PUBLIC CONSULTATION FOR THE SECOND DRAFT OF THE FSC POLICY ON CONVERSION
SUMMARY OF PUBLIC CONSULTATION MATERIALS

Please note that the purpose of this document is to provide an overview on public consultation materials. Please provide your feedback on the second draft of the FSC Policy on Conversion through the FSC online public consultation platform here only.

Introduction to the public consultation

Welcome to the Public Consultation for the second draft of the FSC Policy on Conversion

This public consultation is open until 16 February 2020 and will be used to collect stakeholders' feedback on a series of questions regarding the policy principles/areas in the second draft of the Policy on Conversion. FSC encourages all interested stakeholders to participate and provide their input during this period, as input is critical to the further amendment of the policy.

It is not mandatory to respond to all the questions. You may want to choose sections that are most important/relevant to you. You can save current progress and edit your responses right up until you submit the survey for analysis. It is possible to edit your responses until the close of the consultation period. The estimated time to complete all question items are 20 mins.

Please take the opportunity to share your opinions and suggestions.

Opening date: 17th December 2019 00:00:00 CET
Closing date: 16th February 2020 23:59:59 CET

Thank you in advance for your participation.

Please contact Yan li at y.li@fsc.org for questions.
Introduction to the public consultation

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

1. Please select the option(s) that you identify yourself as to help us understand more about your background and interests.
   - Social NGO
   - Environmental NGO
   - Academic
   - Smallholder
   - Community member
   - Government
   - Certificate holder (FM)
   - Certificate holder (CoC)
   - Indigenous peoples
   - CB
   - Others

2. Are you an FSC member?
   - Yes
   - No

3. Are you a member in the Policy on Conversion Consultative forum?
   - Yes
   - No

4. Would you like to give your consent for being contacted by the consultation organizer or working group members via email?
   - Yes
   - No

5. Which one of the following three interests best represent you?
   - Economic
   - Environmental
   - Social
Background Introduction on Motion 7 and FSC Policy on Conversion

FSC is developing a holistic Policy on Conversion. This will guide the review and revision of relevant FSC Normative Framework documents addressing conversion and the development of national level indicators addressing conversion.

The policy development is in direct response to:

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

It is also linked to:

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

The process being established by FSC to address Motion 7 is to separate the development of the holistic policy from the development of mechanisms to operationalize the policy:

- The policy Working Group (WG), comprised of FSC members, is tasked with establishing the high-level holistic [Policy on Conversion](#).
- Whilst a Technical Working Group (TWG), comprised of experts appointed by FSC, will support FSC in developing [mechanisms to translate the policy into operational practice](#).

The precise scope and key policy areas of the Policy on Conversion was approved by the Board of Directors on 16 July 2018, please refer to [WG ToR](#) for further details.
The chamber-balanced WG was established in August 2018 and it comprises the following members:

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Sub-chamber</th>
<th>Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marthe Tollenaar</td>
<td>New Forests</td>
<td>ECON-N</td>
<td>Singapore/ Asia Pacific</td>
</tr>
<tr>
<td>Francisco Javier</td>
<td>CMPC celulosa</td>
<td>ECON-S</td>
<td>Chile/LATAM</td>
</tr>
<tr>
<td>Annika Terrana</td>
<td>WWF</td>
<td>ENV-N</td>
<td>US</td>
</tr>
<tr>
<td>Michal Zrust</td>
<td>Individual</td>
<td>ENV-S</td>
<td>Indonesia/ Asia Pacific</td>
</tr>
<tr>
<td>Linda Fienberg</td>
<td>Individual</td>
<td>SOC-N</td>
<td>Australia/Asia Pacific</td>
</tr>
<tr>
<td>Verma Dharam Pal Singh</td>
<td>Individual</td>
<td>SOC-S</td>
<td>India/ Asia Pacific</td>
</tr>
</tbody>
</table>

As of today, the Policy on Conversion WG has held twenty-nine online calls and four face to face meetings. The WG has held dialogues on principles required for a holistic Policy on Conversion, compensation mechanism as well as alignment needs for the FSC normative framework (as stated in the WG Terms of Reference). During the development of this second draft of the Policy, the WG has received and considered feedback via various channels, e.g. public consultation held during 1 August 2019 to 30 September 2019, Consultative Forum survey, FSC regional meetings, forestry related conferences, direct input in writing to the WG, etc.

Following the first public consultation, a fourth face to face meeting of the WG was held during 26 -29 November 2019 in Bonn, Germany, to discuss the feedback and input from stakeholders and to consider amending and adapting the policy for the second public consultation. Further details on the consultation for Policy draft 1-0 can be found in the synopsis report available under supporting document in this public consultation. According to the approved work plan, the final version of the FSC Policy on Conversion will be submitted to the FSC Board of Directors for approval, following the completion of the second public consultation and incorporation of the feedback received.

Supporting documents: FSC Mission and Statutes; FSC: A Tool to Implement the Sustainable Development Goals; FSC Global Strategic Plan; WG ToR, FSC's position on plantations; UN Declaration on the Right to Development; UN decade of ecosystem restoration.
Introduction on the Second draft of FSC Policy on Conversion

Rationale for Changes in the Policy

1. Introduction

Public consultation for the first draft of FSC Policy on Conversion was held during August and September 2019. Overall 161 stakeholders provided their valuable feedback on the first draft. The WG has over the last two months analysed this feedback from stakeholders and FSC members. The analysis was initially based on a quantitative analysis that was grouped by FSC Chambers. This was further broken down into responses from FSC members and non-members and an analysis of the responses received based on the location of responses from FSC members depending on whether that may be considered as “North” or “South”.

These responses were grouped into whether respondents, supported the concept in the draft, opposed it or where neutral. The feedback was then further analysed in a qualitative manner to evaluate how stakeholders had specifically commented on the draft policy elements. The WG members prioritized this qualitative feedback into High, Medium and Low priority for both the responses supporting and opposing the specific concept. Based on this analysis of the public consultation feedback, the WG discussed and addressed the feedback during the development of the second draft of The Policy for Conversion.

For details of analysis methodology and results, please refer to the Synopsis Report for the public consultation – First draft of FSC Policy on Conversion available under supporting documents.

2.0 Further Tools used during the drafting of the second version of the Draft on The Policy on Conversion

For the WG to effectively consider the potential impact of the proposed Policy on Conversion in furthering the Mission of FSC, the WG identified significant areas of research including relevant aspects of conversion, restoration, conservation and global threats to biodiversity. Considering the large amount of information available and the WG’s time available it was decided to limit the analysis of this research during the recent Face to Face meeting to The Intergovernmental Panel on Climate Change (IPCC) and The Food and Agriculture Organization (FAO) data, specifically the State of Worlds Forest and Forest Resource Assessment data, both at a global report and individual country report level. The WG has established case studies in order to assess the potential impact of the proposed Policy and identified further research required prior to finalising the Policy.
2.1 Status of Current Land Use in the World

Data from the IPCC Special Report on Climate Change, Desertification, Land Degradation, Sustainable Land Management, Food Security, and Greenhouse gas fluxes in Terrestrial Ecosystems, Summary for Policy Makers Approved Draft, 07 August 2019 was used by the WG to consider how FSC may influence global commitments to halting conversion and preventing biodiversity loss. Graph 1 was primarily used to identify areas that may be considered as the remaining natural ecosystems across the globe and the global area under natural forest management and plantations. The WG considered the area highlighted in green in the Graph below in evaluating focus of the Policy on Conversion. This data was also used to consider the potential for FSC to have a positive impact on degraded areas within the land uses in Graph 1.

**Graph 1: IPCC Special Report on Climate Change, Desertification, Land Degradation, Sustainable Land Management, Food Security, and Greenhouse gas fluxes in Terrestrial Ecosystems, Summary for Policy Makers Approved Draft, 07 August 2019**

- **Global ice free land surface (130M Km3)**
- **Other land (barren rock)**
- **Forests (Intact or primary) with minimal human use**
- **Unforested ecosystem with minimal human use**
- **Forests managed for timber and other uses**
  - **Plantation forest**
  - **Extensive pasture**
  - **Used savannah and shrublands**
  - **Intensive Pasture**
  - **No-irrigated cropland**
  - **Irrigated cropland**
  - **Infrastructure**
2.2 Ownership of Forest Land
The WG considered the land ownership across the globe based on the FAO 2018 the State of the World's forest Ownership statistics as provided in Graph 2. There is potential that this policy may have an immediate impact on the ownership highlighted in light green in the graph, with potential to also impact on some of the Public forests. The WG acknowledged that there are a number of reasons for either not needing to influence this Public forest ownership, for example state protected forest in relatively stable condition or it may take longer for FSC to have an influence over other forests in this sector due to the need to engage some governments before any influence may have an effect.

Forest ownership modality
- Community-owned forests + individually-owned forests
- Community-owned forests
- Individually owned forests
- Public forests (administered by gov)

Graph 2: Forest Ownership as reported in the FAO 2018 the State of the World’s forests
2.3 Deforestation and Forest Degradation Drivers – a preliminary picture

**Deforestation drivers**

<table>
<thead>
<tr>
<th>Region</th>
<th>Agriculture (commercial)</th>
<th>Agriculture (local/subsistence)</th>
<th>Mining</th>
<th>Infrastructure</th>
<th>Urban expansion</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Sub) tropical Asia</td>
<td>40%</td>
<td>30%</td>
<td>10%</td>
<td>20%</td>
<td>10%</td>
</tr>
<tr>
<td>Latin America</td>
<td>50%</td>
<td>40%</td>
<td>10%</td>
<td>5%</td>
<td>5%</td>
</tr>
<tr>
<td>Africa</td>
<td>60%</td>
<td>50%</td>
<td>30%</td>
<td>20%</td>
<td>5%</td>
</tr>
</tbody>
</table>

Graph 3: Deforestation drivers as reported in the FAO, 2017. The charcoal transition: greening the charcoal value chain to mitigate climate change and improve local livelihoods.

**Forest degradation drivers**

<table>
<thead>
<tr>
<th>Region</th>
<th>Timber logging</th>
<th>Fuelwood/charcoal</th>
<th>Uncontrolled fires</th>
<th>Livestock grazing in forest</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Sub) tropical Asia</td>
<td>80%</td>
<td>20%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Latin America</td>
<td>70%</td>
<td>30%</td>
<td>10%</td>
<td>10%</td>
</tr>
<tr>
<td>Africa</td>
<td>60%</td>
<td>40%</td>
<td>20%</td>
<td>20%</td>
</tr>
</tbody>
</table>

Graph 4: Deforestation drivers as reported in the FAO, 2017. The charcoal transition: greening the charcoal value chain to mitigate climate change and improve local livelihoods.
The WG acknowledges that these graphs do not represent a global picture of conversion drivers and therefore also discussed drivers of degradation and deforestation in Northern Hemisphere countries, with some of the drivers being uncontrolled wildfire, climate change, and urban expansion. The WG also acknowledges that the FAO State of the World Forest and Forest Risk assessments indicate that some countries can demonstrate that their natural forest areas are either static or increasing as indicated in Figure 1 below, but that these figures, being net forest cover, do not reflect sub-regional conversion.

Figure 1: FAO 2015 Global Forest Resources Assessment showing Naturally regenerated forest area change.

Following these discussions, the Working focused on revising the draft considering all the above.
### Introduction on the Public consultation structure

The consultation questions related to the policy areas start from section I. Terms & definitions. In total, there are 11 question items. Please find below an overview of the public consultation questions for second draft of the FSC Policy on Conversion:

#### Section I: Terms and definitions

- **Question 1.** Do you support the added/amended terms and definitions?
- **Question 2.** The Working group considered two options for defining indirect involvement. Please indicate which option you would prefer the FSC Policy on Conversion to adopt.
- **Question 3.** Is the inclusion of "related entities" addressing adequately concerns about the effectiveness of the definition of indirect involvement?

#### Section II: Scope of conversion

- **Question 4.** Do you support the inclusion of natural forest and HCV?

#### Section III: Cut-off rule & Motion for GA 2020

- **Question 5.** Do you support the proposed principle 3 on cut-off rule?
- **Question 6.** Do you support the proposed motion text for General Assembly 2020?

#### Section IV: Acceptable small scale/minimal conversion

- **Question 7.** Do you support the proposed principle 6 on small scale/minimal conversion?

#### Section V: Compensation procedures

- **Question 8.** Do you support the adjusted compensation procedures?
- **Question 9.** Do you agree with the proposed 5 years conversion free period?
- **Question 10.** Do you agree with the proposed principle 10 related to dispensation criteria for small-scale Smallholder?

#### Generic Comment

- **Question 11.** Do you have any further comments on the second draft of FSC Policy on Conversion?
**Section I: Terms and definitions**

In response to stakeholders feedback the WG has added the following definitions into the second draft of the Policy:

<table>
<thead>
<tr>
<th>Added definitions</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Additionality:</strong> Additionality outside the Management Unit: conservation and/or restoration outcomes over and above those already achieved or planned to be achieved, and that would not have been achieved without the support and/or intervention of the organization. Projects must either be new (i.e. not already being implemented or planned) or amended or extended so that conservation and/or restoration outcomes are enhanced beyond what would have been achieved or planned or funded to be achieved without the organization planning to compensate for historical conversion. Additionality inside the Management Unit: conservation and/or restoration outcomes above and beyond those required by the FSC Standards.</td>
<td>The reason for adding this definition is to clarify what FSC means by additionality in terms of the development of requirements in the Compensation Procedure to be developed by the TWG.</td>
</tr>
<tr>
<td><strong>Competent Authority:</strong> An independent, third party company or organization appointed by FSC to monitor, verify and report on the implementation of the compensation plan.</td>
<td>The reason for adding this definition is to provide clarity on how FSC may approve Compensation Plans developed as part the Compensation Procedure being developed by the TWG.</td>
</tr>
<tr>
<td><strong>Direct involvement:</strong> firsthand responsibility of the associated organization or individual.</td>
<td>The WG is aware that FSC is currently working on revising this definition and therefore places the</td>
</tr>
</tbody>
</table>

**Question 1:** Do you support these added/amended terms & definitions?  
- Strongly Agree  
- Agree  
- Neutral  
- Disagree  
- Strongly disagree

Please briefly explain the rationale.
<table>
<thead>
<tr>
<th><strong>Indirect involvement:</strong> Involvement of the associated organization or individual, with a minimum ownership or voting power of 51%, as a parent or sister company, subsidiary, shareholder or Board of Directors, to an organization with direct involvement. Indirect involvement also includes involvement of subcontractors when acting on behalf of the associated organization or individual.</th>
<th>The WG is aware that FSC is currently working on revising this definition and therefore places the definition into the policy on the understanding that this will be changed and aligned in FSC. The intent of adding the definition is to indicate to stakeholders that this term will be defined based on FSC experience with the Policy for Association.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Equivalent:</strong> For ecological equivalence - The same specific type of natural forest or High Conservation Value is restored or conserved as was destroyed.</td>
<td>For social restitution, equivalence should be based on an assessment (through FPIC) of the nature, quality and quantity of all losses as well as the ongoing future benefits these would have provided. Equivalence should entail provision of the best means possible to ensure future community success.</td>
</tr>
<tr>
<td><strong>Proportional:</strong> A 1:1 ratio: The area to be restored or conserved is the same as the area of natural forest and/or High Conservation Value destroyed.</td>
<td>The motivation for adding Equivalent and Proportional definitions is to provide clarity in relation to compensation requirements that would be part of the Compensation Procedure being developed by the TWG.</td>
</tr>
<tr>
<td><strong>Very limited portion:</strong> a) Forest management standards: The affected area shall* not exceed 5% of the Management Unit*. b) Policy for Association: The affected area shall* not exceed 5% of the total forest area under direct or indirect involvement of the organization in the past five years.</td>
<td>Definition added to provide clarity in relation to acceptable conversion.</td>
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</table>
Regarding "Indirect involvement", the WG considered two options for its definition:

<table>
<thead>
<tr>
<th>Option</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Option 1:</strong> Indirect involvement: Involvement of the associated organization or individual, with a minimum ownership or voting power of 51%, as a parent or sister company, subsidiary, shareholder or Board of Directors, to an organization with direct involvement. Indirect involvement also includes related entities* or involvement of subcontractors when acting on behalf of the associated organization or individual.</td>
<td>The inclusion of related entities addresses the outstanding issue of a definition for indirect control/involvement that excludes companies and stakeholders who significantly benefit and influence from large-scale conversion and human rights violations, undermining the effectiveness and intent of the PfA. Meanwhile, inclusion of ‘beneficial ownership’ accord with developments in international law. For example, determining beneficial ownership information is a requirement of the European Union Fourth Anti-Money Laundering Directive and different jurisdictions are passing enabling laws to enforce reporting requirements. In the US, similar beneficial ownership disclosures are a part of the FinCEN Customer Due Diligence Final Rule effective from May 11, 2018.</td>
</tr>
<tr>
<td><strong>Option 2</strong> Indirect involvement: Situations in which the associated organization or individual, with a minimum ownership or voting power of 51%, is involved as a parent or sister company, subsidiary, shareholder or Board of Directors to an organization directly involved in conversion. Indirect involvement also includes activities performed by subcontractors when acting</td>
<td>It is extremely complex to map out those related entities mentioned in option 1, that are indirectly involved with the certificate holder. Such maps are difficult to be made comprehensive and complete in practice and requires continuous updating as it is continuously changing. Furthermore, companies are currently required to commit to compliance with the PfA for all indirectly involved organizations, which will require them to either undertake regular assessments of all indirectly involved</td>
</tr>
</tbody>
</table>

**Question 2:** The Working group considered two options for defining indirect involvement. Please indicate which option you would prefer the FSC Policy on Conversion to adopt.
- Option 1
- Option 2

Please briefly explain the rationale

**Question 3:** Is the inclusion of “related entities” addressing adequately concerns about the effectiveness of the definition of indirect involvement?
- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please briefly explain the rationale
on behalf of the associated organization or individual organizations, or to take a risk and commit to something they are in fact not in control of. If the definition of “indirect involvement” is extended to include related entities, a term that is much more loosely defined and will likely have a much broader reach, the exercise of mapping out these entities becomes exponentially more complex and the levels of control over these related entities will be even smaller.

In addition, PfA complaint cases will become incredibly complex to manage by FSC. In the time it takes for FSC to map out any related entities, the reputational damage to a certified organization could be significant.

**In response to stakeholders feedback the WG has also revised the following Term and Definition:**

Based on stakeholder feedback, the primary change to this definition is to clarify “what vegetation cover” would be considered as conversion. Members have requested that compensation is only considered for past conversion and that FSC restricts this policy to existing requirements. Considering this and other responses requesting FSC to align with global commitments, the Working Group considered “What does FSC want totally protected” and “Where is there an opportunity for FSC to contribute to restoration commitments”. Assessing Land Use as described in the Introduction to this consultation, the Working Group concluded that by using the existing definitions for Natural Forests and High Conservation Value Area definitions would be the best way of defining this. Other changes were simply to realign how terms within this definition are defined and to clarify that some limited conversion is accepted as part of responsible forest management.

<table>
<thead>
<tr>
<th>Draft 1-0</th>
<th>Draft 2-0</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Restitution:</strong> The process of compensating for all social losses, impacts and human right harm and facilitating a transition to the position before such losses, impacts and harm occurred; or, developing alternative measures to ameliorate harm by providing gains recognized by the affected stakeholders* as equivalent to the losses.</td>
<td><strong>Restitution:</strong> An FPIC based process of assessing and compensating for all social losses, impacts and human right harm and facilitating a transition to the position before such losses, impacts and harm occurred; or, developing alternative measures to ameliorate harm by providing gains recognized by the affected stakeholders* as equivalent to the losses.</td>
</tr>
</tbody>
</table>
There were comments from stakeholders that the social elements of this Policy are not highlighted, this definition was specifically modified to provide clarity on this.

Other definitions have been modified in very minor ways to indicate the intent of FSC and to ensure full consideration of social aspects in this Policy.
Section II: Scope of conversion

The WG had proposed in Draft 1 of the Policy to consider conversion of natural ecosystems in this Policy. Results from the stakeholder feedback indicate that the FSC membership is still very divided over this. Moreover, there was considerable confusion over definitions of natural ecosystems that could be applied at a global level. Additionally, the Compensation Procedure will only apply to past conversion.

When the WG considered this, “what does FSC want totally protected” and “where is there an opportunity for FSC to contribute to restoration commitments”, it was identified through the IPCC classification of Land Use, that protecting and restoring natural forests (as defined in existing FSC definitions) and High Conservation Value Areas (as defined in existing FSC definitions) would contribute to FSC Mission and provide protection and restoration and restitution opportunities to other “non-forest” ecosystems and cultural values that are identified as High Conservation Values (HCV). Meanwhile, the inclusion of HCVs allows for use of a globally accepted framework and consistent guidance.

As the terminology used is now in line with existing definitions it will also answer a significant feedback response regarding how terms in the Policy are defined.

Q4: Do you support the inclusion of “natural forest and HCV”?

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

Please briefly explain the rationale
### Section III: Cut-off rule & Motion for GA 2020

In response to stakeholders feedback the WG has selected and revised option 3 which was originally proposed in Policy draft 1-0 in terms of cut-off rule. Changes from draft 1-0 to draft 2-0 are as below:

<table>
<thead>
<tr>
<th>Draft 1-0</th>
<th>Draft 2-0</th>
</tr>
</thead>
<tbody>
<tr>
<td>3. To incentivize and advance the restoration and conservation of natural ecosystems, and restitution of social harm caused by conversion, FSC enables:</td>
<td>3 a) Organizations that were directly or indirectly involved* in conversion* on the Management Unit* after November 1994 and before October 2020 are eligible for FSC forest management certification of that Management Unit* upon demonstrated compliance with the FSC Compensation Procedure.</td>
</tr>
<tr>
<td><strong>OPTION 3</strong>&lt;br&gt;Organizations that are directly or indirectly involved* in conversion that occurred after 1994 and before 2020 to apply for certification or association to the FSC system upon demonstrated compliance with compensation mechanism requirements. Organizations that are directly or indirectly involved* in conversion that occurs after 2020 are not eligible to enter the FSC certification system.</td>
<td>3 b) Organizations that were directly or indirectly involved* in conversion* after November 1994 are eligible to associate with FSC upon demonstrated compliance with the FSC Compensation Procedure.</td>
</tr>
<tr>
<td>4. Organizations that are directly or indirectly involved* in conversion that occurs after October 2020 are not eligible for FSC forest management certification1 of that Management Unit*.</td>
<td>4. Organizations that are directly or indirectly involved* in conversion* on the Management Unit* after October 2020 are not eligible for FSC forest management certification1 of that Management Unit*.</td>
</tr>
</tbody>
</table>

The proposals in principle 3 (draft 1) and principles 3 and 4 (draft 2) of the Policy drafts represent a change to the existing criterion 6.10 of the FSC Principles and Criteria (FSC-STD-01-001). The FSC membership will need to agree on these changes to be implementable, with the most appropriate place being at the General Assembly in 2020. In line with these requirements the Working Group will be developing a Motion for presentation at the GA in 2020. The Working Group would like to give FSC membership the opportunity to view the proposed changes and consult widely on this motion before finalizing the motion in an attempt to gain a wide understanding of the proposal and support for the

<table>
<thead>
<tr>
<th>Question 5: Do you support the proposed principle 3 on cut-off rule?</th>
</tr>
</thead>
<tbody>
<tr>
<td>○ Strongly Agree</td>
</tr>
<tr>
<td>○ Agree</td>
</tr>
<tr>
<td>○ Neutral</td>
</tr>
<tr>
<td>○ Disagree</td>
</tr>
<tr>
<td>○ Strongly disagree</td>
</tr>
</tbody>
</table>

Please provide your rationale
change. Based on current drafts of this policy the wording below has been developed as per the content as below:

**Proposed Motion for GA2020**

6.10 a) Management Units* containing plantations* that were established on areas converted from natural forest* between November 1994 and October 2020 shall not qualify for certification, except where:

i. Clear and sufficient evidence is provided that The Organization* was not directly or indirectly involved in conversion, or

ii. The conversion affected a very limited portion of the Management Unit and is producing additional, long-term conservation benefits and where possible social benefits, or

iii. The Organization* demonstrates compliance with the Compensation Procedure.

6.10 b) Management Units* that were established on areas converted from natural forest* or HCV* areas after October 2020 shall not qualify for certification, except where:

i. Clear and sufficient evidence is provided that The Organization* was not directly or indirectly involved in conversion, or

ii. The conversion affected a very limited portion of the Management Unit and it is producing additional, long-term conservation benefits and where possible social benefits.

As explained in the introduction section of this public consultation, the Motion 7 TWG will develop the compensation procedure mentioned in the text above. The second draft of the compensation procedure is scheduled to be under the second round of public consultation during GA2020. Further progress of the Motion 7 Technical working group can be accessed [here](https://www.fsc.org).

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**Question 6: Do you support the proposed the proposed motion text for General Assembly 2020?**

- [ ] Strongly Agree
- [ ] Agree
- [ ] Neutral
- [ ] Disagree
- [ ] Strongly disagree

**Please provide your rationale**

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Section IV: Acceptable small scale/minimal conversion

FSC is helping to addressing the challenges as raised by the FAO in a recent "Reducing Rural Hunger" document. The document writes "Despite progress made in reducing poverty, over 2 billion people still live in poverty, 736 million of which live in extreme poverty. A large majority live in rural areas and depend on agriculture for their livelihoods. These communities often lack income to buy food and access to resources, services, technologies, markets and economic opportunities to exit poverty. FAO supports governments in reducing rural poverty through inclusive rural transformation with an emphasis on addressing the needs of rural women and youth. A multi-dimensional approach is needed including increasing agricultural productivity, economic diversification, social protection and creating jobs."

The WG believe that by supporting initiatives to encouraging smallholder responsible forest management there are opportunities to alleviate some of these challenges that forests may provide. By accepting that this small scale/minimal conversion may have great social benefits FSC is able to contribute to alleviating poverty in this sector.

In relation to conservation benefits that may accrue from enabling minimal conversion the WG considered the changing climatic conditions affecting different parts of the globe in different ways. In light of these changing climatic conditions the WG accepts that minimal conversion may be required to support specific biodiversity objectives in different regions.

Question 7. Do you support the proposed principle 6 on small scale/minimal conversion?

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

Please explain
Section V: Compensation procedures

FSC Policy on Conversion is an overarching normative framework document, and FSC has established a TWG to work on integrating this Policy into the normative framework documents that are used on a day to day basis to actually implement the various FSC requirements.

Part of the work of this TWG will be to develop a Compensation Procedure, that may be used to verify compliance of associating organizations and organizations wishing to be certified to FSC standards. The previous wording of a Compensation Mechanism has been changed to reflect that there will be a formalized FSC procedure to verify compliance to the intent of this Policy.

The WG also considered the responses to each and every question that was asked during the first Public Consultation on this Policy draft and modified the relevant sections of the Policy to better reflect the aims and aspirations of the membership. As described in the Introduction to this consultation this analysis was done considering the views of the chambers in FSC, the north / south membership and the views of non-members who took the time to respond this consultation. For further information related to how WG addresses stakeholders and members’ suggestions related to compensation procedures, please refer to synopsis report for the public consultation of Policy Version 1-0 Draft 1-0 available under supporting document.

For the details on the revised Policy Principles please refer to FSC Policy on Conversion FSC-POL-01-007 Version 1-0 Draft 2-0.

Q8: Do you support the adjusted compensation procedures?
- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please briefly explain the rationale

Question 9: Do you agree with the proposed 5 years conversion free period?
- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please briefly explain the rationale

Question 10: Do you agree with the proposed principle 10 related to dispensation criteria for small-scale Smallholder?
- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly disagree

Please briefly explain the rationale
Generic comment

**Question 11: Do you have further comments on the second draft of the Policy on Conversion?**

Please provide your comments:
Thank you for your participation!

Thank you for your feedback.

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

We plan to hold webinars in English and Spanish for different time zones during the consultation. These webinars are an opportunity to understand development process and the proposals in the second draft of the FSC Policy on Conversion, and to ask questions to help you fill in the online consultation.

The information about the webinars will be published on the webpage of this process on the FSC Policy on Conversion webpage here.

Thank you!