting the maintenance cycle of the FSS. Approximately 32 FSS (24 NFSS and eight INS) (~64 % of the total first FSS versions based on P&C V5-2 approved) could already start their review and revision processes following the revised 60 series normative document(s) in 2023.

FSC would need to provide training to reviewers and relevant stakeholders such as SDG coordinators, standards developers, etc. on the adoption of updated requirements and related templates for development, review, revision, and withdrawals of FSS.

### **External**

The impact is expected to be greater for standard developers (certification bodies as developers of INS and standard development groups (SDGs) for NFSS and RFSS) than for other stakeholders. This is considering the current number of FSS that can undergo review and revision processes (based on latest P&C V5-2) (see above). This number will likely increase in the coming years.

On one hand, the overall impact is expected to be positive in terms of more robust and consistent requirements and higher efficiency in the management because the revision process will have clear requirements throughout the process i.e., for registration, development, approval, publication, and the consequent maintenance of the FSS in the long term. On the other hand, the revised 60 series normative documents would result in increased workload and effort from the standard developers to align new FSS processes as per the new requirements.

It is expected the stakeholders will be more satisfied due to a more transparent, user-friendly, and stable and predictive processes of development and maintenance of FSS. SDGs, CBs, peer reviewers of FSS, experts, consultants, and FSC Independent Network Partners will benefit from more clear rules, roles and responsibilities, requirements and guidance for the development and maintenance of FSS. Certificate holders could also be positively impacted with the revised four normative documents from the 60 series.

Nevertheless, despite the efforts made to consider all feedback and align all four normative documents within each other and with other FSC normative documents, it is expected that some stakeholders might consider the revised normative documents are not properly aligned with all requirements or are not properly accounting all the realistic scenarios for development and maintenance of FSS.

## IV. Stakeholder consultation and feedback

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### i. Methodology

The relevant stakeholders for this process are those directly or indirectly impacted by the revision of the 60 series normative documents, namely standard developers, certificate holders, and CBs. FSC Independent Network Partners, Network Partners, FSC National Representatives, and Regional Offices are also expected to be affected due to their role in providing support during the development (including registration and approval) and implementation of the FSS in their regions. Other relevant stakeholders are FSC members from all chambers, organizations representing workers' interests, Indigenous Peoples, forest companies, governmental organizations, NGOs, international cooperation/development organizations, academic and research centers, and independent professionals.

Stakeholders were invited to provide comments and feedback on the draft 1-0 of the Review Report from 13 September 2021 until 12 October 2021 via the FSC Consultation Platform. To reach all relevant stakeholders to participate during consultation, the following methods were applied:

- Emails on CB Forum and the FMC mailing list.
- Direct emails to FSC Independent Network Partners and FSC National Representatives, PSC members, FSC Regional Directors and PSU Regional Managers.
- Announcements during meetings with the FSC Regional Directors and FMC.
- News item on the FSC network newsletter and portal.
- News item on the FSC members' newsletter and portal.
- News item on the FSC website and Branching Out.

Regarding the development of the consultation in the FSC Consultation Platform, the following types of questions were included to guide and enquire the participants:

- **Questions asking participants' general information.** Participants were requested to answer questions in the form of multiple-choice (mutually exclusive) and Yes/No questions (e.g., '1. Tick the description that best fits you: 'Have you participated in the development of FSC National/Regional standard(s)?)').
- **Questions asking level of agreement with the recommendations of the Review Report draft 1-0.** Participants were requested to answer questions in the form of multiple-choice (mutually exclusive) questions and open-ended questions (e.g. 'Do you agree with the identified impacts of the revision of the 60 series expressed in the draft 1-0 Review Report?, Add remarks, if any.', 'Do you agree with the recommendation of the draft 1-0 Review Report to revise FSC-STD-60-006 V1-2 Process Requirements for the Development and Maintenance of National Forest Stewardship Standards?, Add remarks If any.', 'Do you agree with the issues listed in the annex of the draft 1-0 Review Report?, Add remarks if any').
- **Questions requesting feedback on the issues listed in the Annex of the Review Report draft 1-0.** Participants were requested to answer questions in the form of Yes/No questions, multiple choice (collectively exhaustive) questions and open-ended questions (e.g. 'Are there main or specific issues not included in the annex that should be included in the Review Report?').

‘Please add the missing issues here (if possible, refer to the specific normative document of the 60 series).’, ‘Which of the main issues do you find most relevant to revise? (more than one answer is possible to select)’)

- **Questions requesting preferences on the format of the future revised 60 series.** Participants were requested to answer questions in the form of multiple-choice (collectively exhaustive) questions and open-ended questions (e.g., ‘Which of the following formats for the 60 series you find more suitable for future use? (More than one answer is possible to select)’, ‘Add remarks, if any’’).

For the analysis of the consultation results, the methods were as follows:

- Quantitative analysis of responses for Yes/No and multiple-choice questions to understand the feedback on general aspects of the draft Review Report. For example, percentage of respondents that agreed with the recommendation of the Review Report draft 1-0 to revise the standard FSC-STD-60-006 V1-2.
- Qualitative analysis of responses for open-ended questions to understand more detailed insights regarding, for example: remarks related to the recommendation of the Review Report draft 1-0 to revise the standard FSC-STD-60-006 V1-2, suggestions on new issues and specific issues not listed in the Annex, etc.

## ii. Results

### a) Participation

Between 13 September and 12 October 2021, 39 stakeholders enrolled themselves for the public consultation of the PSU Review Report draft 1-0 of the four normative documents of the 60 series. From those 39 stakeholders, 31 gave feedback in the public consultation. The responses from the 31 participants were considered for conducting the analysis of the public consultation results.

In general, participants from all the regions participated to the public consultation but participation from Europe (45%) was the highest. It is to note that Africa, Asia Pacific, and Commonwealth of Independent States (CIS) regions were only represented by two participants each, this is a considerable low representation given the number countries existing in those regions.

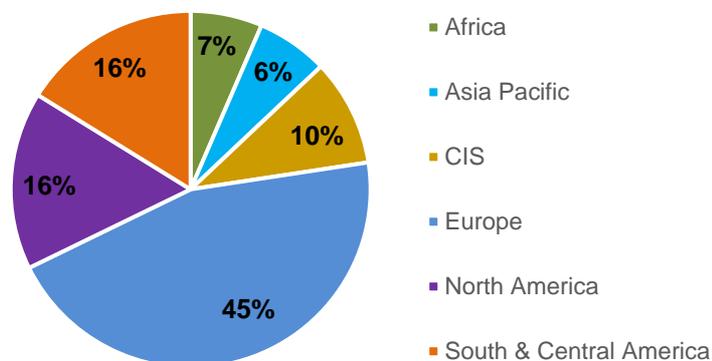
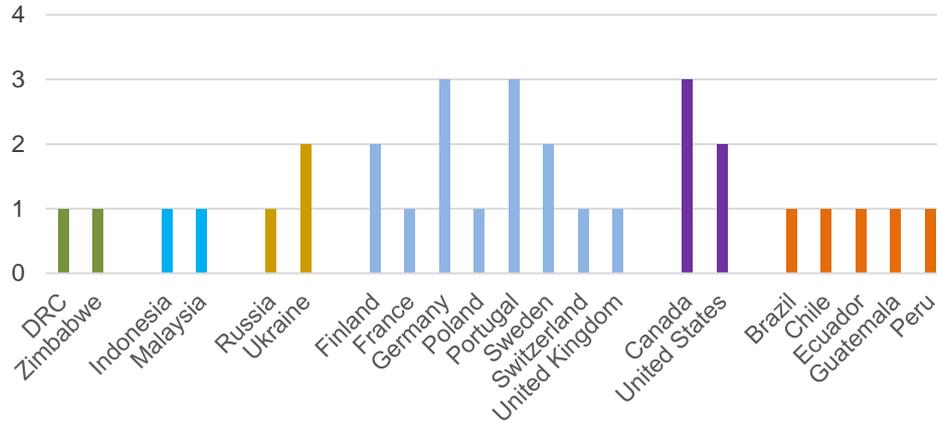
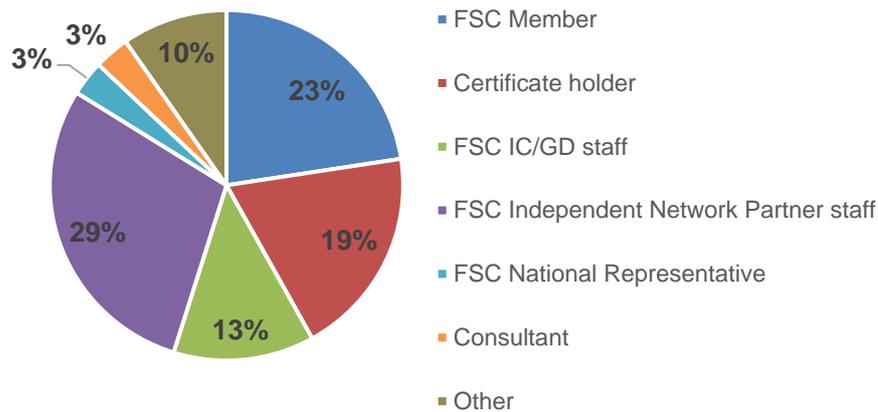


Figure 1. Representability of regions among consultation participants.

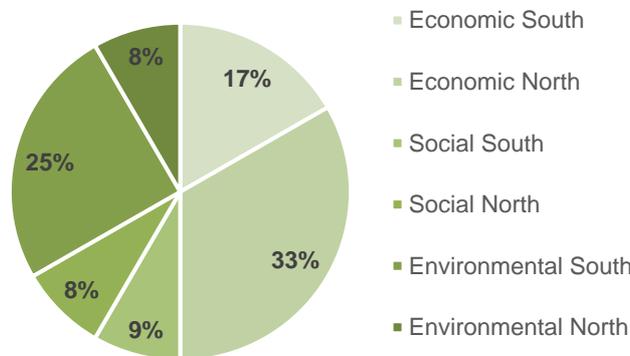


**Figure 2.** Representation of countries among consultation participants.

The participants contributing to the public consultation were the FSC Independent Network Partner staff (29%), FSC Member (23%), Certificate holder (19%), FSC IC and FSC GD staff (3% and 10% respectively). FSC members participating in consultation represented global South and North, as well as the three chambers: social, environmental, and economic.

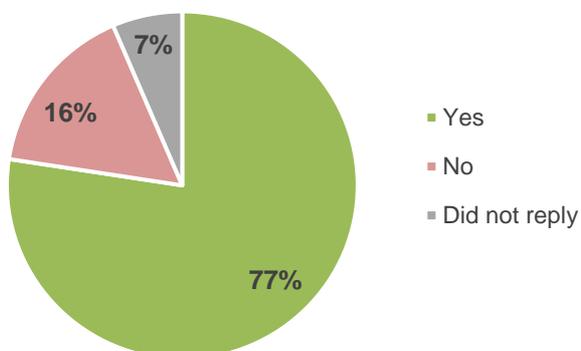


**Figure 3.** Stakeholder types that participated during consultation.



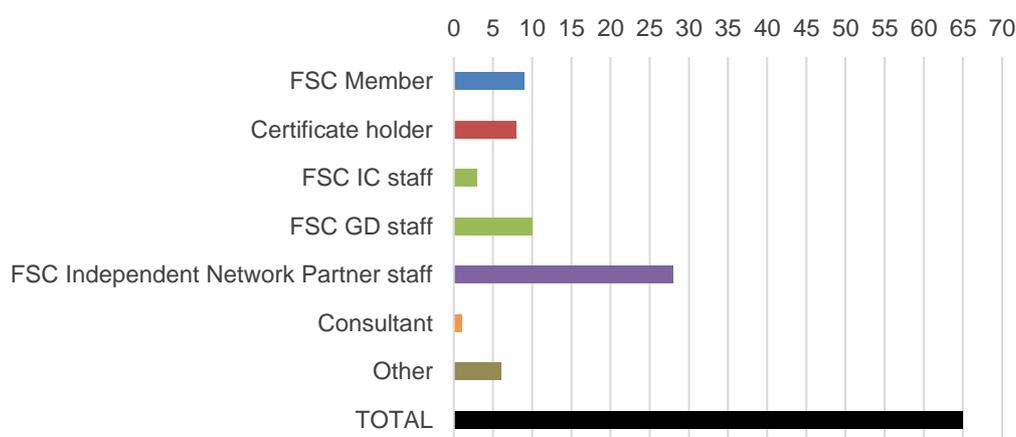
**Figure 3.** Chamber representation of FSC Members during consultation.

It is important to highlight that, of total participants 77% of the participants claimed to have participated in the development of FSC National/Regional standard(s). This suggests that most of the comments and feedback gathered by this stakeholder consultation is built up on first-hand experiences with the use of 60 series normative documents.



**Figure 4.** Participants with FSS development experience

1. A total of 65 additional remarks and comments were received. The changes done in this final Review Report have been based on the relevant and appropriate comments received from the public consultation. The following figure summarizes the number of relevant stakeholder comments received.



**Figure 5.** Number of received comments/remarks per type of stakeholder.

***b) Main findings***

The participants contributing to the public consultation generally agreed to content, drivers, impacts and recommendation for the review of FSC-STD-60-006 V1-2, FSC-STD-60-002 V1-0, FSC-PRO-60-006 V2-0 and FSC-PRO-60-007 V1-2. The participants, who have been involved in standard development process, supported that the content, requirements, and procedures under the 60 series normative documents need revisions based on their own experiences and lesson learnt. A synopsis of the

major findings and analysis of comments received during the public consultation is outlined below:

1. *None of the participants disagreed with the drivers for the revision process of the 60 series expressed in the draft 1-0 Review Report.*

Out of the 31 participants, 23 (74%) expressed full agreement, six (19%) expressed to partially agree and two (6%) did not reply to the question. Most of the comments referred to the drivers being focused on the need to improve the development and maintenance processes for the FSS but missing the need for improvement of the content in the FSS themselves, especially the need to define requirements to make the FSS outcome oriented, user-friendly, etc. as per the intent of the Strategy Goal 1.2 of the Global Strategy.

2. *None of the participants disagreed with the impacts from the revision process of the 60 series expressed in the draft 1-0 Review Report.*

Out of the 31 participants, 16 (52%) expressed full agreement, 13 (42%) expressed to partially agree and two (6%) did not reply to the question. Most of the comments referred to the impacts' section missing mention of: 1) the potential threats to approved FSS if new requirements would trigger the need for their revision, 2) the impact regarding the how and when FSS are implemented on the ground by certificate holders and other practical executors of the 60 series; but also the impact on standard developers, in specific 3) the potential opposition among SDGs to implement changes in process requirements.

3. *None of the participants disagreed with the recommendation in the draft 1-0 Review Report, to revise the four normative documents of the 60 series.*

Most of the participants agreed with the recommendation to revise the 60 series normative documents. Main comments for the FSC-STD-60-006 referred to the need to update with recent changes in other normative documents. There were two comments for the FSC-STD-60-002, about revising the FSS scope requirements and other aspects that increase complexity. For the FSC-PRO-60-006 the main comments referred to the need to revise the role and use of International Generic Indicators (IGIs) in revision process of FSS. For the FSC-PRO-60-007 only one comment regarding need to simplify the procedure was received.

**Table 1.** Level of agreement with the recommendation to revise the 60 series.

	Effective responses	Agree.	Partially agree.	Disagree.
<b>FSC-STD-60-006</b>	27	96%	4%	0%
<b>FSC-STD-60-002</b>	26	92%	8%	0%
<b>FSC-PRO-60-006</b>	27	74%	26%	0%
<b>FSC-PRO-60-007</b>	25	80%	20%	0%

4. *None of the participants disagreed with the issues listed in the annex of the draft 1-0 Review Report, as starting point for the revision of the four 60-series normative documents.*

Almost 84% supported the listed issues, while the 16% did not reply. More than half (~58%) of the respondents that agreed with the listed issues, also stated that the annex was complete, not missing any important issue; nearly one-third (~35%) indicated the annex was missing issues and the remaining (~8%) did not comment. In general, comments did not indicate disagreement with any of the issues in the annex.

Among the issues indicated as missing in the annex, there were process- and content-related issues. Regarding the process-related issues, some included the role of IGIs in review and revision processes, description of PSU approval process, other possible process' deviations of the due dates, definition of the role of PSU during development of FSS, etc. Among the content-related issues, some referred to the definition of specific approach and requirements for SLIMF, key aspects of PSU assessment of final FSS drafts, etc. There were two issues that were notably a shared concern among some stakeholders, were related to the proposed regional calibration requirement and the clarity of the PSU assessment and approval process.

It is important to highlight that some of this feedback has not been directly included in the annex of final of the Review Report. PSU will provide the technical working group in charge of the revision of the 60 series, with the list of all the comments received

5. *All main issues listed in the annex of the draft 1-0 Review Report were mostly indicated as important issues for the revision of the four documents of the 60 series.*

All seven main issues listed in the annex of the draft 1-0 Review Report were recognized by 33% of the total participants, as important issues to consider in the revision process (see Table 2). Special recognition was also given to the following main issues: FSS content requirements, FSS and the FSC normative framework, and the definition of key dates and timelines for FSS.

**Table 2.** Recognized importance per main issue in the annex of draft 1-0 Review Report.

Main Issue 1: The Forest Stewardship Standards (FSS) and the FSC normative framework.	20%
Main Issue 2: FSS content requirements.	30%
Main Issue 3: Definition of dates and timelines for FSS.	17%
Main Issue 4: FSS development process requirements.	0%
Main Issue 5: Publication of FSS.	0%
Main Issue 6: Maintenance of FSS.	0%
Main Issue 7: Clarifications of FSS content.	0%
All the above.	33%

Note: the percentage is based on 30 effective responses or effective "selections" by the participants. The participant could select more than one the options from the table. 26 participants (84%) replied to this question.

6. *Majority of the participants (74%) supported that the four normative documents should be merged to become more suitable for use and alignment with other normative documents.*

42% of participants of the public consultation suggested that the most suitable format for the revised 60 series normative document is one single normative document, while only 23% of the participants preferred to have one main standard and one main procedure and 10% considered these two options to be the most suitable for future use. The current four normative documents format was supported by one (3%) participant and another participant (3%) expressed any other format would be more suitable but when adding details to this selection, the participant referred to one single document. The rest of the participants (19%) did not reply to this question.

## V. Annex – Aspects to be considered for revision

The key issues identified for the revision of FSC-STD-60-006 V1-2, FSC-STD-60-002 V1-0, FSC-PRO-60-006 V2-0 and FSC-PRO-60-007 V1-2 are indicated in the table below. These issues are intended to be the starting point for the revision process and can be expanded upon by other topics that might be identified and prioritized by the working group established for the revision, through stakeholder feedback received during public consultation and recommendations from the PSC and the FSC Board of Directors (following FSC-PRO-01-001 V3-1).

(NOTE: Aspects are identified following the requirement under Section 9.5 of FSC-PRO-01-001 V3-1 EN Development and Revision of FSC Normative Documents)

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - “What is allowed”	Elements missing in procedures to define: - “How, by whom, when”, towards the “what”
Main issue 1: FSS and the FSC normative framework			
1.1 FSS requirements vs. FSC normative framework, and trigger to revision (full or partial) of FSS	FSC-STD-60-006: 13, 14, 16 FSC-STD-60-002: 2 FSC-PRO-60-007: Part 2	Need to revise to include the relation between FSS and the international normative requirements. Need to include general rules of requirements when FSS requirements are conflicting with international normative documents or are inconsistent with other parts of the normative framework of FSC. Here it is also needed to define the conditions required for when such inconsistencies trigger a revision (full or partial) of an FSS.  Part of this revision should include the update of all references to Principles and Criteria (P&C). For example, the title of the FSC-STD-60-002 is outdated in the sense that it refers to the P&C version 5-1, this version is not the latest one.	<i>(Expected that the relevant procedures would be defined/ revised, wherever found essential, during the revision process.)</i>
1.2 Normative hierarchy rank of types of clarifications on FSS	FSC-STD-60-006: 13, 14, 16 FSC-STD-60-002: 2 FSC-PRO-60-007: Part 2	Need to define what other normative documents are stating additional specific requirements or are replacing some specific requirements in the 60 series and in the FSS. Need to clarify and describe the role and rank of the different types of clarifications on FSS (advice notes, national interpretations, etc.) within the "hierarchy" of FSC normative documents. Also, to	<i>(Expected that the relevant procedures would be defined/ revised, wherever found essential, during the revision process.)</i>

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		clarify if new national interpretations and advice notes supersede FSS requirements. Plus, include references to relevant normative documents, such as the document control PSU internal procedure PSU-PRO-10-207.	
Main issue 2: FSS content requirements			
2.1 FSS typologies	FSC-STD-60-006: All FSC-STD-60-002: All FSC-PRO-60-006: All FSC-PRO-60-007: All, inclusive	Need to revise and generate clear exclusive definitions of each one of the types of FSS and the content and process requirements for each one of them (e.g., the dropping or the addition of new indicators is not allowed in any INS nor IRS). Need to clarify under which conditions each one of the specific FSS are allowed to be developed (e.g., minimum criteria for considering a country eligible to GFSS process, criteria for applicability to INS and IRS process, etc.).  Need to include a general introductory section and updated glossary of terms where all the types of possible FSS are characterized (e.g., diagram showing all types of FSS: NTFP standards, SLIMF standards, INS-TWG based, INS-GFSS based, NFSS P&C V4, NFSS P&C V5-2, low complexity NFSS, RFSS, IRS, revised NFSS, etc.). That section could clearly reference the clauses or sections in the 60 series relevant to each FSS. In this sense, for low complexity NFSS, it is needed also to refer to or to add the content from the FSC-PRO-10-607a which states the criteria to determine low complexity NFSS.	<i>(Expected that the relevant procedures would be defined/revised, wherever found essential, during the revision process.)</i>
2.2 Codes' assignment per types of FSS	FSC-STD-60-006: 8.1, 12.1 FSC-STD-60-002: Annex 1 FSC-PRO-60-006: 1 FSC-PRO-60-007: Part 1	Need to improve/include requirements for the coding for the new and revised FSS (scheduled and unscheduled) and to improve the reference to such instructions in the 60 series.	<i>(Expected that the relevant procedures would be defined/revised, wherever found essential, during the revision process.)</i>

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		<p>Need to revise the code structure as well and explore ways to better align the FSS codes with the coding system of the other normative documents in FSC (align with FSC-PRO-01-001). An aspect related to this is to review the proposal of using “NFSS”, “INS” or “FSS” to replace the “STD” of the codes on the FSS.</p> <p>More specific detail in Annex 1 of FSC-STD-60-002 is needed for the instructions on the coding of FSS. For example, the instructions on how to define the “description” in the code of the FSS in this annex need to: 1) clarify when a description should not appear in the code (and give clear examples); 2) explain what the “description” in the code should describe (e.g. type of forest, region/sub-region, type of organizations, classification of management units such as small units, SLIMF, etc.); 3) instruct if the description should be in Spanish language, when the official approved version of the FSS is in Spanish (and add several examples).</p> <p>Need to indicate the requirements for the codes of FSS that only cover territories of countries that are overseas (e.g., New Caledonia, French Guiana, Puerto Rico, etc.). Need to examine whether it is necessary to label FSS using word ‘National’, for instance National Forest Stewardship Standard (NFSS) and Interim National Standard (INS) can be called as Forest Stewardship Standard (FSS) and Interim Forest Stewardship Standard (IFSS) instead.</p>	
2.3 Tools for the registration and development of the FSS	FSC-STD-60-006: 8 FSC-STD-60-002: 3 FSC-PRO-60-006: 1 FSC-PRO-60-007: 2, 6, 11	Need to define per type of FSS, which are the required tools for registration and development (e.g., templates, specific indicators files, guidance, etc.) and to explicitly indicate that the latest versions of the template for the standard, the Adaptation Records	Related to these requirements, it is also important to consider naming the similar templates by the same name. For example, the template for recording the adoption, adaptation, dropping and addition of new indicators and

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		<p>(for INS and IRS) and the Transfer Matrix (for NFSS and RFSS) shall be used and filled in during the development of the FSS. In this sense, the note under clause 14.1 of FSC-PRO-60-007 needs to be revised, to clarify that the GFSS-based INS shall use the FSC-STD-60-004 V2-0 IGIs and the INS template as starting point, the same as a TWG process. The main differences between both types of INS should rely in the process requirements and the list of IGIs that are mandatory to be adapted.</p> <p>In addition to the aspects mentioned above, detailed requirements need to be explained to clarify that the Adaptation Records and Transfer Matrices are to record all the adaptations made to the templates (all sections of the standard, not just the indicators) and are part of the list of supporting documents that must be used and submitted to PSU together with the INS ‘pre-approval’ draft.</p>	<p>justifications during NFSS development process is called Transfer Matrix but similar template for INS is called Adaptation Records. These templates could have the same name since they are basically used for the same purpose.</p> <p>Additionally, need to specify a validity period and a procedure for developing and updating the templates (e.g., how often a new version of the template is expected to be developed and approved) with the requirement for FSS to use the most updated versions of the templates in the next scheduled revision. Roles and responsibilities for the development and maintenance of templates also needs to be defined. The kind of legal agreements that apply to each case also needs to be defined (e.g., when CBs have their own funding for the development process, they would need a cooperation agreement with PSU, otherwise a service agreement would be required).</p> <p><i>(Other relevant procedures would be defined/revised, if found convenient during the revision process.)</i></p>
2.4 Alignment of content with templates	FSC-STD-60-006: 8 FSC-STD-60-002: 3 FSC-PRO-60-006: 5-6 FSC-PRO-60-007: 2	<p>Need to align the sections of the 60 series that refer to the content inside the FSS with how the content is presented in the latest versions of the templates for the FSS.</p> <p>For example, in the case of the FSC-PRO-60-007, now that the INS template has been updated and first sections of the INS have been modified, the section 2 ‘Content’ of this procedure needs to be revised and modified accordingly to correct inconsistencies. Another example of inconsistency is with the new</p>	<p><i>(Expected that the relevant procedures would be defined/revised, wherever found essential, during the revision process.)</i></p>

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		<p>section B ‘Context’ of the INS template, which contains a general description of the forestry sector. The information about the background information on the standard development is part of this section, not of the preamble (as currently stated in the procedure). Clauses 2.1.5 and 2.1.1 of the FSC-PRO-60-007 are inconsistent with the latest and improved INS template.</p>	
2.5 HCV framework requirements	<p>FSC-STD-60-006: 8 FSC-STD-60-002: 3 FSC-PRO-60-006: 5-6 FSC-PRO-60-007: 2</p>	<p>Need to define the requirements for the HCV framework inside the FSS. Along with the definition of requirements, the scope that the HCV framework can have should be clarified (e.g., national, subnational, regional, etc.) and under which cases each scope shall be used. Need to define the basic mandatory sections an HCV Framework shall contain (e.g., overarching Best Available Information, interpretations for HCV identification, methodologies for assessment of HCVs, strategies for maintaining and enhancing HCVs, monitoring of HCVs). Need to make explicit reference to the normative aspects in FSC-GUI-60-009 V1-0 <i>EN Guidance for Standard Development Groups: Developing National High Conservation Value Frameworks</i>.</p>	<p>Need to clarify that the FSC-GUI-60-009a <i>Template for National High Conservation Value Frameworks</i> shall be considered when developing National HCV Frameworks as per section 1.5 on the normative aspects in FSC-GUI-60-009 V1-0 <i>EN Guidance for Standard Development Groups: Developing National High Conservation Value Frameworks</i>. Also, need to define how these HCV frameworks shall be developed, by whom and in which part of the development process of an FSS.</p>
2.6 SLIMF requirements	<p>FSC-STD-60-006: 8 FSC-STD-60-002: 6 FSC-PRO-60-006: 5 FSC-PRO-60-007: 2, 3</p>	<p>Need to clarify the requirements to define valid specific SLIMF types, which can include both or just one of the two eligibility criteria (scale and intensity) within the scope of applicability. Need to clarify on the different types of SLIMF depending on the different types of forests, regional conditions, etc. Need to clarify how FSC-STD-01-003 applies to each one of the different types of FSS and the requirements related to the numbers of SLIMF categories in one single FSS.</p> <p>Need to clarify how the indicators work when SLIMFs are part of the scope of applicability of the FSS. For</p>	<p>Need to define formal procedures on how to develop specific SLIMF indicators for FSS, including who develops and who approves them.</p> <p><i>(Other relevant procedures would be defined/revised, if found convenient during the revision process.)</i></p>

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		<p>example, for INS, when including SLIMF in the scope, all the indicators, not only the specific SLIMF indicators, apply to SLIMF.</p> <p>Revisions may also be required to bring alignment with revised FSC-STD- 01-003.</p>	
2.7 NTFP requirements	<p>FSC-STD-60-006: 8  FSC-STD-60-002: 1, 3  FSC-PRO-60-006: 5-6  FSC-PRO-60-007: 2.4</p>	<p>Need to clarify and align between FSS types how the indicators work when NTFPs are part of the scope of applicability of the FSS. For example, for INS, when including NTFPs in the scope, all the indicators -not only the specific NTFP indicators- apply.</p> <p>Need to analyze Advice Note ADVICE-20-007-05 <i>Non-Timber Forest Products</i> to revise the process for developing NTFPs requirements and integrate such a revision to the content of the 60 series. In addition to this, there are some interpretations (like INT-DIR-20-007_13 dated 3 December 2018) to be included in the 60 series normative document if needed.</p> <p>Also, to explore if for NTFPs, there could also be thresholds for defining size and intensity of the management (e.g., impacts could not be the same when NTFPs are collected than when harvested, and area size of the collection/harvest could also play a role).</p>	<p>Need to define formal procedures on how to develop specific NTFP indicators for FSS, including who develops and who approves them.</p> <p>For INS, in addition to the missing formal procedures on how to develop specific NTFPs, it is also not clear how to use the NTFP indicators (adaptations of the normal IGI made in PSU) that are in the INS template as proposals.</p> <p><i>(Other relevant procedures would be defined/revised, if found convenient during the revision process.)</i></p>
2.8 non-applicability of principles and indicators	<p>FSC-STD-60-006: 8  FSC-STD-60-002: 3, 4  FSC-PRO-60-006: 2, 3  FSC-PRO-60-007: 2, 3</p>	<p>Need to explain that non-applicability of principles or indicators could be allowed only for certain cases and when properly justified depending on the country context. This is especially relevant for the indicators under Principle 3 where a justification is needed for confirming no-presence of Indigenous Peoples (IPs) in a country/region based on seven criteria for identifying IPs according to FSC. The previous is also especially relevant for the indicators under Principle 9 related to Intact Forest Landscapes.</p>	<p><i>(Expected that the relevant procedures would be defined/revised, if found essential/convenient during the revision process.)</i></p>

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2.9 Copyrights, rights to use and ownership	FSC-STD-60-006: 5.3, 8, 11 FSC-PRO-60-007: 8	Need to specify FSS’ content copyrights and ownership rights considerations as per the FSC representation in the area (e.g., when there is an Independent Network Partner in the country or region of the FSS’ scope) and considerations to use the content by third parties as well, including the translated unofficial versions of the FSS.  Also, to consider the rules for the transmission of such ownership and maintenance rights (e.g., from a dissolving SDG or National Office to FSC IC, etc.) but also to transfer the use and copyrights. The maintenance rights would include review/revision processes and development of FSS interpretations.	<i>(Expected that the relevant procedures would be defined/revise, if found essential/ convenient during the revision process.)</i>
2.10 General Data Protection Regulation (GDPR)	FSC-STD-60-006: All FSC-STD-60-002: All FSC-PRO-60-006: All FSC-PRO-60-007: All	Need to incorporate GDPR considerations throughout the rules and processes that relate to the management of personal data. Perhaps include the rule of adding a “consent disclaimer” from the authors of any document or recommendation letter that is submitted to PSU-FSC. Specific attention is needed in sections related to publication of FSS (e.g., requirements for giving consent for the photo cover credit box, for the display of SDG member’s name and affiliations, etc.)	<i>(Expected that the relevant procedures would be defined/revise, if found essential/ convenient during the revision process.)</i>
2.11 Normative and non-normative content in FSS	FSC-STD-60-006: 8 FSC-STD-60-002: 3 FSC-PRO-60-006: 1 FSC-PRO-60-007: 2	Need to clarify which are required sections in the FSS and their normative or informative character. Need to check for consistency with section 8 content in FSC-STD-60-006.	<i>(Expected that the relevant procedures would be defined/revise, if found essential/ convenient during the revision process.)</i>
2.12 Regional calibration of contents	FSC-STD-60-006: 8 FSC-STD-60-002: 3-4 FSC-PRO-60-006: 1-2 FSC-PRO-60-007: 2-3	Need to include a provision that requests the standard developers to calibrate the content of the FSS against other FSS (or if FSS doesn’t exist, against the context) of the neighboring countries	Need to define the roles and responsibilities for the regional calibration of content in the FSS (e.g., identify what kind of guidance PSU can facilitate the standard developers to support such calibration).

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - “What is allowed”	Elements missing in procedures to define: - “How, by whom, when”, towards the “what”
		within the region. Clarify the requirements for developing such regional calibration.	
2. 13 References to other FSC normative documents	FSC-STD-60-006: All FSC-STD-60-002: All FSC-PRO-60-006: All FSC-PRO-60-007: All	Need to update the reference section, as applicable. Besides, need to include the reference to the normative requirement to follow specific procedures existent in other normative documents that refer to development of the content of the FSS (e.g., Annex 4 of FSC-POL-30-001 on procedure to implement policy requirements for ESRA framework at national level).	<i>(Expected that the relevant procedures would be defined/revised, if found essential/convenient during the revision process.)</i>
2.14 Ecosystem Services considerations	FSC-STD-60-006: new section FSC-STD-60-002: new section FSC-PRO-60-006: 6 FSC-PRO-60-007: new section	Need to update the whole section 6 of FSC-PRO-60-006 to clarify the connection between the normative requirements in these 60 series regarding the Ecosystem Services and the requirements in the FSC-PRO-30-006 <i>Ecosystem Services Procedure: Impact Demonstration and Market Tools</i> . And add clarification on how both requirements need to be met to allow the certificate holders to access to FSC Ecosystem services claims.	Define the role of the FSS in the FSC Ecosystem Services Claims and define the related aspects that are necessary for the standard developer to consider during the development of the FSS. <i>(Other expected relevant procedures would be defined/revised, if found convenient during the revision process)</i>
2.15 Specifying scope for FSS	FSC- STD-60-002: 1.1	Need to elaborate on requirements for determining the scope of the FSS. For example, inclusion of NTFPs, SLIMFs, forest types, definition of production systems (very short rotation tree crops, agroforestry model, etc.) should also be considered when defining the scope (as per ADVICE-20-007_01).	<i>(Other expected relevant procedures would be defined/revised, if found convenient during the revision process)</i>
<b>Main issue 3: Definition of dates and timelines for FSS</b>			
3.1 Approval date, publication date, effective date, transition period, validity period and withdrawn date	FSC-STD-60-006: 11-12, 15 FSC-STD-60-002: 8 FSC-PRO-60-006: 1.10, 8 FSC-PRO-60-007:10, 10.2, 12.2	Need to: 1) Clarify the requirements per possible type of FSS (V1-0, full/partial revised, etc.) for defining approval, publication, and effective dates, including the period between these dates and	<i>(Expected that the relevant procedures would be defined/revised, if found essential/convenient during the revision process.)</i>

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - <i>“What is allowed”</i>	Elements missing in procedures to define: - <i>“How, by whom, when”, towards the “what”</i>
		<p>transition and validity periods. For example, the deadlines for publication of FSS, within 3 months from the date of approval (or the day when last condition is closed in case of conditional approvals). As a starting point, there is a complete definition of transition period already explicit in the latest version of the INS template.</p> <ol style="list-style-type: none"> <li>2) Rethink if requirements for deviations in the key dates (e.g., validity period) could be relevant to define for some types of FSS (e.g., for INS, for which PSU runs the review and revision process).</li> <li>3) Define the requirements for when automatic replacement (withdrawal date) of the older version applies (e.g., by partial editorial revisions' publication date).</li> <li>4) Align with FSC-PRO-01-001 or provide justification for special deviation applicable to FSS in these requirements.</li> <li>5) Have somewhere clearly defined the transition period duration and its relation to the deadlines to audit against the requirements of the old revised FSS, is highly useful when FSS do not have a specific transition period written in it.</li> </ol>	
3.2 Submission date	FSC-STD-60-006: 10	Need to set clear description on what is formally recognized as the final “submission date” in PSU. In the description, it needs to be clarified that this date is when the submission to PSU is complete (as per all the documents needed, including the field test report) and has been sent directly to PSU Bonn (not to PSU Latin America Regional Office, etc.).	<i>(Expected that the relevant procedures would be defined/revised, if found essential/ convenient during the revision process.)</i>
3.3 Definition of next scheduled revisions for revised FSS	FSC-STD-60-006: 12 FSC-PRO-60-007: 10	Need to clarify and specify per type of FSS how the next (scheduled, not scheduled, partial editorial,	<i>(Expected that the relevant procedures would be defined/revised, if found essential/ convenient during the revision process.)</i>

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - <i>“What is allowed”</i>	Elements missing in procedures to define: - <i>“How, by whom, when”, towards the “what”</i>
		<p>partial content, first, second, etc.) review/revision processes shall be defined.</p> <p>For example, in the FSC-PRO-60-007, clause 10.2 states that INS will be reviewed by PSU on a five-year cycle, and because of the review process, PSU will either extend the validity of the INS or initiate a revision process, which means that the revision process would start only after five years (i.e., not before). For NFSS, clause 12.3 in FSC-STD-60-006 states that review and possible revision processes need to be finalized by the end of the validity period of the NFSS, which is normally approved as being five years.</p>	
3.4 Transition period requirements	<p>FSC-STD-60-006: 11  FSC-STD-60-002: 8.2  FSC-PRO-60-006: 8  FSC-PRO-60-007: 9.2,12.2</p>	<p>Need to clarify the status and the allowed uses of the FSS during the transition period (e.g., when used for surveillance audit).</p> <p>To clarify for FSS, the general rule for FSC normative documents is that “by the end of the transition period all Certificate Holders and applicants for certification shall have been evaluated against the revised normative document” (12.3, FSC-PRO-01-001). This means that to maintain the certificate, the first audit against the new version shall happen before the end of the transition period. Before this first audit against the new version, the certificate holder can have audits against the old standard even when the new version has become valid.</p> <p>Another aspect is to improve “outcome oriented”-ness of the FSS, to identify how revised FSS shall be used in case of a surveillance audit by referencing relevant clauses of FSC-STD-20-007.</p>	<p><i>(Expected that the relevant procedures would be defined/ revised, if found essential/ convenient during the revision process.)</i></p>

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - <i>“What is allowed”</i>	Elements missing in procedures to define: - <i>“How, by whom, when”, towards the “what”</i>
3.5 Transition period and <i>“significantly changed requirements”</i>	FSC-STD-60-006: 12 FSC-PRO-60-006: 3,8 FSC-PRO-60-007: 10	<p>Need to explore and clarify the criteria for defining “significantly changed requirements” during a revision of an FSS and to clarify what the content of the FSS needs to include in terms of consideration for the phase-in of these changes in requirements while the transition period is ongoing.</p> <p>The general rule is that the certificate holder shall conform with all FSC criteria at any given time. For some new or <i>significantly changed requirements</i> it may be hard for the certificate holder to conform within the first year, and even within two years.</p> <p>This can be accounted for in the FSS by including phase-in requirements: i.e., a plan for implementing the requirement may be sufficient to conform. This has been possible for added indicators, i.e., indicators that are not IGIs. The FSC view has been that these requirements are not necessary for conforming with the criteria.</p> <p>Since the IGI are a set of indicators that address each normative element of each criterion in the FSC Principles &amp; Criteria, these requirements shall be conformed with by the certificate holder at any given time. Therefore, phase in mechanisms/procedures for IGIs has generally not been allowed. However, there are exceptions when this has been allowed, e.g., the NFSS for Canada uses interim indicators. This is when conformance of the requirements may be beyond the control of the certificate holder or where there are process requirements that cannot be achieved within a year. These exceptions as well as the process steps required to reach the requirements have to be considered in the 60 series.</p>	<i>(Expected that the relevant procedures would be defined/ revised, if found essential/ convenient during the revision process.)</i>
Main issue 4: FSS development process requirements			

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - <i>“What is allowed”</i>	Elements missing in procedures to define: - <i>“How, by whom, when”, towards the “what”</i>
4.1 FSS-type specific deviations	FSC-STD-60-006: All FSC-STD-60-002: All FSC-PRO-60-006: All FSC-PRO-60-007: All	<p>Need to explicitly include the specific deviations (in content and process) applicable per type of FSS per section or requirement. Need to include outstanding deviations in the content and process requirements when the type of FSS process changes during the development of the standard (e.g., an FSS process which was registered and initially developed as NFSS, but later switched to an INS process. Under this scenario, what are the differences for field testing and all other requirements).</p> <p>An idea is to provide a summary table with references to the specific clauses, of requirements and their applicability per type of FSS (similar to how online stores compare different products against the same characteristics, by ticking the characteristics that apply to each one of them and adding specifications in small letters).</p> <p>For example, for FSC-PRO-60-007, several updates and alignments are needed such as:</p> <ul style="list-style-type: none"> <li>a) need to revise all the specific requirements for GFSS process that are in turn deviations from the TWG process to make sure the original purpose of GFSS is clearly fulfilled (less complexity in requirements and procedures than TWG). For example, clarify if stakeholder meetings are or are not mandatory (clauses 14.2 and 14.4).</li> <li>b) need to clearly define mandatory adaptation of indicators for TWG and GFSS. In the Annex 2 there is a minimum list of IGI's requiring mandatory adaptation, but it does not differentiate between TWG and GFSS based processes, although there are differences. In GFSS processes the number of IGI's that require mandatory adaptation are less. This instruction is</li> </ul>	<p>Need to explicitly include the specific procedural deviations applicable per type of FSS per section or requirement.</p> <p>An idea is to provide a summary table, with references to the specific clauses, of procedures and its applicability per type of FSS (similar to how some online stores compare different products under the same characteristics by ticking the characteristics that apply to each one of them and adding specifications in small letters).</p> <p>It is critical to review the following in FSC-PRO-60-007:</p> <ul style="list-style-type: none"> <li>a) the case of the GFSS process deviations. Clauses like 5.2 are found confusing and do not clearly state guidance on when the adaptation of the indicators to the national context is allowed.</li> <li>b) it is also not clear how to use the SLIMF and NTFP indicators (adaptations of the normal IGI made in PSU) that are in the INS template as proposals; and it is also missing the formal procedures to develop other NTFP and SLIMF indicators. For example, PSU has developed specific indicators that are now asked to be incorporated to the INS if applicable. These indicators are two for indicator 8.5.1 (specific indicators for honey and venison), and there are four additional indicators under criterion 6.6 for when in the region, hunting is threatening species. Similarly, PSU also has</li> </ul>

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		<p>only found in the Adaptation Records (Excel document) and in the GFSS user manual (which is outdated and would need review as well) but needs to be explicitly clear in section 3, 14 and Annex 2. Additionally, need to identify if we need to include/establish criteria for considering justifications as acceptable for not adapting mandatory indicators, or criteria for determining the quality of an INS based on adaptation of indicators (e.g., minimum percentage of adapted indicators, among others).</p> <p>c) need to explicitly clarify in clause 3.3 and 14.1 at least, that the dropping or the addition of new indicators is not allowed in any INS (GFSS and TWG-based also in IRS), with the exceptions of indicators 8.5.1 and criteria 6.6 (which is explained in the column to the right).</p> <p>d) review and clarify in general all exceptions that are confusing (e.g., in clause 14.1 and its note, 14.2).</p> <p>e) need to redefine requirements for considering a country applicable to GFSS.</p> <p>Another need is to include the deviations for low complex NFSS at least in reference to the FSC-PRO-10-607 which includes these considerations.</p> <p>Similarly, for the NTFP standards, all requirements need to be clarified in the 60 series. The Advice Note ADVICE-20-007-05 <i>Non-Timber Forest Products</i> (at least bullet points 4 to 6) contains descriptions and requirements on how to develop and approve an NTFP standard. This Advice Note (which was developed during the period when P&amp;C V4 were valid) needs to be revised in parallel and the revised NTFP requirements (including NTFP standard</p>	<p>prepared a list of recommended (not mandatory) NTFP indicators for honey and animal products and other edible NTFP. The procedure to formally add specific indicators in INS needs to be clear, because in INS adding or dropping of indicators is not allowed.</p> <p>c) the list of common expenses that PSU can finance for the development of INS processes (clause 4.10). Currently, PSU finances the hiring of a local expert for specific topics (e.g., stakeholder engagement, etc.), but it does not appear in the procedure. Also, it is recommended to analyse if PSU could finance the travel expenses of CBs in case the countries are large and far from the CB’s nearest offices. This would be to encourage their participation leading the INS development process.</p> <p>d) the reference in clause 3.4 for standard developers to use the FSC National Risk Assessment or the Centralized National Risk Assessment when available. The reference lacks detail on how to use the FSC Risk Assessments during the development of the INS.</p> <p>e) clarification of when field testing is valid for specific INS processes.</p> <p>f) Clarification on how to register an INS when CBs are not interested on registering the INS development process (e.g., how PSU or a National Office can request the process’ registration)</p>

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		development and approval) need to be integrated to the content of the 60 series.	<p>g) another clarification is needed for the deviations on INS approval procedures. Specifically, to align the 60 series with the FSC-PRO-10-607 <i>Approval of Interim National Standards (INS) and low complex National Forest Stewardship Standards (NFSS)</i> and clarify when an INS is presented for approval to PSG and when to PSC and the specific path towards final approval and publication.</p> <p>h) Additional guidance is needed for SDs in regards of the type of deviations allowed according to each case. An idea on how to address this is that, SDs can submit an interim report before the first public consultation, in which they highlight all the major process and content deviations for the development of the draft 1-0 (e.g. drop of Principle 3, etc.) and PSU is to give feedback and if needed, to raise objections (Policy Manager and Senior Expert); all objections from PSU would need then to be addressed in order to proceed to the public consultation.</p>
4.2 Failed processes deviations	FSC-STD-60-006: new section FSC-STD-60-002: new section FSC-PRO-60-006: new section FSC-PRO-60-007: new section	<p>Need to define the criteria for when a process formally becomes a “failed process” as per the currently valid decisions made by the Board of Directors (BoD). Need to define applicable deviations in content and process requirements for failed processes.</p> <p>On its 87<sup>th</sup> meeting in March 2021, the BoD approved PSU’s interim approach as a last resort where there are failing or missing national standard development</p>	<p>Need to define the timelines, roles, and responsibilities of each possible deviation when in a “failed process” scenario.</p> <p>Need to incorporate Interim approach approved by FSC Board of Directors in 87<sup>th</sup> BM to handle standard development processes that are failing due to lack of consensus among the SDG members on indicators, SDG failed to submit the draft standards within the stipulated</p>

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		<p>processes (full revision, partial revision or first development) for which supporting measures and dialogue with country-level stakeholders have not been successful. The approved interim approach considered criteria for when the deviations are to apply, and among others, defines procedures for giving PSU the leadership in some stages of the process to ensure continuity.</p> <p>Furthermore, there is the need to explore ways to prevent FSS processes from failing. For example, for INS in case the TWG coordinator does not operate successfully along the process, the coordination could pass over to other CB forming part of the TWG.</p>	<p>timeframe or failure of SDG to close conditions issued by PSC and PSG.</p>
4.3 Stakeholders' roles, responsibilities, and periods of intervention	<p>FSC-STD-60-006: 3-6, D terms and definitions</p> <p>FSC-PRO-60-007: Part 2, E terms and definitions</p>	<p><i>(Expected that the relevant requirements would be defined/revised, if found convenient during the revision process.)</i></p>	<p>Need to include a structure with clear definitions of all the actors (e.g., clearly define standard developers as not only TWGs nor SDGs but also being a CB, SDG, SDG coordinator, SDG Facilitator, SDG chair, National Office, National Board, FSC Regional Offices, etc.) including their specific roles (e.g. clarification of “lead” Vs “coordinator” for INS development processes and if only CBs can play such roles or also National Offices, etc.), responsibilities, and periods of intervention at each step of the process of development of the first FSS based on P&amp;C V5-2. Need to make a reference to the section on maintenance of FSS where the special process deviations are stated for review and revisions. Definitions of actors shall also be reflected and aligned in the glossary of terms of the normative document.</p> <p>Additionally, extraordinary procedures need to be included, for example when the standard</p>

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			<p>developer ceases to exist (e.g., SDG suddenly dissolves).</p> <p>This new content would aid in defining the ToR for any new processes that needs specific assistance at some point.</p>
4.4 Stakeholders' involvement – like IPs, public forest owners, etc.	FSC-STD-60-006: 3-6 FSC-PRO-60-007: Part 2	<p>Need to explore the idea of adding criteria for when specific stakeholders are recommended to be involved beyond public consultation during the development process of the FSS.</p> <p>Also, it is to clarify if additional public consultations are required to make new changes accessible for stakeholders to comment/provide feedback.</p>	<p>Need to clarify the timelines, role, and responsibilities, but also ways of participating, of the stakeholders beyond the public consultations (e.g., NGOs, governments, etc.), during the development or review/revision processes of FSS (e.g., role of government in SDGs, etc.).</p>
4.5 Consensus during key process steps	FSC-STD-60-006: 4, All FSC-STD-60-002: All FSC-PRO-60-007: Part 2 FSC-PRO-60-006: All	<i>(Relevant requirements would be defined/ revised, if found essential during the revision process.)</i>	<p>Need to define if SDG and TWG consensus shall be needed for all stages of the FSS development (e.g., public consultations, field test) and for the full range of indicators. A clear definition of “full range” is required. Otherwise, it is needed to define alternative options that could be provided for indicators (e.g., which indicators do not need SDG consensus) and to define if SDG consensus is only needed for the final version of the ‘pre-approval’ draft submitted for PSU assessment.</p> <p>In general, and for all FSS, clarity is needed as to when to request consensus / agreement / confirmation and from who (PSU, National Board, etc.), per process step.</p>
4.6 Standard developer qualifications and ToRs	FSC-STD-60-006: 4.3 FSC-PRO-60-007: 4, 14	<p>Need to define the types of standard developers allowed by PSU to register and develop an FSS, as per each type of FSS.</p> <p>In this matter, it is important to explain the difference between an SDG in a country with a National Board and an SDG in a country without a National Board. In</p>	<p>Regarding the Terms of Reference (ToR) it is needed to explicitly indicate the implications of not conforming with the ToRs and the role of the involved actors, like PSU and the standard developer (e.g., when ToRs are not conformed with, PSU will be empowered to re-define the</p>

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		<p>the former, continuity in the Board is more important than continuity in the SDG as they are only working under control of the Board.</p> <p>Also need to explicitly include consideration of the citizenship of standard developers that match the focus area of the FSS. It is desirable to have people more familiarized with the local context.</p> <p>Terms of References (ToRs) need to explicitly state the requirements for the ToRs and that ToRs shall be followed and fulfilled throughout the process.</p>	<p>future of the process and will take decisions case by case).</p> <p><i>(Other expected relevant procedures would be defined/revised, if found convenient during the revision process.)</i></p>
4.7 Registration of processes	FSC-STD-60-006: 1-4 FSC-PRO-60-007: Part 2	Among other relevant requirements as per the procedures explained in the column to the right, there is the need to define the requirements that make a registration request valid. Among those, the requirements to select the type of standard developer that is eligible per type of FSS process.	<p>Need to define the procedures for standard developers to evidence conformance with the requirements that make them eligible standard developers for each specific process. For example, INS and IRS need to define the procedures on how CBs conform to requirements that other CBs were consulted for when defining if a TWG or a GFSS process (including what type of evidence is to be accepted by PSU for conformance with this requirement). Also, to clarify if and under which circumstances PSU or an FSC National Office could register an INS process (see 4.1 procedure missing elements f).</p> <p>Also, need to clarify the procedures to register development of first FSS based on P&amp;C V5-2 processes to give all (PSU and Network Partners) a much clearer and more secure framework to work in. For example: The NFSS registration could be divided in 2 phases:</p> <p>1) register the process – the need to develop an NFSS,</p>

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			<p>2) register the SDG – confirmation that the conditions are met for the actual work on the NFSS to start; what is now considered as the official registration.</p> <p>Also need to make a reference to the section on maintenance of FSS where the special deviations are stated for review and revisions.</p> <p>An example of requirement to register a process could be to request a “justificative analysis” for the review report of an FSS, in which it is included an analysis of the last 5-year trend in decrease or increase in number of FM certificates in the country or region. Such analysis could also define how much priority the process would be given (see 6.2 procedures section).</p> <p>Finally, the normative documents do not specify how to de-register a process, what are the steps to follow, and persons involved in taking such decision. This is particularly relevant for failed FSS processes.</p>
4.8 Duration of FSS development	FSC-STD-60-006: 1, 10 FSC-PRO-60-006: 4 FSC-PRO-60-007: Part 2	<i>(Relevant requirements would be defined/ revised, if found essential during the revision process.)</i>	Need to re-define an overall maximum timeline for the FSS development, from registration until submission of ‘pre-approval’ draft.
4.9 Extension request	FSC-STD-60-006: 10 FSC-PRO-60-007: 4.11	<p>Need to explicitly state that it is possible to request to extend the date for submission of the ‘pre-approval’ draft to PSU for approval.</p> <p>Need to clarify under which conditions and requirements this option is possible and how many</p>	Need to state the roles and responsibilities and the procedure to obtain a submission extension request approved by PSU. Among the requirements, the extension request shall contain a complete revised timeline considering all the development FSS process steps

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		times it is possible to postpone the submission during the development of an FSS.	recognized by PSU (as per the template for the bi-monthly reporting on the development process).
4.10 Report on development progress	FSC-STD-60-006: 3 FSC-PRO-60-007: 6, 14	Need to state the requirement of the responsible party implementing the FSS development process to report to PSU Bonn on the progress of the development process, as per the last communicated PSU Bonn’s deadlines and reporting template.	<i>(Expect that the relevant procedures would be defined/ revised, if found essential/ convenient during the revision process.)</i>
4.11 Adaptation of IGIs	FSC-STD-60-006: 8 FSC-STD-60-002: 4 FSC-PRO-60-006: 2 FSC-PRO-60-007: 3	<i>(Relevant requirements would be defined/ revised, if found essential during the revision process.)</i>	Need to provide the standard developers, either as examples inside the normative documents or as a separate guide/manual, examples for each one of the multiple forms of IGI adaptation (e.g., split, expanding the scope, etc.). Also need to clarify how binding are the “Instructions for Standard Developers” that are found in FSC-STD-60-004 and templates for NFSS and for INS (and for example, which deviations for GFSS apply). Also, current user manuals for INS need to be revised or withdrawn if found relevant.  Also review and assess need to develop a guidance for SDs on how to achieve adaptations that produce outcome-oriented indicators.
4.12 Guidance on the SIR Guide and RBA	FSC-STD-60-002: 4, 6 FSC-PRO-60-006: 5 FSC-PRO-60-007: 3.1, 3.4	<i>(Relevant requirements would be defined/ revised, if found essential during the revision process.)</i>	Need to provide more guidance to the standard developers on how to use the FSC-GUI-60-002 SIR Guide during the development of the FSS. Example of this can be seen in FSC-PRO-60-007 clauses 3.1 and 3.4  Need to provide more guidance to the standard developers on how to use the FSC-PRO-60-010 and its guidance on incorporation of a risk-

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - <i>“What is allowed”</i>	Elements missing in procedures to define: - <i>“How, by whom, when”, towards the “what”</i>
			based approach in NFSS during the development of the FSS.
4.13 Field testing	FSC-STD-60-006: 9	<p>Need to specify requirements for the field test and clarify that during the field test all the contents of the standard draft shall be tested in terms of their auditability. The socioeconomic impacts of conformity with the standard shall also be considered and tested.</p> <p>Also, sub-Clause 9.1 of STD-60-006 says: “Revised standards should be forest tested where significant changes have been made which may affect the auditability of the standard...”. It is important to specify what these “significant changes” are and define if these are the same as “significantly changed requirements” that are often referred to for the phase-in of new requirements in the audit phase.</p> <p>Needs to be made clear if simplified approaches are allowed in certain cases – for instance, if only a few specific indicators are added to a national standard, can they be tested by means of just a field visit by SDG members and qualified CB auditor (i.e., not a full-fledged field test by a CB).</p>	<p>Need to clearly define the minimum mandatory information that needs to be considered in the field testing of the draft of FSS and contained in the field test report delivered to PSU. Information such as:</p> <p>a) Required number of man-days shall be proportional to forest area</p> <p>b) Entity (e.g., standard developer) in charge of deciding the selection of forest areas for field testing and who (e.g., CAB) is allowed to propose on this area selection.</p> <p>And, to define when and how a field testing can be carried out for failed FSS processes.</p>
4.14 Public consultation deviations	FSC-STD-60-006: 7 FSC-PRO-60-007: 5	<p>Need to clarify the conditions or criteria under which changes in the public consultations can apply (e.g., reduction or increase of number of rounds, changes in the days of duration, specific public consultations in parallel or at different times for specific type of indicators). The specific exception of running additional public consultation(s) during the PSU assessment of the ‘pre-approval’ draft also needs to be mentioned as a possibility and conditions for this deviation need to be defined.</p>	<p>Need to define the specific procedures for standard developers to formally apply for such deviations (e.g., actors involved and their roles and responsibilities plus the timeline allowed for applying).</p> <p>Need to clarify that how and via which platform standard developers shall perform public consultations, including those for partial revisions and interpretations for National Standards.</p>

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		There is also a need define additional consultations (and duration) for the partial revisions of FSS and developing interpretations for National Standards.	
4.15 Guidance on culturally appropriate consultation methods	FSC-STD-60-006: 7 FSC-PRO-60-007: 5	Need to define the allowed culturally appropriate consultation methods, or at least, to define the minimum requirements for such a purpose.  One example is the FSC-PRO-60-007 clause 5.5 which refers to ISEAL Code of Good Practice for Setting Social and Environmental Standards for checking culturally appropriate consultation methods, but this code is not detailed enough and often brings discussions during the assessment of PSU.	<i>(Expect that the relevant procedures would be defined/revised, if found essential/ convenient during the revision process.)</i>
4.16 Content in public consultation and report	FSC-STD-60-006: 7 FSC-PRO-60-007: 5	Need to clarify per all types of FSS: 1) if all the content of the FSS (including annexes, glossary, adopted IGIs, SLIMF indicators, etc.) shall go to the public consultation(s) or if just some sections or adapted indicators (see FSC-PRO-60-007 clause 3.1), 2) if there shall be minimum specific questions for the public consultation (e.g., by referring to a normative list of questions that are required to use by the SD in the public consultations including questions such as “do you agree with the scope?”, “do you agree with the not applicability of the principle 3?”, etc.) and 3) if all material in public consultation needs to be reported in the public consultation report of comments analysis.	<i>(Expect that the relevant procedures would be defined/revised, if found essential/ convenient during the revision process.)</i>
4.17 Analysis of stakeholders’ feedback	FSC-STD-60-006: 7 FSC-STD-60-002: 4 FSC-PRO-60-007: 5.7, 6.1	Need to clearly define the steps and process to address stakeholder comments (aligned with relevant ISEAL codes) from the public consultation to use them as inputs in decision making process for the content of the FSS. Also, not clear that the synopsis	<i>(Expect that the relevant procedures would be defined/revised, if found essential/ convenient during the revision process.)</i>

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - <i>“What is allowed”</i>	Elements missing in procedures to define: - <i>“How, by whom, when”, towards the “what”</i>
		or records of stakeholder comments needs to have the explanation per indicator on how the stakeholder comment shaped the change in the FSS draft (how each comment was considered in the final draft).	
4.18 Translation of records to be submitted to PSU	FSC-STD-60-006: 10.5 – f) FSC-PRO-60-007: 7.1	Need to specify translation requirements for all FSS. Clause 10.5 of FSC-STD-60-006 recommends translation of the ‘pre-approval’ draft to English for the approval of FSC. Clause 7.1 of FSC-PRO-60-007 states that for approval by the PSG the standard shall be submitted in English or Spanish. The language requirement for the draft is not clear, and it is even less clear for the additional documents that are required to be submitted to PSU for approval (e.g., field test report, summary of the standard development process, synopsis of public consultation, etc.).  For example, it could be clarified that when the ‘pre-approval’ draft is in one of the official languages of FSC (English and Spanish), the requirement of officially translating it into English does not apply.	Need to define per type of FSS process, when and how translations are to be requested and for which documents.
4.19 PSU assessment	FSC-STD-60-006: 11 FSC-STD-60-002: 8 FSC-PRO-60-006: 3-4 FSC-PRO-60-007: 11-12	Need to explain main features of PSU assessment phase (as per internal procedure FSC-PRO-10-607, FSC-PRO-10-607a and FSC-PRO-10-606).  Need to explore this aspect to bring more transparency to this stage of the process. Define requirements regarding the duration of the assessment, ensuring while the requirements allow enough flexibility in duration and rounds of PSU assessment for cases when it is needed to properly address complicated issues in the draft between SD and PSU (e.g., dropping of Principle 3, etc.). Also, need to define the criteria for increasing the number of rounds for improvement of INS (e.g., in clause 11.1 of the FSC-PRO-60-007).	Need to define related procedures so it is clear for example, the standard developer will need to improve the document at least one time during this stage and fill in the PSU Assessment Report that contains a process and content checklist during the stage of PSU assessment. Also, need to clarify approximate timelines for PSU assessment until the FSS can be approved.

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - <i>“What is allowed”</i>	Elements missing in procedures to define: - <i>“How, by whom, when”, towards the “what”</i>
4.20 Process between approval and publication	FSC-STD-60-006: 10.6 FSC-STD-60-002: 8 FSC-PRO-60-007: 11, 14	Need to define allowed timespan between (conditional) approval and publication of the approved FSS.  Also, there are cases where the FSS could be approved by PSC or PSG and therefore, the process is different for each case, and this is not explained in the procedure. It should at least make a reference to the main content in the internal procedure FSC-PRO-10-607.	<i>(Expect that the relevant procedures would be defined/revised, if found essential/ convenient during the revision process.)</i>
<b>Main issue 5: Publication of FSS</b>			
5.1 Translation and publication of FSS	FSC-STD-60-006: 11, 14 FSC-STD-60-002: 7 FSC-PRO-60-007: 7, 12	Need to consider adding or amending sections on translation and publication of finally approved FSS. Need to have clear translation possibilities, publication channels for the translated versions as per official and non-official FSC languages, requirements to inform FSC and proceed to create translated versions, requirement to add the translation disclaimer (not an official FSC FSS version) and to leave the code as per the official version, and to set the allowed timelines for developing and publishing and withdrawing translated versions.	Need to define roles and responsibilities for the process of generation and publication of translated versions (FSC official and unofficial languages).
<b>Main issue 6: Maintenance of FSS</b>			
6.1 Possible categories of revised FSS	FSC-STD-60-006: 1, 12 FSC-PRO-60-007: Part 2	Need to clearly specify all the possible types of revised FSS which involve combinations of full, partial, editorial, content, scheduled and unscheduled revision processes and the requirements to apply to each one of the combinations of revision processes.  Also need to indicate criteria to define a FSS revision process as partial or as complete.	<i>(Expect that the relevant procedures would be defined/revised, if found essential/ convenient during the revision process.)</i>

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - <i>“What is allowed”</i>	Elements missing in procedures to define: - <i>“How, by whom, when”, towards the “what”</i>
6.2 Review and revisions’ deviations	FSC-STD-60-006: 7,9.1,10,11,12.1,15 FSC-PRO-60-007: 10, 14	<p>Need to clearly identify for revisions of FSS based on P&amp;C V5-2 (including partial revisions) the deviations in requirements from the generic process of development of an FSS based on P&amp;C V5-2 for the first time. This includes requirements to develop and deliver the review report and to register the revision process, besides the deviations while ongoing development process (e.g., public consultation, field testing, etc.) and requirements for the submission of the final revised drafts to PSU for approval. Also, deviations between NFSS and INS (including the low complexity NFSS), and inside INS, and deviations between TWG and GFSS processes.</p> <p>Moreover, deviations in terms of more simplified process for revision of FSS depending on the scale of change in the FSS (including change of critical elements such as scope, indicators, new and revised IGIs, etc.).</p> <p>This will give everyone (PSU and Network Partners) a much clearer and more secure framework to work in when maintaining the FSS.</p>	<p>Need to include additional procedures (to the ones applicable when developing an FSS for the first time) to develop and deliver the review report and to register the revision process. The procedure FSC-PRO-60-006 applies to the incorporation IGIs to the transfer processes, but it is lacking clarification on the use of this procedure for revision of FSS.</p> <p>As an example of the type of procedures to add in this sense, there is a recent interpretation on using the Transfer Matrix for scheduled revisions of NFSS.</p> <p>Other example is to request for revisions in the form of a review report, a document where the drivers for revision are expressed, for example, information on non-conformities or weaknesses in implementation of certain indicators, increase or decrease of number of certifications in the country, impacts of the revision, etc.</p> <p>This will give everyone (PSU and Network Partners) a much clearer and more secure framework to work in when maintaining the FSS.</p>
6.3 Stakeholder, roles, responsibilities, and periods of intervention in review and revision processes	FSC-STD-60-006: 3-6, 12 FSC-PRO-60-007: 10, 14	<p>Need to clarify what is done differently when maintaining FSS (review and revision) versus when developing an FSS for the first time.</p> <p><i>(Other relevant requirements would be defined/revised, if found convenient during the revision process.)</i></p>	<p>Need to include the deviations applicable to review and partial/full revisions in terms of structure of the stakeholders/actors (e.g., SDG composition, SDG coordinator, SDG Facilitator, SDG chair, National Office, National Board, FSC Regional Offices, TWG for revision of INS, etc.) their specific roles, responsibilities, and periods of intervention at each step of the</p>

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - <i>“What is allowed”</i>	Elements missing in procedures to define: - <i>“How, by whom, when”, towards the “what”</i>
			<p>process of development of the revised FSS. Theoretical example of a deviation: three SDG members (one per chamber) are sufficient for partial revision.</p> <p>Additionally, extraordinary procedures are needed to be included, for example when the standard developer ceases to exist (e.g., SDG suddenly dissolved).</p> <p>This new content would aid the definition of the ToR for any new processes that needs specific assistance at some point.</p> <p>Similarly, clauses 10.3 and 10.4 of FSC-PRO-60-007 need to be revised. This is required to align the review and revision of INS processes with the rest of the respective processes for the other FSS.</p>
6.4 Stakeholders' involvement	FSC-STD-60-006: 12 FSC-PRO-60-007: 10	<i>(Relevant requirements would be defined/ revised, if found essential during the revision process.)</i>	Need to clarify the role of stakeholders (NGOs, governments, academic centers, etc.) in the review and revisions process of FSS based on P&C V5-2 (e.g., role of government in SDGs, etc.). For example, to set clear limits to the stakeholders' participations during these processes.
6.5 Systematic incorporation of new IGIs	FSC-STD-60-006: 12 FSC-STD-60-002: 4 FSC-PRO-60-006: 2, 3, 7 FSC-PRO-60-007: 10	<p>Need to clarify on how to incorporate and use the new and revised IGI as per the possible scenarios of FSS development and maintenance (e.g., development of new FSS, scheduled revision, and unscheduled revision).</p> <p>It is needed to align the requirements and to include the content from the ADVICE-60-006-01 on incorporation of new IGIs into NFSS (and INS) as well as the latest Board of Directors decisions relevant for the normative documents to update the general rules</p>	<i>(Expected that the relevant procedures would be defined/ revised, if found essential/ convenient during the revision process.)</i>

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - <i>“What is allowed”</i>	Elements missing in procedures to define: - <i>“How, by whom, when”, towards the “what”</i>
		<p>of the process. Especially for systematic incorporation of new IGIs to the new and revised FSS.</p> <p>For FSC-STD-60-002 and FSC-PRO-60-006 it is sufficient to leave the reference to the process requirements for incorporation of new IGIs.</p>	
6.6 Definition of “significantly changed requirements” and related phase-in deviations	FSC-STD-60-006: 12 FSC-PRO-60-006: 3,8 FSC-PRO-60-007: 10	<p>Need to clarify when a partial revision implies “significantly changed requirements” in the light of the partial revisions’ implications in the allowed extended time to close non-conformities.</p> <p>Review the relevant sections to build a connection with normative documents setting the rules for the implementation of the FSS (e.g., Forest Management evaluations), by using same wording to refer to same “conditions” that are triggering deviations and accepted in the normative framework in the implementation (phase-in) of the standard on the field and with the certificate holders (outcome oriented).</p>	<i>(Expected that the relevant procedures would be defined/revise, if found essential/ convenient during the revision process.)</i>
<b>Main issue 7: Clarifications of FSS content</b>			
7.1 Definition of types of clarifications and PSU responses	FSC-STD-60-006: 13, 16 FSC-PRO-60-007: 8.2, 10	<p>Need to define what are the possible types of clarifications (e.g., guidance notes, implementation guidance documents and national interpretations) and the complete gamma of possible PSU responses related to each one of them (e.g., development or just approval of national interpretations, etc.). Also need to define the requirements for the development of FSC official clarifications. For example, for PSU to accept a national interpretation request, the draft of the national interpretation need to be submitted to public consultation.</p>	<p>Need to define clear roles and responsibilities for the development, submission, reception, collection, recording, analysis, approval, publication, and withdrawal of the several types of clarifications (including national interpretations, and involvement of external entities such as ASI, if need be). Need to add the content from INT-STD-60-006_01. Also need to define procedures and timelines for urgent requests for national interpretations.</p>

Specific issue	Normative document and possible relevant sections	Elements missing in requirements to define: - “What is allowed”	Elements missing in procedures to define: - “How, by whom, when”, towards the “what”
7.2 Definition of requirements to process the types of clarifications.	FSC-STD-60-006: 13 FSC-PRO-60-007: 8.2	Need to define clear requirements for the development of the request, the reception and processing, the evaluation, approval, publication, and withdrawal of each type of clarification for FSS. Need to add content from the INT-STD-60-006_01.	<i>(Expect that the relevant procedures would be defined/ revised, if found essential/ convenient during the revision process.)</i>
7.3 Formal vs informal comments from stakeholders	FSC-STD-60-006: All FSC-STD-60-002: All FSC-PRO-60-006: All FSC-PRO-60-007: All	Need to clarify what are formal and informal comments from stakeholders during the development (including PSU assessment) of the FSS draft and after publication of the FSS. Define procedure and timelines to process such comments and identify if deviations apply to specific FSS (e.g., INS GFSS-based)	<i>(Expect that the relevant procedures would be defined/ revised, if found essential/ convenient during the revision process.)</i>
7.4 Guidance for standard developers such as user manuals	FSC-STD-60-006: new section FSC-STD-60-002: new section FSC-PRO-60-006: new section FSC-PRO-60-007: new section	<i>(Relevant requirements would be defined/ revised, if found essential during the revision process.)</i>	Need to generate, update, and align user manuals for all kinds of FSS (including GFSS-based INS) to provide guidance on how to understand the content of the normative documents stating the rules and procedures for FSS development and maintenance. Such a manual could be added as an initial section per each normative document.