



## **FSC International Generic Indicators (IGIs)**

### **First Consultation comments analysis & comparison of Draft 1 and Draft 2.**



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## **1.0 Consultation Draft 1-0 analysis**

### **1.1 Introduction**

Draft 1-0 of the International Generic Indicators (IGI) was released for a public consultation period of sixty days between February and April 2013. This draft had been through a chamber balanced working group process, with additional input from Regional Representatives and Certification Body Representatives providing technical expertise.

It was clear to the IGI Group that this was very much a first Draft and this was expressed in the introduction to the piece. The IGI Group, for example, had not had time to address Scale Intensity and Risk within the Draft. Although the Principles and Criteria Version 5 was approved by the FSC Membership a year earlier, there were still many issues where members were unclear of their scope and needed to see some key issues for their chambers addressed in some detail within the first Draft IGI in order to feel comfortable in signing off their release.

The consultation drew over 250 responses, both joint and individual from across the FSC membership and network. These responses were in the form of completed surveys submitted via Survey Monkey; letters highlighting major issues and opinion; and feedback from regional and national workshops.

### **1.2 Analysis of the Online Survey**

Following the consultation the process of analyzing the comments began with a quantitative analysis of the results of the online survey. This analysis highlighted some clear trends in terms of the responses received both within and across the chambers. The analysis focused the IGI Group on certain overarching issues in the Draft 1-0 IGI document that clearly needed to be addressed. It showed particular interest in Principle 6 and Principle 10 from those who responded. It also showed that there were relatively few responses from the Social Chamber and compared with multiple repeated responses from the Economic Chamber. To this extent the Survey Monkey quantitative analysis gave some qualitative insights into the consultation process and the potential for one chambers input to dominate the discussion within the working group.

### **1.3 Analysis of Sub Chamber feedback and Regional trends**

Both the results of the analysis of the online survey and the comments received from other sources were analyzed by the FSC Policy and Standards Unit Staff and by the IGI Group, including the Sub Chamber Representatives, the Regional Representatives and the Certification Body Representatives. Each member of the IGI Group was asked to make a report in preparation for the face-to-face meeting in Madrid in June 2013.

At the Madrid meeting, the IGI Group undertook to report on main issues they had identified and went through an exercise to group the comments received. Some significant trends emerged from this exercise that identified a series of issues to address as a priority. These issues were not unfamiliar



to the Working Group, but the consultation gave some useful insights into how to resolve some of these issues. These issues became known as the Meta Issues. This was the first course filter of the comments received.

The Meta Issues thus identified were grouped under four major headings:

- A. Reduce the number of indicators
- B. Simplify the language and content
- C. Focus on performance
- D. Address Scale Intensity and Risk

Each of these four major headings contained twenty to thirty sub issues to be considered in producing the next IGI Draft.

Only once these issues had been addressed could the group then see what comments were left to address through a fine filtering of the remaining comments.

#### **1.4 IGI Drafting Rules Filter**

Once the Meta Issues had been identified, a set of rules was then agreed to by the IGI Group, known as the Drafting Rules, which were then applied to the draft with the aim of resolving these issues across the whole IGI Draft. This list included filter questions for each indicator and then a list of rules to assist the Drafters edit the standard to address the Meta Issues.

#### **IGI Drafting Rules Summary:**

##### **Filter Questions**

Is this Indicator:

- Globally Applicable: Does the indicator apply to ALL types of forest?
- Performance based?
- Written in clear, simple language?
- Redundant?

##### **Drafting Rules summary**

- FSC-STD-60-002 Structure and Content: including SMART
- Precautionary Approach (recommended by the Plantation Review)
- Avoid duplication
- Cross reference
- National Adaptation for ILO & other
- Specific requirement not more general ones
- List methodology
- SIR Methodology



It became very quickly apparent that the Drafting Rules were a very efficient means to address a whole raft of issues that the IGI Group had been expressing since the process began and which were echoed by the consultation feedback.

The two most challenging issues to address have been Scale, Intensity and Risk and the lists that accompanied so many of the Indicators in Draft 1-0. The following methodologies were adopted for each:

#### 1. Scale, Intensity and Risk Methodology

The Scale, Intensity and Risk Methodology is addressed in its own paper, which accompanies this set of Drafting Rules and is summarised as follows.

For each Criterion with Scale, Intensity and Risk explicit in the Criterion:

- Provide interpretation note on how Scale, Intensity and Risk applies for that Criterion
- Identify scale, intensity, and/or risk as the key variable(s)
- If needed, refine or add to the indicator(s)
- Do not replace or undermine performance based indicators
- Produce Notes to express how Scale, Intensity and Risk should be considered by National Standards Developers
- Analysis to see if the outcomes can be similarly applied to other criteria.

#### 2. List Methodology

Lists are assessed on a case-by-case basis.

The following options have been developed for handling the lists:

- Retain as list within the Generic Indicator. Further adaptation may be required at the national level.
- Retain within a Note. National Standards Developers must consider and include how these aspects are addressed at the national level.

With 'Scale, Intensity and Risk' and the 'Lists', one of the most striking things was that these tend to be where national adaptation is needed and it is not possible to make globally applicable Generic Indicators. Notes within the IGI then most frequently address both issues. These notes are key to the national adaptation process.

### **1.5 Classifying and addressing Outstanding Issues**

Following the application of the Drafting Rules, a test was conducted against Principle 10, which had received a large volume of comments, to assess the extent to which the comments had been addressed by the application of the Drafting Rules. First the rules were applied to address the Meta Issues within Principle 10.



In a second step the team analyzed a sample of the comments from the consultation feedback. Submissions from each chamber were selected and each comment was analyzed to see if it had been addressed by the application of the Drafting Rules. It was evident from this analysis that over 90% of the comments received across the chambers had been addressed by the Drafting Rules. It was clear that we were on our way to a much-improved second draft at this stage.

However, the remaining 10% of comments would prove to be some of the most challenging to address. These remaining comments were filtered out and highlighted as Outstanding Issues.

The Outstanding Issues needed classification in order that they could be prioritized. The classification used was as follows:

Minor: Not substantive issues; brief discussion and decision on how to proceed.

Medium: Substantive / structural issue that may have ramifications across the IGIs.

Major: Well known to have strong, opposing opinions. Known to have ramifications across the IGIs.

These issues have been systematically addressed through bi-weekly conference calls between IGI Group members since the meeting in Madrid in June and also at face-to-face meetings in Vancouver in September and Lisbon in October 2013. FSC is indebted to those members of the IGI Group and IGI Team who have spent innumerable hours patiently debating and drafting Draft 2-0 of the IGIs and it is hoped that members and the network alike will recognize the huge effort that has gone into addressing the concerns they raised with the Draft 1-0 consultation.

## **2.0 Comparison of Draft 1-0 and Draft 2-0 of the International Generic Indicators**

### **2.1 Introduction**

The most major change between Draft 1-0 and Draft 2-0 has been produced by a consistent application of the Drafting Rules to Draft 2-0 and addressing the Meta Issues identified from the consultation feedback. Here, each of the Meta Issues is taken in turn and a summary given of the effects of the Drafting Rules in addressing the Meta Issue.

### **2.2 Identified Meta Issues**

#### **A. Reduce the number of indicators**

The Drafting Rules that had most effect on reducing the number of indicators are avoiding duplication and cross-referencing. Further identifying those indicators, which are outside the scope of the Criteria, has helped to a certain extent in this regard, but has not always been easy to agree upon.



Redundancy refers to: duplicative indicators: If 100% duplicative delete the most extraneous one(s); indicators with very similar requirements that can be merged; and indicators that merely repeat the criterion. Where possible, cross-referencing has been used, but this has largely arisen in the Notes.

In Draft 1-0 an attempt was made to ensure that there was a flow in the indicators across the whole set of IGI. This has been built on in Draft 2-0 by a more regimented grouping of indicators that cover a certain topic under one Criterion rather than scattering them throughout the standard. One major breakthrough was in gathering all elements of Engagement into Principle 7; where all Engagement needs to be planned; and cross-referencing to the various parts of the standard where Engagement needs to be implemented.

The following table shows the reduction across the board in the number of indicators from Draft 1 to Draft 2. There is an overall reduction of 145 indicators, which is a 43% reduction.

Principle	P1	P2	P3	P4	P5	P6	P7	P8	P9	P10	Total
<b>Draft 1</b>	32	33	31	46	24	58	27	16	17	58	<b>342 indicators</b>
<b>Draft 2</b>	21	22	16	21	14	32	12	11	13	35	<b>197 indicators</b>

#### B. Simplify the language and content

This comment came largely from stakeholders who are non-native English speakers, but also in relation to several new terms used in the IGI Draft 1.0.

The methodology has been to identify opportunities to simplify language and provide definitions for new terms and check against the review of indicators that have been flagged by stakeholders as having unclear language. This has resulted in simplified, less technical language and more concise indicators.

#### C. Focus on performance

There is a GA Motion from 2011, which calls for a greater focus on performance in the field as opposed to systems approaches. This does not rule out systems base indicators but serves to prefer those indicators that promote good field performance. The methodology applied has been to identify opportunities to refine relevant indicators to more clearly focus on concrete, verifiable outcomes. The IGI Group has also sought to identify opportunities to streamline indicators that are more “process” oriented, while recognizing that some “process” indicators are necessary to implement the P&C, implement the intent/elements, address other inputs to the IGIs per the IGI Group Terms Of Reference and provide the necessary foundation for subsequent performance indicators. They also checked against review of indicators that have been flagged by stakeholders as being problematic or otherwise needing improvement in terms of their performance orientation.



#### D. Address Scale Intensity and Risk

The Scale, Intensity and Risk Methodology that was developed by the IGI Group during the Madrid meeting is summarized below:

For each Criterion with Scale, Intensity and Risk explicit in the Criterion:

- Provide interpretation note on how Scale, Intensity and Risk applies for that Criterion
- Identify scale, intensity, and/or risk as the key variable(s)
- If needed, refine or add to the indicator(s)
- Do not replace or undermine performance based indicators
- Produce Notes to express how Scale, Intensity and Risk should be considered by National Standards Developers
- Analysis to see if the outcomes can be similarly applied to other criteria.

The application of this methodology has resulted in a series of Notes for National Standard Developers to adapt at the national level. Given that Scale, Intensity and Risk are so variable across and within regions, it was not possible to produce generic indicators to address every situation. A broad approach has also been taken to make the wording of the indicators applicable to all scales of forest operation. It was felt by many that the language used in Draft one was focused on large operations and so this has been changed as far as possible throughout.

### 2.3 Addressing Major and Medium Outstanding Issues

The following issues came up during the drafting of Draft 1- 0 and were echoed in the consultation as needing to be resolved during the overall IGI process. They have been resolved in Draft 2-0 and the IGI Group will seek to refine these solutions through the consultation process on Draft 2-0 and into the final draft.

#### ***Major Issues***

##### **The Normative nature of lists**

The normative nature of the lists was raised as an issue that became the issue of the normative nature of the Notes. This has been resolved through the application of ISO verbal form being used in the Notes, so that a Note phrased as a 'shall' must be complied with, 'may' is an option, 'should' is the general norm but not a must. This has been further clarified through the IGI Transfer Procedure.

##### **The use of Expert Review of assessments**

This issue was resolved through the development of a 'Best Available Information' approach to indicators where the need for expert review may apply in certain higher intensity and higher risk situations. It was recognized that expert review was not always needed, but may be useful, particularly in controversial situations.



### **Annual Allowable Cut**

There is a much-simplified set of indicators and methodology to identify the annual allowable cut and rationale for where this may vary.

### **Free, Prior and Informed Consent (FPIC) and to whom it applies**

This issue, which crops up in both Principle 3 and Principle 4 in relation to Indigenous Peoples and Communities has largely been resolved by the focus on 'rights'. Identification of the particular rights a community may hold is a key first step in the approach and is expressed in the Notes in the criteria where it occurs. These identified rights are then used as the basis for when Free, Prior and Informed Consent is needed.

### **Community Engagement Strategy**

The approach taken through FPIC in identifying 'rights' has meant that this approach can be taken rather than requiring that all operations have a specific strategy to engage rights holders. Such a strategy may still be a valuable tool in higher risk and larger operations, but not for small and community operations for example.

### **ILO Conventions**

Which parts of the ILO Conventions apply directly to the certificate holder, rather than at higher level to government has been resolved through reference to the lists taken from the Explanatory Notes in Version 5 of the Principles and Criteria. These lists are now available from the Policy and Standards Unit.

### **Responsibility for Contractors versus Employees**

The revised Principles and Criteria Version 5 is clear in the Preamble that the requirements of the standard apply equally to contractors and employee.

### **List of training requirements**

All training requirements are now listed under 2.5.

### **Disputes resolution**

Requirements for disputes resolution have been aligned as far as possible across criteria 1.6, 2.6 and 4.6.

### ***Medium Issues***

#### **Addressing all environmental values under 6.1**

In Draft 1-0 the list of environmental values and how to assess each of them was not explored in much detail. There has been progress on this in Draft 2-0, including a streamlining of the requirements, particularly in relation to small, low intensity and low risk operations. Further work is underway within the FSC Environmental Services Program and we are expecting further tools to emerge from the program to aid certificate holders in this new and emerging area.



**‘Identified and documented’ versus ‘planned and implemented’**

This issue was largely resolved by looking at this in terms of the performance-based approach. This meant that the ‘planned and implemented’ approach was adopted under 6.3, where this first came up and across the standard as far as possible. There has also been a great deal of merging these process type indicators which throughout.

**Regeneration & silvicultural objectives**

Where regeneration and silvicultural objective should sit within the standard was an issue resolved through placing them all in Principle 10, rather than also in Principle 6 or 7.

**Externalities**

The meaning of this term and how externalities may be assessed proved quite perplexing to many in Draft 1-0 and is a term introduced by the ‘Principles and Criteria Version 5’ under Criterion 5.3. A Note has been added which explores these issues.

**Anti Corruption**

Where anti-corruption laws and regulations do not exist or are ineffective, there is now expressed, through a Note suggestions for addressing this at the level of the Organization.

**Identifying the range of species under Criterion 6.6**

Many stakeholders were concerned that under Criterion 6.6 the organization was expected to identify all naturally occurring species. This was not the intention. The term the ‘range’ of species implies that a comprehensive survey may not be needed and habitat approaches to identify the likely range of species is emphasized in Draft 2.

***Minor Issues***

Many minor issues were also identified and addressed between Draft 1 and Draft 2. Please refer the drafts in order to identify issues of particular interest.