Report on the First Public Consultation of the FSC US Controlled Wood National Risk Assessment

FSC US began development of a Controlled Wood National Risk Assessment (NRA) in 2012 by assembling a working group. With input from the working group, FSC US developed a first draft NRA for Categories 3 and 4 and held a public consultation early in 2015. During the consultation, FSC US held three webinars to discuss the draft NRA, the Controlled Wood system, and the public consultation. Over 100 stakeholders registered for the three webinars.

FSC received comments from 34 stakeholders during the 2015 public consultation. Of these 34 stakeholders, 26 were economic stakeholders (including 21 certificate holders, 2 certification bodies, and 3 non-certified companies) and eight were environmental stakeholders (including 4 FSC members and 4 non-member organizations).

The following is a summary of the key issues identified during the consultation and how they were addressed in the second draft. The individual comments on the first draft of the NRA are presented in Annex A. For confidentiality, the names of individual respondents have been omitted in this report. All comments were analyzed and considered by the original working group, FSC US, and the Technical Advisory Group when developing the second draft of the NRA.

Key Issue: Centralized National Risk Assessments (CNRAs)

The first draft of the NRA included only assessments for Categories 3 and 4, while FSC International led separate but concurrent public consultations for the Category 1, 2, and 5 CNRAs from March 2 – April 2, 2015. This short consultation timeline for the CNRAs was difficult for US stakeholders and they expressed frustration that the NRA and CNRAs were consulted separately.

The following is a summary of stakeholder comments from the first public consultation:

- There are challenges with the Category 2 (Traditional & Civil Rights) CNRA, primarily related to the focus on requirements of the ILO Core Conventions.
- The second public consultation should include the CNRAs and be long enough so stakeholders have time to adequately review the content alongside the NRA.

The draft of the CNRA for Category 2 that was prepared by a consultant on behalf of FSC International proposed specified risk designations for two indicators: 1) regarding violations of workers' rights, specifically the right to organize and to collective bargaining, and 2) regarding violations of indigenous peoples' rights. FSC US worked with experts in these areas to identify additional sources of information and to look more closely at the situation in the forest sector.

The draft CNRA content related to workers' rights focused on requirements of the ILO Core Conventions which have not been ratified by the United States. FSC US' additional assessment for the second draft NRA re-focused on requirements under the ILO Fundamental Principles and Rights at Work, whether there is evidence of widespread violations of these workers' rights, whether there is evidence of effective processes for addressing violations when they occur, and whether there is widespread violations of rights specifically in the forest sector.

The draft CNRA content related to indigenous peoples' rights broadly assessed historic and recent violations of rights throughout the entire US across all sectors. FSC US' additional assessment for the second draft NRA provides information about more recent changes in tribal relations at the federal level and re-focused on whether there is evidence of widespread violations of rights specifically in the forest sector.

For each of these indicators, the conclusion from the additional assessments was that there is a low risk of sourcing unacceptable materials. The additional information and assessments for Category 2, along with the finalized CNRAs for Categories 1 and 5, have been incorporated into the second draft of the NRA. Therefore, the second public consultation draft contains risk assessments for all five Controlled Wood Categories.

Key Issue: Supplier Agreements

The first draft of the US NRA required certificate holders to have supplier agreements for all of their direct suppliers and some indirect suppliers. These agreements were to contain information to help implement control measures. There was a lot of discontent around this idea from stakeholders. Many questioned if there was a reasonable alternative to supplier agreements. Stakeholders also questioned what the consequence might be of making supplier agreements an option but not a requirement for direct purchases.

The following is a summary of stakeholder comments from the first public consultation:

- Supplier agreements will be costly and time consuming to implement, particularly for primary mills that may have hundreds of direct suppliers.
- Certificate holders have expressed concerns about the liability of signing a document saying that they will do certain things, even if they agree with the intent. This is of particular concern for the vaguer requirements such as maintaining habitats and landscapes.
- Supplier agreements are at the core of potential anti-trust concerns.
- There is strong perspective that requiring a control measure as stringent as supplier agreements is not proportionate with the rigor of the HCV analysis.
- Supplier agreements for Type 1 Indirect Purchases have created a lot of confusion.

Requirements for supplier agreements have been removed from the second draft of the NRA. The supplier agreements included in the first draft of the NRA were intended to ensure that each individual supplier complied with the Controlled Wood program and that the control measures were effective at the scale of the supply area. The revised control measures for the second draft were designed for compliance verification of certificate holders and for effectiveness verification at a landscape scale rather than for the individual supply unit or harvest area. FSC US believes that this approach negates the need for certificate holders to request suppliers to provide information from sub-suppliers.

Key Issue: Independent Landowners & Antitrust Concerns

Many comments from stakeholders on the first draft of the NRA were related to antitrust concerns with various aspects of the proposed requirements. FSC US will need to be conscious of concerns around anti-trust that have been brought up as part of the first consultation.

The following is a summary of stakeholder comments from the first public consultation:

- There is concern that the standard development process does not accommodate meaningful representation from non-certified landowners.
- In particular, there is concern over supplier agreements and other mandatory measures that would potentially require wood exclusion.
- Supplier agreements and conversion are at the core of potential anti-trust concerns.

In response to concerns raised by forest industry representatives, FSC US contracted with an attorney to complete an analysis of the US antitrust risks associated with the first draft NRA in 2013. Their conclusion was that the NRA should be found lawful if challenged under US

antitrust law. Following the 2015 approval of the revised Controlled Wood standards (FSC-STD-40-004 v3-0) that included new requirements, FSC International contracted with the same attorney to review the issues in 2017. Again, the conclusion was that the revised standard did not raise substantial antitrust risk "so long as FSC continues to engage in an open and balanced process to set standards for voluntary certification and maintains safeguards to minimize the risk of exclusionary conduct by participants, such standard setting should be found to be procompetitive and lawful."

Additional concerns were related to the process of identifying areas of specified risk, which could potentially result in areas that were previously available but now must be avoided during harvest. The concern is that this process could result in a 'group boycott' of and economic harm to non-certified landowners, particularly in sectors or regions where a landowner only has the option to sell to CoC/CW certificate holders. The 2017 attorney review found that this concern does not raise substantial antitrust risk. The following aspects of the second draft of the NRA also address this issue:

- FSC US will provide educational materials that may be used by certificate holders to fulfill one of the control measures and therefore the certificate holders themselves will not be required to determine what guidance is shared.
- The collaborative dialogue at the regional meetings will result in a set of mitigation
 actions, development of this set of actions will include a diversity of stakeholders beyond
 just certificate holders, and certificate holders will not be asked at the meetings which
 action(s) they will implement. They will make a decision independently after the regional
 meeting is over and FSC US has shared a meeting report.
- Non-certified landowners will be encouraged to participate in the dialogue at regional meetings so that they are part of identifying the set of mitigation actions.
- The second draft of the NRA clearly states that there are pathways for appeals, complaints, and disputes, whether through the compliant process detailed in the controlled wood standard, or through direct communication with FSC US.
- The regional meetings and any published guidelines will include explicit statements that no price, volume, or cost information should be shared by meeting participants.

Another area of stakeholder concern with the first draft NRA was related to the requirements for information from sub-suppliers and the potential for antitrust violations, particularly in complex supply chains where certificate holders may be competitors, customers, and suppliers all at the same time. The controlled wood standard only requires information from sub-suppliers if it is necessary to implement control measures. By addressing risk mitigation and effectiveness verification at a landscape scale instead of at individual supply units or harvest areas, FSC US believes that the approach taken in the second draft of the NRA negates the need for certificate holders to request suppliers to provide information from sub-suppliers. These agreements are no longer required.

Key Issue: System complexity

The complexity of the first draft of the NRA led to a lot of confusion about what companies actually need to do to implement the FSC Controlled Wood system and that the costs are much greater than the benefits. There was additional concern that small mills do not have the capacity to implement such a complex system.

The following is a summary of stakeholder comments from the first public consultation:

• The overall structure, content, and length of the NRA has led to substantial confusion around what companies need to actually do to implement the CW system.

- The piecemeal development of the NRA is also a major source of confusion. That is, developing the NRA, CNRA, and CW Standards on different timeframes with separate consultations.
- In the NRA, background information is interspersed with the actual requirements for compliance. This makes it difficult for companies to identify all the points of compliance, especially related to HCVs.
- There is substantial concern that the complexity of the NRA will be a significant barrier to entry for small and medium sized Certificate Holders. This barrier will in turn reduce access to markets for FM certified material. Even where CHs are not fully precluded from the system, there is significant concern over the consequences of additional costs without clear benefits.

Efforts have been made to greatly simplify the second draft of the NRA, both in the structure of the document and also by ensuring that elements addressed in the new Controlled Wood standard (FSC-STD-40-005 V3-0) are not duplicated in the NRA, including the removal of a Due Diligence System requirement from the NRA. Additionally, the scale of risk designations has been changed to make it easier for certificate holders to determine whether they need to address risk without acquiring additional ecological or occurrence information.

The following aspects of the second draft of the NRA also reduce the complexity related to implementing the FSC Controlled Wood system:

- FSC US will provide educational materials that may be used by certificate holders to fulfill one of the control measures and therefore the certificate holders themselves will not be required to develop materials or determine what guidance is shared.
- The collaborative dialogue at the regional meetings will result in a set of mitigation actions from which Certificate holders will select one or more actions to implement, instead of having to develop mitigation actions themselves.
- The division between direct and indirect purchases has been removed, and mitigation for all sourced materials will occur in the same manner.
- The NRA has also been incorporated into the FSC International template as is required by the FSC procedure.

Key Issues: HCV Classification & Risk Designations

Based on stakeholder comments of the first draft NRA, FSC US needs to review how HCV are described and defined (e.g. Priority forests). The HCV need to be aligned with recognized classification systems. FSC US also needs to review which risk designations have a large impact in the system and whether or not any are worth removing or adding.

The following is a summary of stakeholder comments from the first public consultation:

- The ecosystem / habitat classifications used in the NRA do not use commonly accepted ecosystem classification systems.
- The NRA does not assess the adequacy of current programs and laws that already address these ecosystems. Comments suggested that many of these designations, particularly those for Priority T&E species, fail to consider current regulatory protections like the Endangered Species Act.
- The species and habitat HCV designations, including Priority T&E Species, habitats within Critical Biodiversity Areas, and Priority Forest Types are considered by some stakeholders to be arbitrary designations. Stringent control measures cannot be placed on species or ecosystems without stringent justification.

• The "quantity and quality" and "maintain across the landscape" clauses associated with HCV specified risk designations are not implementable as control measures. They can be stated goals, but not the performance outcome.

FSC US has addressed these specific stakeholder concerns listed above in the following ways:

- HCV 1 species identification are now based upon data and information publicly available from NatureServe. NatureServe is well respected within the environmental and other communities due to the high standards and scientific rigor used in their data collection and analysis processes.
- Critical Biodiversity Areas as distinct spatial areas are identified as HCV 1, with recognition that there are important habitats that occur within them that drive the high biodiversity of the area, but strict definition of those habitats is no longer essential.
- Identified HCV have been more thoroughly assessed for protections and for threats from forest management activities, with some conclusions of 'Low Risk' as a result
- The 'quantity and quality' and 'maintain across the landscape' clauses associated with control measures have been removed

FSC US, in partnership with the Technical Advisory Group, primarily built on the Category 3 framework developed by the original working group. In order to meet the NRA content and procedural requirements, much additional work was carried out to document and provide rationale for the risk designations (both low and specified). The goal was to ensure that the risk designations were not just based on the presence of a particular HCV within an area, but also on an assessment of whether or not the HCV is threatened by forest management activities. The Category 3 detailed assessments and associated documentation that provide rationale for the risk designations have been included in Annex E of the second draft of the NRA. The assessment used to develop the second draft of the NRA resulted in proposed specified risk designations for specific HCV 1 and HCV 3 within some of the FSC US Regions, but not all.

A significant difference between the approach of the original working group and the work done on the second draft was how individual species were identified as potential HCV 1. Instead of basing this identification on expert opinion, as was done by the original working group, the new approach used NatureServe data as the basis for a systematic approach to identifying HCV 1 priority species. The resulting species list was quite different than in the first draft NRA, but based on the definitions of HCV 1 and other available guidance, FSC US believes that the methodology used is defensible.

Key Issue: Conversion

Stakeholder comments on the first draft of the NRA challenged FSC US to consider if Conversion should be moved to specified risk, given that the Due Diligence System around it essentially treats it as specified risk. Comments also encouraged FSC US to better address plantations given the very complex FSC definition of "P10" plantations.

The following is a summary of stakeholder comments from the first public consultation:

- Many economic stakeholders feel that avoidance of conversion is not warranted given that forest management decisions are not the drivers of conversion, and the material will be wasted if not used.
- Stakeholders commented that it is often not evident at harvest if a forest has been converted. Conversion depends on the intent of the landowner after harvest takes place.
- Stakeholders felt that there is a "lack of compelling need" to control for conversion given that landcover was shown to be relatively stable.

• There is a lot of confusion around the definition of Plantations in FSC. This distinction will be difficult to implement in supplier agreements or training.

FSC International provided a draft CNRA for Category 4 that included an assessment of applicable legislation that has been incorporated into the second draft NRA. The US does not have comprehensive legislation that prohibits conversion, so it was necessary to further assess the rates of conversion in the US to determine risk. The original working group focused on data analysis to try and determine if the rates of conversion in the assessment area (the conterminous US) exceeded the threshold established by FSC International for low risk. Due to the resolution of the data available, it was not possible to conclude whether or not the threshold was exceeded as the threshold was smaller than the margin of error of the data analysis. This conclusion led the original working group to propose a specified risk designation for the entire assessment area.

The Technical Advisory Group disagreed with this approach and asked FSC US to identify additional sources of information that could help to determine the risk of conversion at a finer scale for the second draft of the NRA. FSC US reviewed available literature and regional datasets. This literature review clearly indicated that conversion is a more significant issue in the Pacific Coast and Southeast regions, which aligned with the general conclusions of the original data analysis. The literature review also indicated that urbanization is the primary driver of conversion in these regions. FSC US used state-scale data on urbanization to guide the determinations of specific risk within the Pacific Coast and Southeast regions and a portion of the Mississippi Alluvial Valley region. The assessment and associated documentation have been included in Annex G of the second draft of the NRA.

FSC has clearly articulated that the consideration of risk of materials from areas of conversion is required, even if the conversion is not due to forest management activities. Although stakeholder comments felt that avoidance of materials conversion is not needed because urbanization is the main driver of conversion in the US, conversion remains as specified risk for some portions of the US in the second draft of the NRA.

The second draft of the NRA also maintains the distinction between natural forest, semi-natural forest and plantations, but directs users to the FSC US Plantation guidance for assistance. Additional clarification has been included to further explain that just because a stand is planted, it is not necessarily a plantation.

Key Issue: Due Diligence System (DDS)

The first draft of the NRA contained requirements for a company to develop a DDS. It was originally included to simplify the conversion framework, but may not have achieved this purpose. The DDS in the first draft of the NRA also included a Stakeholder Portal. This Stakeholder Portal was intended to be a database that contained known and specific stakeholder concerns related to the Controlled Wood categories of risk. The Portal was to be provided to inform the DDS for low risk areas. This idea was an area of major discontent among stakeholders.

The following is a summary of stakeholder comments from the first public consultation:

- The DDS creates confusion since it requires additional analysis beyond the NRA's low risk designations. Some stakeholders feel this is a risk assessment within a risk assessment.
- The DDS & Stakeholder Portal are felt to be redundant with the DDS and complaints mechanism in STD-40-005.

- The burden of proof required by the DDS is unclear. Specifically, the requirement to "consider" the stakeholder portal is unclear.
- The Stakeholder Portal is a major source of contention. Organizations feel that it unnecessarily opens them up to liability.
- There are strong feelings from stakeholders that if the Stakeholder Portal is retained, it needs to be carefully curated by FSC US.

A DDS is now required as a part of conforming to the Controlled Wood standard (FSC-STD-40-005 V3-1), so it is no longer included as a required element of the second draft of the NRA. The Stakeholder Portal has also been removed from the second draft, though there are still avenues for stakeholders to relay any concerns they have related to the Controlled Wood categories of risk. The regional meetings are open to all stakeholders, so any concerns that may have been brought to the stakeholder portal can be addressed through the collaborative dialogue during the meeting. The second draft of the NRA also clearly states that there are pathways for appeals, complaints, and disputes, whether through the compliant process detailed in the controlled wood standard, or through direct communication with FSC US.

Key Issue: Supplier training

The first draft of the NRA contained a requirement that certificate holders train their suppliers in the effective implementation of the company's controlled wood policy, and the control measures required to address specified risk.

Stakeholder comments received during the first public consultation suggested that the supplier training requirement was interpreted to be a much more stringent requirement than was intended by FSC US. The requirements to pass training as far down the supply chain as necessary were received by stakeholders as unclear and impractical for certificate holders to implement. Comments also suggested that there is strong support for an FSC US led regional process to clarify and implement supplier training process in a way that is not interpreted by certificate holders as overly burdensome or punitive.

While providing educational materials to suppliers is still included as a control measure in the second draft of the NRA, supplier training is not. FSC US intends to provide educational materials for topics associated with specified risk that may be used by certificate holders to fulfill this requirement. The educational materials will meet goals similar to the trainings required in the first draft. The educational materials will be designed to provide information about why there is a specified risk designation, a statement that materials are avoided if they come from areas where conversions larger than 100 acres are taking place or where HCVs are threatened by forest management, and guidance for mitigating risk and/or avoiding sourcing from these areas.

Annex A - Compilation of all comments received

List of all commenters

American Forest and Paper Association	Economic
Appvion, Inc.	Economic
Boise Cascade	Economic
Columbia Forest Products	Economic
Dogwood Alliance	Environmental
Domtar Paper Co.	Economic
Drax Biomass	Economic
Enviva	Economic
Evergreen Packaging	Economic
ForestEthics	Environmental
Georgia-Pacific	Economic
Glatfelter	Economic
Green Press Initiative	Environmental
Greenpeace US	Environmental
Hancock Timber Resource Group	Economic
International Paper	Economic
J.D. Irving, Limited	Economic
KapStone Kraft Paper Corporation	Economic
Klamath Siskiyou Wildlands Center	Environmental
MeadWestvaco	Economic
Mendocino Redwood Company, Humboldt Redwood Company,	
Mendocino Forest Products, All Weather Wood	Economic
Michigan Department of Natural Resources	Economic
National Association of Forest Owners	Economic
National Council for Air and Stream Improvement, Inc.	Economic
Natural Resources Defense Council	Environmental
Oregon Wild	Environmental
Rainforest Alliance	Economic
Resolute Forest Products	Economic
Resource Management Service, LLC	Economic
RockTenn	Economic
SCS Global Services	Economic
Sierra Club	Environmental
Verso Corporation	Economic
Weyerhaeuser	Economic

Compilation of all c	omments received			
Clause	Comment	Recommendation	FSC US Response	Chamber Affiliation
Part 1: Company Co	ontrolled Wood Program & DDS			
		Change "make controlled claims" to "make controlled wood claims or mix into an	Thank you for your comment. Alaska	
	"This document contains programmatic requirements for organizations to make controlled wood claims for uncertified materials source from the conterminous United States." Why is Alaska left out? Also, a company is	FSC mix claim". Alaska really should be included. Is it no man's land then? No one	remains outside of the scope of the FSC US Controlled	
I. Program Elements	not always wanting to make controlled wood claims - 95% of the time, companies are wanting to mix it with their other FSC stocks to have a mix label – not make a controlled wood claim which is entirely different.	shall ever source controlled material from there ever?	Wood Risk Assessment.	Economic
		Use language from the actual Controlled Wood standard in the NRA, leave Part I out of the NRA, the NRA should include only the results of the NRA, risk		
	Part 1 of the FSC US NRA includes different vernacular, definitions, and requirements than the requirements in the FSC Controlled Wood Standard, FSC STD 40-005.	designations, justification, source of information, and the applicable control	FSC US has aligned the second draft of the risk assessment	
	This is going to cause issues for Certificate Holders and Certification Bodies; questioning whether or not we (CHs and CBs) are to follow the requirements of Part I of the NRA or the requirements of the actual controlled wood standard. ASI will audit CBs to the controlled wood standard.	measures. The other data from Part II and Part III should be available as	with the approved Controlled Wood standard so that	
I. Program Elements	Comments below include inconsistency between the NRA and the actual standard language	appendices for reference. Keep it user friendly.	elements are not duplicated.	Economic
	Anyone (there are over 11 million forest owners in the U.S.) who sells wood directly or indirectly to any company with an FSC CoC certificate will fall under the Controlled Wood requirements. The only exception is sale of residual chips. So if, for example, a landowner sells logs through a logger that go in part to a sawmill and in part		The revised control measures for the second draft were designed to include compliance and effectiveness verification at a landscape scale rather than for the individual supply unit or harvest area. FSC US believes that this approach negates the need for certificate holders	
I. Program	to a chip mill, and a company with an FSC CoC certificate buys from the chip mill, all of the landowner's harvesting will fall under the Controlled Wood standard. Even if the FSC buyer is several steps removed, the standard requires that the buyer implement a series of contracts through which their immediate suppliers impose requirements on their suppliers, and so on, until the requirements reach all landowners in the supply		to request suppliers to provide information from	Faculti
Elements	area. The Table of Contents is much too brief to be helpful and it's confusing to have three separate TOCs for one document.	If the NRA is intended to be a single, contiguous document there should be	sub-suppliers. FSC US has updated the document's	Economic
I. Program Elements	The use of roman numerals to designate the three separate parts of the document as well as the sub-sections is confusing (ex: Part III, Section III).	one TOC at the beginning and all the pages should be	structure in the second draft	Economic

	-	1	1	
		numbered consecutively		
	There does not seem to be a summary of risk findings. This is a very useful resource for CBs who have to manage	(currently, Part III contains		
	the findings of multiple NRAs.	no page numbers).		
		Re-organize the numbering		
		structure such that roman		
		numerals are not used to		
		designate both Parts and		
		Sections.		
		Include a table at the		
		beginning of the document		
		which provides a summary		
		of risk designations. This		
		doesn't need to be simple –		
		e.g. see the summary table		
		for Chile natural forests.		
		TOT CHIE HALLI AL TOTESLS.	Dialahaa haaa	
			Risk has been	
			assessed at a finer	
			scale in the second	
			draft. As a result,	
	Complexity creates confusion, confusion produces many interpretations, many interpretations leads to gaming		no specified risk	
	the system, the system then loses its integrity and we all become complacent in applying principles of good		designations are at	
	forestry.		a national level.	
	A national level risk assessment is too cumbersome to navigate and implement.		This will assist	
	National stakeholders involved in development of the NRA do not have the knowledge about local resources nor		certificate holders	
	the best interests at heart to develop an accurate risk assessment or proper control measures that match a		in deciding	
	·		_	
	localized region.		whether or not	
	Did the European Union develop a risk assessment for the entirety of their political boundaries? No, each	Establish risk assessments	they areas of	
	country has their own risk assessment. Each state in the US are legally sovereign and should be allowed to	on regional (ie SE, NE or	specified risk are	
I. Program	develop their own risk assessment. FSC FM standards are regionally based. Why would risk assessments be	Western), state or	within their supply	
Elements	handled differently?	ecosystem levels.	areas.	Economic
		Please reference the version		
		of the document (40-005 V3-		
		0 DRAFT 2-0) reviewers are		
		to utilize in their review of		
		this document. Comments		
		on this document may		
		•		
		change as changes to that		
		document occur. I'm not		
		repeating this comment		
		everywhere this occurs, but		
		please reference the most		
		current draft document		
		where you refer back to 40-		
		005.		
	It's difficult to understand what the exact requirements will be under FSC-STD-40-005 since the final version has	To the maximum extent		
	not yet been released. For review purposes, it's appropriate to put reference the version that reviewers are	possible, best to define the		
	supposed to review for their comments (i.e. FSC-STD-40-005 V3-0 DRAFT 2-0). It's not transparent or ok for FSC	requirements or references		
		•	The second draft of	
	to claim a fair and honest review process when many of the elements of this NRA depend on what the final	from 40-005 in this	The second draft of	
	version of that standard (40-005) will look like. For the purposes of this review, I utilized V3-0 DRAFT 2-0, major	document, this will require	the NRA aligns with	
	changes to that draft may change my comments related to this National Risk Assessment	FSC-US to maintain an up-to-	the approved CW	
		date document with 40-005,	standard FSC-STD-	
1.1 NOTE	I think the QMS is worthy of its own description in this document – rather than referring back to 40-005.	but this is really the right	40-005 v3-1	Economic

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		with or sold as a mixed		
		credit product.		
		Controlled Wood Policy		
		should address a		
		commitment to the policy		
		overall. The policy should		
		address in general terms,		
		the five categories of		
		_		
		potential risk (Legality;		
		Traditional & Civil Rights;	A Controlled Wood	
	Company Controlled Wood Policy and Description of Supply area: The proposed standard seems to go beyond a	High Conservation Values;	Policy is no longer	
	public commitment to a controlled wood policy. Of concern are the specificity of the supply area and material	Forest Conversion and	required in the	
	types and the summary of a program to implement the controlled wood program. The supply area can be	Genetically Modified	second draft of the	
II. CW Policy	described in general terms and on a larger scale.	Organisms).	NRA.	Economic
			A Controlled Wood	
	The requirement for a publicly available Controlled Wood Policy inappropriately includes descriptions of the		Policy is no longer	
	supply area, areas of specified risk and associated control measures and a summary of the Company Controlled		required in the	
	Wood Program. These requirements for information exceed what normally would constitute a public policy		second draft of the	
II. CW Policy	statement of commitment to avoid controversial sources.		NRA.	Economic
2.1 Policy	statement of commitment to avoid controversial sources.		INIVA.	LCOHOITIC
Elements				
Liements			A DDS is now	
			required as a part	
		Change DDS section and	of conforming to	
		requirements to	the Controlled	
	The controlled wood standard is placing a higher change impact requirement on lands that are under a long term	acknowledge third party	Wood standard	
		1 ' '		
	wood supply agreement and enrolled in other forestry certification systems that carry an accreditation and are	certifications as meeting	(FSC-STD-40-005	
	globally recognized and endorsed. Those lands are audited to ensure BMPs are implemented and stand level	control measures for HCVs.	V3-1), so it is no	
	characteristics are preserved. Those audits also ensure that staff have adequate training on implementation and	Change DDS to remove all	longer included as	
	foster a trained workforce. Contract language is also in place to maintain these certifications where wood supply	required monitoring from	a required element	
	agreements are in place. The current standard has a costly impact and time impact on 3rd party certified lands	certificate holders on third	of the second draft	
III. CW-DDS	where the time/impact could be better spent with monitoring of non certified lands.	party certified lands.	of the NRA.	Economic
	The current NRA relies heavily on a new Due Diligence System (DDS) designed to set out Certificate Holder's		A DDS is now	
	responsibilities when they encounter unacceptable sources in areas not designated specified risk. The DDS		required as a part	
	system is an important compromise that allows risk to be designated in more granular areas while still		of conforming to	
	addressing key concerns of the environmental chamber regarding system integrity and environmental		the Controlled	
	performance. But this compromise proposal appears to rest on uncertain footing.		Wood standard	
	Facilities and compression of popular appears to rest on anicolaum rooming.		(FSC-STD-40-005	
	It is currently unclear whether FSC International will support the mandatory DDS requirements in areas where		V3-1), so it is no	
	there is not specified risk. If somehow FSC US is unable to move forward with this system, we believe the draft		longer included as	
	, ,		U	
	NRA would not sufficiently protect against risk to HCVs and conversion across the landscape. Without the DDS, it		a required element	
	could be necessary to designate "risk" for these values in other places across the landscape to insure that		of the second draft	
III. CW-DDS	mandatory control measures are taken to control for the risk.		of the NRA.	Environmental
	The Draft NRA is Incomplete. FSC-US has only addressed two of the five controversial sources governed by the			
	Controlled Wood system: HCVFs and Conversion. The other three controversial sources (legality, indigenous			
	rights, and GMOs) areas were evaluated by firms in the United Kingdom and put out for public comment only			
	recently. No information has been provided about how the outcomes of these other evaluations will be		The second draft of	
	incorporated into the (partial) draft NRA currently out for comment. Participants should not be forced to		the NRA contains	
	conduct piecemeal review and comment on portions of the draft NRA, which will ultimately be combined into a		risk assessments	
	single comment. The draft US NRA should be withdrawn, combined with the other three elements by a newly		for all five	
	constituted working group that includes materially affected landowners, and re-released for comment after the		controlled wood	
III. CW-DDS	full assessment is available.		categories.	Economic
111. CVV-DD3	ועוו עשטכשוויבויוני וו מעמוומטוכ.		categories.	LCOHOITIC

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Due Diligence system for all inputs. It appears that the Controlled Wood program is being designed for more A DDS should not have to a required element
than it can accomplish This section specifically notes that even if there is a low risk, the DDS "is designed to develop a program for low of the second draft
3.1 DDS req. avoid those sources." If a risk is determined as low, then the due diligence should stop there. risk designations. of the NRA. Economic
A DDS is now
required as a part
of conforming to
the Controlled
Wood standard
(FSC-STD-40-005
The requirement to implement a Due Diligence System for all inputs, regardless of risk designation, imposes V3-1), so it is no
controls and requirements on all courses of wood supply without the assessment of risk. FCC Cartificate Holders
controls and requirements on all sources of wood supply without the assessment of risk. FSC Certificate Holders 3.1 DDS req. do not have the authority to exert control measures on independent loggers and landowners. longer included as a required element Economic

			of the second draft	
			of the NRA.	
			A DDS is now	
			required as a part	
			of conforming to	
		Identification of the problem	the Controlled	
		·		
		will help participants	Wood standard	
		coordinate with their	(FSC-STD-40-005	
		communities to get better	V3-1), so it is no	
		and more robust laws	longer included as	
	Does "known controversial activities" mean activities where laws have been violated laws and offenders have	established to solve any	a required element	
	been convicted or areas where laws has been violated systemically without retribution for the victims?	systemic unresolved	of the second draft	_
3.1 DDS req. (Clarification of this term is essential so participants know why a region is deemed controversial.	problems.	of the NRA.	Economic
			A DDS is now	
			required as a part	
			of conforming to	
			the Controlled	
			Wood standard	
			(FSC-STD-40-005	
			V3-1), so it is no	
		Allow general statement	longer included as	
		"the control measures	a required element	
		specified in the NRA will be	of the second draft	
3.2 DDS summary	Since all this will be established in the NRA, why is it necessary to restate it?	adopted"	of the NRA.	Economic
		Change wording to		
		streamline public		
		summaries so that they		
		highlight areas of risk		
		defined as specified and only	A DDS is now	
		highlight additional control	required as a part	
		measures used. Indicate that	of conforming to	
		the approved NRA control	the Controlled	
		measures will be deemed as	Wood standard	
		adequate for all companies.	(FSC-STD-40-005	
		This requirement to	V3-1), so it is no	
		publically state control	longer included as	
	If control measures are being met using the NRA framework the certificate holder should be able to highlight the	measures is unnecessary if	a required element	
	risk areas that are specified within their assessment and that they are using the NRA control measure. If	all companies will be stating	of the second draft	
3.2 DDS summary	alternative control measures are used this is the ONLY situation where a brief description should be necessary.	exactly the same thing.	of the NRA.	Economic
		This only needs to be a	A DDS is now	
		general description of the	required as a part	
		control measures.	of conforming to	
		Descriptions of HCVs and	the Controlled	
		control measures shall be	Wood standard	
		sufficiently detailed to	(FSC-STD-40-005	
		demonstrate compliance	V3-1), so it is no	
1		with this section, but can be	longer included as	
,	NOTE: Change should to shall. To ensure Certificate Holders (CH) are providing adequate descriptions of HCVs	generalized where necessary	a required element	
	NOTE: Change should to shall. To ensure Certificate Holders (CH) are providing adequate descriptions of HCVs and control measures in their public summary and to ensure all Certification Bodies (CB) audit the CH to the	generalized where necessary	a required element of the second draft	
		-	•	Economic
	and control measures in their public summary and to ensure all Certification Bodies (CB) audit the CH to the	generalized where necessary to protect sensitive or	of the second draft of the NRA.	Economic
3.2 DDS summary	and control measures in their public summary and to ensure all Certification Bodies (CB) audit the CH to the same level of conformance, FSC_US should develop supplementary guidance for this requirement.	generalized where necessary to protect sensitive or proprietary information.	of the second draft	Economic
3.2 DDS summary	and control measures in their public summary and to ensure all Certification Bodies (CB) audit the CH to the	generalized where necessary to protect sensitive or	of the second draft of the NRA. A DDS is now	Economic

				1
	could be considered proprietary as it may be a discussion of how a company can meet such requirements more		Wood standard	
	efficiently than a competitor and therefore such information should not be publically available.		(FSC-STD-40-005	
			V3-1), so it is no	
			longer included as	
			a required element	
			of the second draft	
			of the NRA.	
			A DDS is now	
			required as a part	
			of conforming to	
			the Controlled	
			Wood standard	
			(FSC-STD-40-005	
		Don't do constant de l'Ocention	V3-1), so it is no	
		Provide greater clarification	longer included as	
	There is a reference to Section 4 of FSC-STD-40-005 and associated international due diligence system elements,	as to what document is	a required element	
	but the version of FSC-STD-40-005 available from the FSC web site (https://ic.fsc.org/standards.340.htm) does	being referenced as "FSC-	of the second draft	
3.3 CW STD ref	not include a Section 4 with this content.	STD-40-005."	of the NRA.	Economic
			The second draft of	
			the NRA contains	
			risk assessments	
			for all five	
		This assessment should	controlled wood	
	Category 1 and Category 2: FSC inappropriately delegates responsibility for assessing risk associated with	come back to FSC US	categories and has	
	Traditional and Civil Rights and Legality to the Centralized Risk Assessment to be conducted by FSC International.	working groups to be	designated Low	
	Since this work has yet to be completed it is not possible for certificate holders to adequately assess impacts and	addressed with US	Risk for Categories	
3.4 DDS elements	provide comments.	certificate holder input.	1 and 2.	Economic
	p		The second draft of	
			the NRA contains	
			risk assessments	
			for all five	
			controlled wood	
			categories and has	
	2.4.4 Locally 1999 US the Iddhes and Locally 1999		designated Low	
	3.4.1 Legality :FSC-US should have a say on this.		Risk for Categories	
3.4 DDS elements	3.4.2 Traditional and Civil Rights: FSC US should have a say on this		1 and 2.	Economic
			The second draft of	
	FSC US has apparently delegated responsibility for assessing risk associated with Traditional and Civil Rights to a		the NRA contains	
	Centralized Risk Assessment, to be conducted by FSC International, without any effective review and comment		risk assessments	
	by affected parties and certificate holders in the U.S.		for all five	
			controlled wood	
	FSC US includes a vague requirement to implement "a system designed to avoid" inputs from illegal harvests and		categories and has	
	where traditional or civil right are being violated. Given that FSC US has identified both categories as Low Risk, it		designated Low	
3.4 DDS elements	is not clear what system elements would be appropriate or required.		Risk for Category 2.	Economic
			A DDS is now	
			required as a part	
			of conforming to	
			the Controlled	
		Provide more information	Wood standard	
	We are concerned about the lack of detail provided as to what "a system" might need to encompass to achieve	regarding the potential or	(FSC-STD-40-005	
	the expectations of this requirement and the potential burden that this requirement could potentially place on	required components of "a	V3-1), so it is no	
	our customers. However, without the ability to review the international due diligence system elements	system" that will achieve	longer included as	
3.4 DDS elements	referenced in 3.3, it is difficult to assess what the additional elements in 3.4 would entail.	this section of the standard.	a required element	Economic
3.4 DD3 elements	Terefericeu iii 5.5, it is ufficult to assess what the auditional elements in 3.4 would entail.	uns section of the standard.	a required element	Economic

1		T T	-Cili	
			of the second draft	
			of the NRA.	
	FSC US has apparently delegated responsibility for assessing risk associated with Traditional and Civil Rights to a			
	Centralized Risk Assessment, to be conducted by FSC International, without any effective review and comment		The second draft of	
	by affected parties and certificate holders in the U.S.		the NRA contains	
			risk assessments	
	FSC US includes a vague requirement to implement "a system designed to avoid" inputs from illegal harvests and		for all five	
	where traditional or civil right are being violated. Given that FSC US has identified both categories as Low Risk, it		controlled wood	
3.4 DDS elements	is not clear what system elements would be appropriate or required.		categories.	Economic
3.4.2 Question for			The second draft of	
Consultation			the NRA contains	
Category 2			risk assessments	
(Traditional &		Adequate time was not	for all five	
Civil rights)		provided to include	controlled wood	
comments based	Analysis and conclusions for designating risk for Category 2 has inappropriately been delegated to an undefined	comments on the draft	categories and has	
on most current	Centralized National Risk Assessment with no provision for stakeholder review or comment. This approach is	CNRA documents by the	designated Low	
understanding	unacceptable and not an open, transparent and inclusive process.	March 13 deadline.	Risk for Category 2.	Economic
3.4.2 Question for	, p	-	The second draft of	-
Consultation			the NRA contains	
Category 2			risk assessments	
(Traditional &			for all five	
Civil rights)			controlled wood	
comments based			categories and has	
on most current	RE: CNRA Category 2: Since this came out so recently, I have not had time to review findings related to the		designated Low	
understanding	National Risk Assessment – can't really comment on this at this point.	No change.	Risk for Category 2.	Economic
3.4.2 Question for	National Nisk Assessment Can Creatly Comment on this at this point.	No change.	The second draft of	LCOHOITIC
Consultation			the NRA contains	
			risk assessments	
Category 2 (Traditional &			for all five	
,				
Civil rights)			controlled wood	
comments based	Construction that the construction of a second with the CCC CND for the UC or Coherence 2. Construction with		categories and has	
on most current	Cursory review shows many areas of concerns with the FSC CNR for the US on Category 2. Suggest waiting until		designated Low	F
understanding	next draft comes out as we can expect much stakeholder feedback to FSC regarding their risk designations	NA	Risk for Category 2.	Economic
3.4.2 Question for			The second draft of	
Consultation			the NRA contains	
Category 2	The continued inclusion of the ILO conventions must be resolved by FSC International in all FSC standards. In the		risk assessments	
(Traditional &	Draft United States CNRA currently out for public consultation, FSC continues to include requirements related to		for all five	
Civil rights)	compliance the ILO core conventions, which are incompatible with national law in a number of countries,		controlled wood	
comments based	including the United States. Certificate holders and their suppliers cannot fully comply with ILO core conventions		categories and has	
on most current	in countries where the conventions have not been ratified. National and local laws in the United States		designated Low	
understanding	supercede any ILO requirements.		Risk for Category 2.	Economic
3.4.2 Question for			The second draft of	
Consultation			the NRA contains	
Category 2			risk assessments	
(Traditional &			for all five	
Civil rights)			controlled wood	
comments based			categories and has	
on most current	Firms in the business of buying and processing forest products generally do not have the specialized knowledge		designated Low	
understanding	or the resources to develop programs focused on civil or traditional rights.		Risk for Category 2.	Economic
3.4.2 Question for			The second draft of	
Consultation			the NRA contains	
				1
			risk assessments	
Category 2 (Traditional &	Wood procurement organizations in the business of buying and processing forest products generally do not have		risk assessments for all five	

comments based			categories and has	
on most current			designated Low	
			_	
understanding			Risk for Category 2.	
		FSCUS should align their		
		comments and stance on ILO		
		issues to back the		
		government and laws in the		
		country where they are		
		based. A process to outline		
		a clear path forward should		
		be determined by the		
		CWWG and stated to		
		certificate holders so that		
		clarity is added to the		
3.4.2 Question for		system instead of additional	The second draft of	
Consultation		burden. If FSCUS cannot	the NRA contains	
Category 2		define a clear path forward,	risk assessments	
(Traditional &		all items regarding ILO	for all five	
Civil rights)	There is currently a CNRA open for draft consultation. Category 2 within the CNRA indicator 2.2 and 2.3 call for	should not be incorporated	controlled wood	
comments based	specified risk due to ILO issues within the US. There is an ILO working group that has been meeting to come to	into the document until the	categories and has	
on most current	solutions for the US that work for certificate holders. Until this working group can come to a conclusion the	ILO working group has	designated Low	
understanding	CNRA for the US should not be finalized.	concluded.	Risk for Category 2.	Economic
		Instead of mating ILO		
3.4.2 Question for	The US has only ratified two of the eight ILO Convention s. By agreeing to uphold the ILO FPRW, the document	conventions into FSC	The second draft of	
Consultation	itself says that even if a country has not ratified the conventions, it is agreeing to uphold them anyway. ILO	standards, FSC simply needs	the NRA contains	
Category 2	FPRW also references/incorporates the ILO Philadelphia Declaration, which in turn references/incorporates the	to list a performance	risk assessments	
(Traditional &	ILO Social Justice Declaration. This is one of the problems with referencing external sources; you do not know	indicator. For example,	for all five	
Civil rights)	"how far the rabbit hole goes" when standards reference other standards.	"Organization complies with	controlled wood	
comments based		US Child Labor Laws,"	categories and has	
on most current	Once again, this references an ILO convention that the US has not ratified. Neither Columbia, nor other US	instead of pointing to ILO	designated Low	
understanding	business can comply with this indicator without violating Principle 1 of the FSC Principles and Criteria.	conventions.	Risk for Category 2.	Economic
			The second draft of	
			the NRA contains	
			risk assessments	
			for all five	
3.4.2 Question for			controlled wood	
Consultation			categories and has	
Category 2	MWV requests that the second comment period for the draft NRA be at least 60 days to allow for a thorough		designated Low	
(Traditional &	analysis of both the draft Centralized NRA (CNRA) and the anticipated second draft of the FSC-US NRA.		Risk for Categories	
Civil rights)	Certificate holders and members need sufficient time to adequately review Risk Category 1, 2, and 5 of the		1, 2 and 5. The	
comments based	CNRA, which will be part of the comprehensive NRA that eventually will be finalized. In addition, conclusions		second public	
on most current	reached in the CNRA, such as Risk Category 2 – Traditional & Civil Rights assessments will require revision by FSC-		consultation will be	
understanding	US, limiting the effectiveness of comments by stakeholders.		60 days.	Economic
3.4.2 Question for			The second draft of	
Consultation			the NRA contains	
Category 2			risk assessments	
(Traditional &		This assessment should	for all five	
Civil rights)	Category 1 and Category 2: FSC inappropriately delegates responsibility for assessing risk associated with	come back to FSC US	controlled wood	
comments based	Traditional and Civil Rights and Legality to the Centralized Risk Assessment to be conducted by FSC International.	working groups to be	categories and has	
on most current	Since this work has yet to be completed, it is not possible for certificate holders to adequately assess impacts	addressed with US	designated Low	
understanding	and provide comments.	certificate holder input.	Risk for Category 2.	Economic
3.4.2 Question for			The second draft of	
Consultation	Wood procurement organizations in the business of buying and processing forest products generally do not have		the NRA contains	
Category 2	the specialized knowledge or the resources to develop programs focused on civil or traditional rights.		risk assessments	Economic

(Traditional &			for all five	
,				
Civil rights)			controlled wood	
comments based			categories and has	
on most current			designated Low	
understanding			Risk for Category 2.	
3.4.2 Question for			The second draft of	
Consultation			the NRA contains	
Category 2			risk assessments	
(Traditional &			for all five	
Civil rights)			controlled wood	
comments based		Prefer the term	categories and has	
on most current	If specified risk is designated it is appropriate that control measures will be implemented in areas where rights	"systemically violated"	designated Low	
understanding	are being violated.	instead of just "violated."	Risk for Category 2.	Economic
			The methodology	
			for identifying	
			individual species	
			changed from	
			expert opinion to	
			the more	
			systematic	
			approach that uses	
			the NatureServe	
			database and	
			assessing the	
			threats to each	
			species from forest	
			management	
			activities. The	
			resulting list of	
			species is quite	
		1) where they are known to	different than that	
		occur – what exactly does	included in the first	
		this mean – anytime	draft. The scale of	
		presence is detected?	risk designations	
		Where range indicates they	has also been	
		may exist? Perhaps there is a	revised to assist	
		better way to state this?	certificate holders	
		2) Priority listing is a very	in deciding	
		small subset of T and E	whether or not	
	"The HOVe to be addressed include federally as state deal of the state	species in the U.S. and	they areas of	
	"The HCVs to be addressed include federally or state designated Endangered or Threatened species where they	appears to be cherry-picked	specified risk are	
2.4.2.1107.2.2.2	are known to occur". Yet the priority listing (3.2.1.3 of HCV 1 assessment) includes only a very small subset of	specific to pacific coast.	within their supply	F
3.4.3 HCV DDS	endangered or threatened species in the U.S.	More on this later.	areas.	Economic
		Again suggest expanding the		
		statement by including		
		language stating that if an		
		organization purchases	This requirement	
		material from a	has been removed	
		controversial source that	from the second	
		that material will be	draft of the NRA	
		segregated and processed as	and is addressed in	
		un-controlled and not	the DDS section of	
	Again an organization may have to purchase wood from a controversial source in order to run and just produce	included with or sold as a	the approved FSC-	
3.4.3 HCV DDS	an un-controlled product that is not included with or sold as a mixed credit product.	mixed credit product.	STD-40-005 v3.	Economic

			1	
		Category 3 – High		
		Conservation Values: The		
		organization shall implement		
		a system designed to avoid,		
		including through language		
		in the Controlled Wood	This requirement	
		Policy, material from sources	has been removed	
		where it is known that	from the second	
		federal or state endangered	draft of the NRA	
		species currently occupy the	and is addressed in	
		site, and are threatened by	the DDS section of	
	There is an opportunity to clarify language such that the avoidance of material from sources that impact HCV's,	forest management	the approved FSC-	
3.4.3 HCV DDS	actually means avoidance of material that adversely impacts T&E species that currently populate the site.	activities.	STD-40-005 v3.	Economic
31.113.113.133	actions of the state of the sta	detirities.	FSC has clearly	20011011110
			articulated that the	
			consideration of	
			risk of materials	
			from areas of	
			conversion is	
			required, even if	
			the conversion is	
			not due to forest	
			management	
			activities.	
			The second draft of	
			the NRA directs	
			users to the FSC US	
			Plantation	
			guidance for	
			assistance.	
			Additional	
	Conversion of natural or semi-natural forest to plantations: Land conversion decisions are not driven by wood		clarification has	
	values. FSC US offers no evidence that excluding wood from FSC Chain of Custody certified mills will bring any		been included to	
	benefits in terms of reduced land use conversion. The National Risk Assessment also does not evaluate the	Plantation Note: The	further explain that	
	tradeoffs of alternative disposal and non-use of wood material as associated environmental impacts.	plantation definitions need	just because a	
		to be simplified so it can be	stand is planted, it	
	Platation Note: This draft redefines and expands "Forest Plantations" from the definition contained in the FSC	effectively communication	is not necessarily a	
	US National Forest Management Standard. Thus, the Controlled Wood Standard has become more stringent	to suppliers.	plantation.	
	than the Standard intended for landowners that volunteer to implement the FSC Forest Management Standard.			
		Conversion of natural or	The de minimus	
	Conversion of natural or semi-natural to plantations: The arbitrary limits of 20 acres or less for plantations is	semi-natural to plantations:	size for conversion	
3.4.4 Conversion	unrealistic and not based on the reality of forestry in the US context. There is not stated rationale or basis for	Provide a more realistic size	has been changed	
DDS	such a small acreage size limitation.	limitation. Suggest 60 acres.	to 100 acres.	Economic
			Supplier	
			agreements are no	
	Given the conversion exceptions in 3.4.4.1 and 3.4.4.2, it seems unnecessary to require supplier agreements to	Eliminate the supplier	longer required in	
3.4.4 Conversion	avoid sourcing from an area that has already been designated "low risk". The exceptions in 3.4.4.1 and 3.4.4.2	agreements requirement for	the second draft of	
DDS	are reasonable.	category 4	the NRA.	Economic
	Should state that there are exemptions to sourcing wood from conversions in the higher-level requirement	Please clarify in the higher	FSC has clearly	
	which states explicitly, "The organization shall implement a system designed to avoid,, material from land	level statement about	articulated that the	
	where natural forest cover is being converted to non-forest uses or plantations." How am I supposed to put in	organization putting into	consideration of	
	place a system that explicitly talks about how I will avoid sourcing wood from conversions when I likely will be	place a system designed to	risk of materials	
3.4.4 Conversion	sourcing wood from small conversions < 40 acres? This places the Organization in a very awkward position.	avoid conversion some	from areas of	
DDS	,	language that makes it clear	conversion is	Economic
		oudpo that makes it cical	-5	

_				,
	Exotic Species: "Cultivation of exotic species or recognized exotic sub-species"	that there are exemptions	required, even if	
		(maybe something like,	the conversion is	
	"Block plantings of cloned trees resulting in a major reduction of within-stand genetic diversity compared to	"aside from allowances	not due to forest	
	what would be found in a natural stand of the same species." Throughout this document subjective words like	stated below.")	management	
	"major reduction" should be removed and replaced with more specific language. Much like every other FSC		activities.	
	document – this NRA needs to be specific and auditable. Please replace "major reduction" with a more specific	Exotic Species: Need		
	term – i.e. reduction of over 50% of the stand's genetic diversity, 25% whatever number is appropriate. I really	definition of exotic species	The second draft of	
	don't have a good handle for what would be considered a "major reduction in genetic diversity."	added to the glossary. Many	the NRA directs	
		arguments about what an	users to the FSC US	
		exotic species actually is	Plantation	
			guidance for	
		Please replace "major	assistance.	
		reduction" with a more	Additional	
		specific term – i.e. reduction	clarification has	
		of over 50% of the stand's	been included to	
		genetic diversity, 25%	further explain that	
		whatever number is	just because a	
		appropriate. I really don't	stand is planted, it	
		have a good handle for what	is not necessarily a	
		would be considered a	plantation.	
		"major reduction in genetic	•	
		diversity."		
		,	FSC has clearly	
			articulated that the	
	Disagree with requirements that some conversion sources are not allowed as controlled wood fiber input. Land		consideration of	
	use decisions are made by private corporate and family forest landowners in the United States based upon		risk of materials	
	economic returns, long-term management planning, and landowner objectives for property they own. Imposing		from areas of	
	vague and arbitrary land use controls such as acreage size restrictions for legal land conversions, may cause		conversion is	
	conversion wood fiber not to be utilized when harvested during land use change and left behind as waste versus		required, even if	
	being utilized withing the circular economy. Certified organizations will have to procure alternative fiber to		the conversion is	
	replace wasted conversion sources, creating the necessity to harvest other forests. Certain land coversions (such		not due to forest	
3.4.4 Conversion	as mining) will occur regardless of requirements to exlude it as controlled wood source. Conversion sources		management	
DDS	should be allowed as controlled wood input		activities.	Economic
	·		The second draft of	
			the NRA contains	
			control measures	
			where the exact	
			mitigation actions	
			will be determined	
			during a	
			collaborative	
			dialogue at a	
	It is not clear how the monitoring and evaluation component for 3.4.4.1 and 3.4.4.2 would be completed by		regional meeting.	
	companies attempting to meet these requirements, and it may prove to be impossible or unduly burdensome.		Therefore,	
	U.S. facilities source from hundreds to thousands of private timberland owners in a year. Landowners are under		monitoring and	
	no legal obligation to disclose the intent of their forest activities. Certificate holders easily could be put in the		evaluation are not	
3.4.4 Conversion	untenable position of having, in good faith, purchased and utilized what they believed to be low-risk material,		explicitly included	
DDS	and then, after the fact, finding out that this was not the case and being forced to take corrective action.		in the second draft.	Economic
	The inclusion of conversion is not justified for indirect purchases and by-products. It imposes an undue and			-
	unreasonable burden on companies without a scientific basis. The NRA states that conversion is low risk and it		Second draft of	
	should be treated that way. There is no credible way to verify that by-product material does not come from a		NRA removes	
	legal land conversion. The burden then seems to shift to companies to either abandon this supply source or to		diferentiation	
	test the limits of legality and dig into our supplier's supply chains. By-product supply is a critical component of		between direct and	
3.4.4 Conversion	the supply chain. Forcing a company to exclude or minimize this will cause an economic decision that cannot be		indirect suppliers	
DDS	favorable for continued FSC certification. Most of the sellers of this material can readily find another market		and no longer uses	Economic
	and the second s			

	(energy) and this requirement will have no impact to practices on the ground. For the few that can't, the loss of their market due to FSC requirements will be very damaging.		the term byproduct.	
	This is a clear example of a requirement that will make FSC certified companies less competitive trying to procure raw material and will do nothing to improve on the ground outcomes. The allowance of some types of conversion and not others speaks directly to this. The only place that conversion can credibly be excluded is in		зурговиси.	
	direct purchases. Conversion at an ecoregionally significant level or of primary HCV forest should be excluded for this supply segment. The requirements as laid out do not accomplish this.			
		Remove supplier agreement wording from this section of standard. Is it intentional from FSC IC that this wording is in all supplier agreements worldwide? I would not accept this in the US if it will not be required in Canada or everywhere else within the world at a global rate for risk	Supplier	
	Language in supplier agreements should only be required for conversion if there is specified risk. Because	assessments that highlight no specified risk being in place. This will place the US	agreements are no longer required in the second draft of	
	there is no specified risk, language in supplier agreements should not be required. If companies are monitoring their supply and have a DDS in place to avoid materials of controversy, it is unnecessary to add this contract language or require monitoring/auditing of contract language. The NRA states that risk for conversion is not specified, provided that a due diligence approach is followed. This addition in supplier agreements may infringe on anti-trust laws.	at a disadvantage compared to another country where risk of conversion is found to be low and no DDS requirements are in place.	the NRA. The second draft of the NRA directs users to the FSC US Plantation	
	This reference should exclude examples and reference FSCUS guidance which is subject to change based on the current and upcoming new FSCUSFM standard.	Reference Plantation Guidance from FSCUS only with no examples.	guidance for assistance. Additional	
	The intent of avoiding conversion is understood, but the mechanics behind avoiding and monitoring do not work in common practice. The current industry norm is to monitor tracts as they are being managed. Prior to management activity, tracts are not visited by procurement organizations. The conversion DDS implies that	Add a note below 3.4.4.2 that states the DDS intent of	clarification has been included to further explain that	
	wood is avoided. In most instances the purchaser will not know the outcome of this harvesting until after the fact. The DDS and monitoring section needs to allow for flexibility in when field verification and monitoring may	the standard and conversion as has been stated at the	just because a stand is planted, it	
3.4.4 Conversion DDS	occur. The system and risk assessment should also acknowledge the intent of mitigating but not eliminating all risk of receiving conversion material.	beginning of the DDS section III.	is not necessarily a plantation.	Economic
			FSC has clearly articulated that the consideration of risk of materials from areas of conversion is required, even if	
	Excluding wood from conversion of natural forests is a core FSC principle. It is critical that the DDS set out a clear and reasonable effort to keep this controversial fiber out of the FSC supply chain. The thresholds for forest conversion currently represent a fair compromise that provides operational room for certificate holders, while still working to limit conversion-derived wood in the FSC system. In support of the current compromise, the language for conversion for public purpose must clearly address more controversial conversion sources, including transmission lines and other private energy projects. In addition, there are concerns that the acreage		the conversion is not due to forest management activities.	
3.4.4 Conversion DDS	limits could somehow be "gamed" by parsing larger conversions into 10 or 20 acre increments (i.e., a phased development of a shopping mall outside city limits). The language should make clear that the certificate holder needs to looks at the larger parcel and project area under development when calculating exceptions.		size for conversion has been changed to 100 acres.	Environmental

				1
			A DDS is now	
			required as a part	
			of conforming to	
			the Controlled	
			Wood standard	
			(FSC-STD-40-005	
			V3-1), so it is no	
			longer included as	
			a required element	
			of the second draft	
			of the NRA. The	
			control measures	
			where the exact	
			mitigation actions	
			will be determined	
			during a	
			collaborative	
	These indicators serve a useful role, and correctly note that de minimis levels of conversion may occur. However,		dialogue at a	
	it is not clear how the monitoring and evaluation component of these programs would be completed by		regional meeting.	
	companies attempting to meet these requirements, and it may prove to be impossible or unduly burdensome.		Therefore,	
	U.S. facilities source from hundreds to thousands of private timberland owners in a year. Landowners are under		monitoring and	
	no legal obligation to disclose the intent of their forest activities. Certificate holders easily could be put in the		evaluation are not	
3.4.4 Conversion	untenable position of having, in good faith, purchased and utilized what they believed to be low-risk material,		explicitly included	
DDS	and then, after the fact, finding out that this was not the case and being forced to take corrective action.		in the second draft.	Economic
003	and then, after the fact, midnig out that this was not the case and being forced to take corrective action.	Suggest re-writing this	iii tile secolia di art.	LCOHOITIC
		exception to say. "Instances	FSC has clearly	
		of conversion of natural or	articulated that the	
		semi-natural forest to	consideration of	
		intensively established and	risk of materials	
		•		
		managed plantations in the	from areas of	
		coastal plain and lower	conversion is	
		piedmont shall be limited to	required, even if	
		50 acres or less. Plantations	the conversion is	
		established in the upper	not due to forest	
		piedmont and mountains of	management	
		the eastern and south	activities.	
		eastern US shall not be		
		considered a conversion if	The public benefit	
		bedding, fertilization and	exception has been	
		herbicides are not used in	removed.	
	The exception for a conversion of natural or semi-natural forest to plantations is not broad enough and tends to	the establishment or		
	assume that all plantations are intensively managed which may include practices such as bedding, fertilization	management of the	The second draft of	
	and herbicide use. Many plantations that are established outside of the coastal plain and lower piedmont are not	plantation."	the NRA directs	
	intensively managed at all and should not be considered a conversion. On upper piedmont and mountain		users to the FSC US	
	properties in the eastern and south eastern US most plantations are established on poor mixed hardwood and	The 40 acres exception	Plantation	
	pine sites. There is no bedding or fertilization and herbicides are not generally used. Usually natural hardwood	should be increased to a	guidance for	
	regeneration will be intermingled with the planted pines. These plantings are also widely scattered and are not	minimum of 100 acres and	assistance.	
	common practice on the landscape. The rotation age is generally also much longer than 15 to 20 years as is	this should be applied only	Additional	
	common in the intensively managed plantations of the coastal plain and lower piedmont.	to areas where there is	clarification has	
		certainty that a permanent	been included to	
	The 40 acre exception to known instances of conversion of natural or semi-natural forest to non-forest	conversion will take place.	further explain that	
	conditions seems arbitrary and too small when we know that forest loss on the overall landscape in the United	•	just because a	
	States cannot be demonstrated. There will be many instances where harvesting occurs were no evidence of	Suggest that the wording in	stand is planted, it	
3.4.4 Conversion	conversion, even when it is going to take place will be known for years. Even in coal country an area could be	this bullet be changed to	is not necessarily a	
DDS	harvested with the intent to surface mine and then if markets change the mining may never take place.	read " Instances of	plantation.	Economic
	The state of the s		p.uu	_30

		part of a public benefit development such as rights		
		part of a public benefit		
		of ways for highways, rail		
		roads, power lines, gas lines,		
		and oil lines. Conversion for		
		the construction of		
		hospitals, schools and		
		homes and all other		
		conversion projects that can		
		be deem as a short term		
		conversion such as federally		
		regulated clearing for		
		surface mining or shale oil		
		drilling".		
	The exception for instances of conversion of natural forest to non-forest conditions within the municipal			
	boundaries of an incorporated city or town should be expanded since as cities or towns grow they continuously			
	annex the property beyond their borders. It is very probable that wood from an area will be avoided because a			
	conversion takes place outside of the municipal boundary then that area will be annexed allowing wood from			
	future conversions to be used.			
	The exception for instances of conversion of natural forest to non-forest conditions as part of a public benefit			
	development such as a right-of-way, power lines, etc. could be expanded to list as many specific exceptions as			
	possible so there is no confusion of what will be allowed and what will not be allowed. During the FSC-US hosted			
	webinar on January 28th someone asked the question "if material from an area cleared for a wind farm would be			
	allowed under the public benefit exception" and the answer was that it would. Why would wood coming from a			
	wind farm site be considered non-controversial? Is it because it is considered "green energy" and is probably			
	subsidized? Are we forgetting that wind projects have been documented to kill birds by the thousands.			
	A follow up questions was then asked stating that if wood from an area cleared for a wind farm would be			
	allowed in the system would wood cleared from an area for surface mining or shale gas wells be allowed. The			
	answer to this question was no. This is difficult to understand as it could be argued that surface mining is a short			
	term conversion since federal reclamation laws now require that the ground disturbed for mining be restored as			
	close to the original landscape as possible and then re-forested. Also, over 50% of the electricity in the US is			
	generated from the burning of coal. Is low cost un-subsidised power generation not also a public benefit?There			
	is simply too much gray area here and too many exceptions. It could be argued that any road, coal mine, gas			
i e				
	well, wind farm, hospital or school is a public benefit citing the examples in the standard. Perhaps FSC should just			
	consider simplifying this and just say that conversions less than 100 acres are OK.			
	consider simplifying this and just say that conversions less than 100 acres are OK. By including the bullet that describes plantations as "Stands established through hydrological modification,	Remove the third bullet in	FSC has clearly	
	consider simplifying this and just say that conversions less than 100 acres are OK. By including the bullet that describes plantations as "Stands established through hydrological modification, including the installation of pattern ditching, that affects the water table and resulting stand hydrology", FSC US	the Note that states: "Stands	articulated that the	
	consider simplifying this and just say that conversions less than 100 acres are OK. By including the bullet that describes plantations as "Stands established through hydrological modification, including the installation of pattern ditching, that affects the water table and resulting stand hydrology", FSC US has redefined and expanded the current definition of plantations as described in the FSC US Forest Management	the Note that states: "Stands established through	articulated that the consideration of	
	consider simplifying this and just say that conversions less than 100 acres are OK. By including the bullet that describes plantations as "Stands established through hydrological modification, including the installation of pattern ditching, that affects the water table and resulting stand hydrology", FSC US	the Note that states: "Stands established through hydrological modification,	articulated that the consideration of risk of materials	
	consider simplifying this and just say that conversions less than 100 acres are OK. By including the bullet that describes plantations as "Stands established through hydrological modification, including the installation of pattern ditching, that affects the water table and resulting stand hydrology", FSC US has redefined and expanded the current definition of plantations as described in the FSC US Forest Management Standard.	the Note that states: "Stands established through hydrological modification, including the installation of	articulated that the consideration of risk of materials from areas of	
	consider simplifying this and just say that conversions less than 100 acres are OK. By including the bullet that describes plantations as "Stands established through hydrological modification, including the installation of pattern ditching, that affects the water table and resulting stand hydrology", FSC US has redefined and expanded the current definition of plantations as described in the FSC US Forest Management Standard. In the United States conversion of sites from forestland to other land use types is not driven by the sale of forest	the Note that states: "Stands established through hydrological modification, including the installation of pattern ditching, that affects	articulated that the consideration of risk of materials from areas of conversion is	
	consider simplifying this and just say that conversions less than 100 acres are OK. By including the bullet that describes plantations as "Stands established through hydrological modification, including the installation of pattern ditching, that affects the water table and resulting stand hydrology", FSC US has redefined and expanded the current definition of plantations as described in the FSC US Forest Management Standard. In the United States conversion of sites from forestland to other land use types is not driven by the sale of forest products. Economic factors related to landowner preference determine land use decisions. By restricting the	the Note that states: "Stands established through hydrological modification, including the installation of pattern ditching, that affects the water table and resulting	articulated that the consideration of risk of materials from areas of conversion is required, even if	
3.4.4 Conversion	consider simplifying this and just say that conversions less than 100 acres are OK. By including the bullet that describes plantations as "Stands established through hydrological modification, including the installation of pattern ditching, that affects the water table and resulting stand hydrology", FSC US has redefined and expanded the current definition of plantations as described in the FSC US Forest Management Standard. In the United States conversion of sites from forestland to other land use types is not driven by the sale of forest	the Note that states: "Stands established through hydrological modification, including the installation of pattern ditching, that affects	articulated that the consideration of risk of materials from areas of conversion is	

				
	The limit of 40 acres for conversion sites does not cover typical conversions that occur in the US (development,	change has been made to	activities. The	
	agriculture) over which forest product companies have no control. The allowance of exceptions for conversion is	satisfy a single stakeholder	second draft of the	
	intended to allow FSC certificate holders to utilize wood from sites that will continue to be cleared whether the	group, rather than in the	NRA requires a	
	industry purchases the wood or not. Recognizing that the industry has no control over these conversions, and	best interests of advancing	stakeholder to	
	that FSC certificate holders will be at a significant disadvantage re. wood purchases in basins where development	the standard.	develop	
	is occurring, FSC should increase the acreage limit to 100 acres.	Option 1 [preferred by	educational	
		MWV] Suggested wording:	materials that	
		3.4.4 Category 4 –	state they will not	
		Conversion: The	accept materials	
		Organization shall	from converted	
		implement a system	forest areas that	
		designed to avoid, including		
			are greater than	
		through language in the	100 acres.	
		Controlled Wood Policy,		
		material from land where		
		natural forest cover is being		
		converted to plantations.		
		Remove 3.4.4.2 in its		
		entirety.		
		Option 2 Suggested wording:		
		3.4.4.2 Wood from known		
		instances of conversion of		
		natural or semi-natural		
		forest to non-forest		
		conditions is avoided with		
		the following exceptions:		
		- Instances of conversion of		
		natural forest to non- forest		
		conditions of 100 acres or		
		less, OR		
		 Instances of conversion 		
		resulting directly from the		
		expansion of a FSC Chain of		
		Custody certified mill, OR		
		- Instances of conversion of		
		natural forest to non- forest		
		conditions within the		
		municipal boundaries of an		
		incorporated city or town,		
		OR		
		- Instances of conversion as		
		part of a publicly		
		participative and interactive		
		community development		
		plan, OR		
		- Instances of conversion of		
		natural forest to non-forest		
		conditions as part of a public		
		benefit development such as		
		· · · · · · · · · · · · · · · · · · ·		
		a right-of-way, power lines.	I	
		a right-of-way, power lines, etc.		
	Unworkable Definitions and Lack of Rationale to Limit Use of Wood Salvaged from Land Use Change. The draft	a right-of-way, power lines, etc.	FSC has clearly	
	Unworkable Definitions and Lack of Rationale to Limit Use of Wood Salvaged from Land Use Change. The draft NRA would black mills from buying wood salvaged from forest land converted to another land use if the area	- ' '	FSC has clearly	
2.4.4 Conversion	NRA would block mills from buying wood salvaged from forest land converted to another land use, if the area	- ' '	articulated that the	
3.4.4 Conversion		- ' '		Economic

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	transaction, or one FSC certificate. Another concern is whether the forest owner's intent will have to be		from areas of	
	documented and if so, in what manner. Documentation would be a significant intrusion in both a business		conversion is	
	transaction and property ownership. This is both unrealistic and inappropriate, especially in the absence of a		required, even if	
	compelling need: the NRA's analysis shows that conversion of forest land is not a major problem in the US. And		the conversion is	
	nothing in the NRA suggests that a boycott of salvaged wood would have any effect on the levels of land use		not due to forest	
	change, which is driven by other factors, not the value of the salvaged wood.		management	
	change, which is affect by other factors, not the value of the samaged wood.		activities. The	
			second draft of the	
			NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including specified	
			risk at a state-wide	
			scale rather than	
			the entire US.	
1			FSC has clearly	
			•	
			articulated that the	
			consideration of	
			risk of materials	
			from areas of	
			conversion is	
			required, even if	
	Conversion of natural or semi-natural forest to plantations: The NRA provides that based on two datasets and		the conversion is	
	separate analyses by FSC-US, that "forest cover in the United States is relatively stable." Therefore, it is hard to		not due to forest	
	understand why there is a need for a due diligence system for conversion designed to avoid, through both policy		management	
	and supplier agreements, material from land where natural forest cover is being converted to non-forest uses or		activities. The	
	plantations. If there is not a problem, then why would there be the requirement to perform due diligence?		second draft of the	
	With reference to the exemptions, these are too small (e.g. 20 acres and 40 acres) to even be able to identify in a		NRA includes a	
	· · · · · · · · · · · · · · · · · · ·			
	large supply systemit is the equivalent of tracking to an acre. The conversion issues should also be		much greater level	
	recognized as one that is driven more by economics of a forest owner if there is too much regulation and it is		of documentation	
	too costly to maintain land in a working forest status, the landowner will have the obligation to consider other		and rationale	
	economic capabilities of agriculture or possibly development. We should be doing all we can to help the		provided for the	
	economics of keeping working forests as working forests rather than making it too difficult to provide markets		risk designations,	
	for the landowner's wood products.		including specified	
			risk at a state-wide	
3.4.4 Conversion	The NRA should evaluate the tradeoffs of alternative disposal and non-use of wood material as associated		scale rather than	
DDS	environmental impacts.	Delete requirement.	the entire US.	Economic
		·	FSC has clearly	
			articulated that the	
			consideration of	
			risk of materials	
			from areas of	
			conversion is	
			required, even if	
			the conversion is	
			not due to forest	
			management	
	FSC US proposes limits to land use changes that are inconsistent with the reality of forestry and land use change,		activities. The	
	particularly in the Southern U.S. Land use decisions are made by private landowners and individuals based upon		second draft of the	
	economic returns and personal preference. FSC now seeks to impose its own set of land use planning controls		NRA includes a	
3.4.4 Conversion	that are vague and arbitrary. The NRA would effectively cause landowners to conclude that forestry is not a		much greater level	
DDS	good investment and result in the forest conversions that FSC US seeks to avoid.		of documentation	Economic
נטט	ביטט ווועפגנווופווג מווע ופגעוג ווו גוופ וטופגג גטוועפוגוטווג גוומג דאכ טא צפעל גט מעטוע.		or documentation	LCOHOITIC

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			and rationale	
			provided for the	
			risk designations,	
			including specified	
			risk at a state-wide	
			scale rather than	
			the entire US.	
		Reconsider or clarify the		
		definition of "municipal		
		· ·	This as a diameter	
		boundaries of an	This requirement	
		independent city or town"	has been removed	
3.4.4 Conversion	Does forest harvested from within designated metro areas or from unified city/county governments count as	when considering unified	from the second	
DDS	from within "municipal boundaries of an incorporated city or town? "	governments.	draft of the NRA.	Economic
		FSC US should monitor USDA		
		Aphis communications and		
		determine if and when GMO		
		"avoidance systems" are	The CNRA for	
		necessary in the US. GMOs	Category 5 has	
		are closely regulated and	been incorporated	
		permitted, and not likely to	into the NRA and is	
	Since GMOs are not currently an issue in the US, "implementing a system" should be delayed until GMOs	be widely introduced in the		
3.4.5 GMOs	, , , , , , , , , , , , , , , , , , , ,	•	designated as Low	Faanami-
3.4.5 GIVIUS	become a concern in the US.	near future.	Risk.	Economic
		I suggest a better use of FSC-		
		US time, and companies		
		time is to set up an e-library		
		with verifiable reports of		
		potential controversial		
		sources with FSC-US		
		investigations and outcomes		
		and peer-reviewed scientific		
		reports. If there is a desire to		
		include a stakeholder		
		component – then let the		
		FSC-US office be the filter for		
		verifiable reports of		
		stakeholder concerns (which		
		I expect there are some)		
		versus making a business		
		wade through a portal of		
	Stakeholder portal. I have major concerns here. So many potential problems with a stakeholder portal – how will	everyone's comments and		
	this be managed? How will stakeholders be registered? Who will monitor? If FSC-US really wants to pursue this	concerns – as presented, the		
	stakeholder concern type thing – it would be better if stakeholders directed concerns to FSC-US who would then	portal could be a never-		
	investigate, make a determination, and THEN place it on a portal. Too much noise in stakeholder concerns to	ending exercise. Would		
	separate real concerns versus folks who simply don't like timber harvest, or have other bones to pick with	prefer to find a way to	The Stakeholder	
	specific businesses.	collate and utilize	Portal has been	
	specific publicases.			
2.4.6.64-1-1-1-1	16 FEG. US/Ab - CANNO invites and the attacked languaged about 550 US about 14 and 14	meaningful information that	removed from the	
3.4.6 Stakeholder	If FSC-US/the CWWG insists on the stakeholder portal, than FSC-US should maintain some level of oversight on	will help all companies	second draft of the	
Portal	the portal.	comply with the standard.	NRA.	Economic
		"Controversial instances		
		noted in the controlled		
		wood stakeholder portal		
		shall be evaluated, initially		
		by FSC-US for accuracy and		
		applicability, if FSC-US		
	<u>l</u>	applicability, it i 30-03		

		haliana than an an ha an		
		believes there may be an		
		issue, the complaint shall be		
		evaluated by the		
		Organization for accuracy		
		and applicability"		
		As it is yet to be developed,		
		suggest instead maybe a set		
		of evaluation criteria for		
		certificate holders and		
		stakeholders to evaluate		
		instances of controversial		
		sources and have this		
		monitored by CBs rather		
		than FSC developing this		
		portal. This way,		
		stakeholders will understand		
		the expectations of data		
		needed for a credible		
		instance of controversial		
		sources, and companies will		
		also have a way to evaluate		
		the applicability of a	The Stakeholder	
		stakeholder concern. The	Portal has been	
	The idea of a Stakeholder Portal seems ok in theory. However it needs strict monitoring and minimum criterial	CB can validate if both	removed from the	
3.4.6 Stakeholder	for what can be posted. Otherwise it would likely turn into a forum for anti-industry representatives to attempt	parties have acted	second draft of the	
Portal	to discredit certified companies or derail certification processes.	accordingly	NRA.	Economic
	Stakeholder portal. Numerous indicators apparently rely on a "stakeholder portal" which doesn't currently exist,	5,		
	but is defined as "a database maintained by FSC-US that contains known specific stakeholder concerns as they			
	may relate to the CW categories of risk." Such a system of engaging stakeholders can be easily abused to impede		The Stakeholder	
	business transactions. In addition, it is not clear how suppliers or CoC holders will have to investigate or respond		Portal has been	
	to the list of stakeholder "concerns". Stakeholder outreach should be the responsibility of the CoC holder and be		removed from the	
3.4.6 Stakeholder	conducted at a scale that is appropriate for their operation. Providing the activist community a portal to disrupt		second draft of the	
Portal	forestry in the United States is not something we think FSC should enable.		NRA.	Economic
	The management of a stakeholder portal will require significant resources to screen for valid concerns. We		The Stakeholder	
	would like to further understand how FSC will manage and staff to determine valid concerns from any public		Portal has been	
	stakeholder with unsubstantiated claims. The value of the propostion is not clear. Currently complaints are		removed from the	
3.4.6 Stakeholder	handled by certificate holder, certification bodies and FSC. There is no explanation on how a certificate holder		second draft of the	
Portal	would respond to stakeholder comments on the stakeholder portal.		NRA.	Economic
	This is fundamentally a reasonable proposal for capturing and meeting stakeholder input requirements.			
	However, it is something that FSC-US must commit resources to being the operator of and the initial assessor of		The Stakeholder	
	input. It should not be expected that individual certificate holders be required to read and evaluate every		Portal has been	
	comment that is submitted, as this could easily get out of hand. FSC-US should review & filter all input to be sure		removed from the	
3.4.6 Stakeholder	that i) only legitimate & significant issues are identified for further action and ii) required actions are consistently		second draft of the	
Portal	applied among all certificate holders that may be impacted.		NRA.	Economic
	Stakeholder portal. All postings to the stakeholder portal must be fully vetted for accuracy by FSC prior to being			
	considered by a company. The potential for frivolous, biased, and unsubstantiated claims here is immense.		The Stakeholder	
	Companies cannot reasonably be expected to address CW in this manner. It allows an ENGO or non-cooperative		Portal has been	
	industry the opportunity to basically rewrite the NRA to their liking. The CW draft standard only allowed for		removed from the	
3.4.6 Stakeholder	revision every three years while this allows for revision on the fly. This has the potential to cripple the system.		second draft of the	
Portal	There is no review frequency requirement and without that there is little point in having it.		NRA.	Economic
	Incorporating voices from civil society into its processes is a core FSC value. And it remains critical to include this		The Stakeholder	,
	perspective in the CW system. The proposed "stakeholder portal" is a critical component of the system and		Portal has also	
3.4.6 Stakeholder	would serve the key FSC value of incorporating environmental, social and economic stakeholders into the		been removed	
Portal	system. In areas not explicitly identified as having "risk" in the NRA it is important to recognize that FSC forest		from the second	Environmental
i Oi tai	335cm. In a cas not explicitly identified as having 113K. In the MINA it is important to recognize that 150 follost		Hom the second	LITVITOTITITETILAT

	values can still be negatively impacted by forest management and in many cases forest activists and others have already flagged where there are problems with HCVs, conversion, legal violations, etc The stakeholder portal can effectively host that critical on-the-ground information to be considered by the certificate holder as they run their DDS. In addition, the burden on the certificate holder would be minimal as most likely there would be only limited material on the site and would be focused only on the most controversial sources that the FSC is working to address. In the absence of the Stakeholder Portal,, it would be critical to incorporate such concerns into the NRA - which would undoubtedly require an expansion to the areas of specified risk.		draft, though there are still avenues for stakeholders to relay any concerns they have related to the Controlled Wood categories of risk through regional meetings, the dispute resolution process, or direct communication with FSC US.	
3.4.6 Stakeholder Portal	Stakeholder Portal (3.4.6) The creation and use of a stakeholder portal as described in the NRA is a very loose concept, with little guidance for companies that would be required to utilize this tool. We are concerned that a stakeholder portal easily could be abused by stakeholders with more interest in stopping all harvest (even harvest on FSC-certified lands) than in sustainable forest management. There is also little information on how companies would respond to concerns or incorporate them into the CW-DDS. If a stakeholder portal is hosted by FSC-US, it must be well-defined and the design made available for comment. Further, if FSC-US is hosting this service, there must be appropriate staff resources devoted to managing the database to ensure the information contained within is accurate, understandable, and not duplicative. Without proper management, a stakeholder portal may quickly descend to a level akin to the comment section of an online newspaper, becoming a morass that is impossible for companies to effectively review and incorporate into the CW-DDS.	If a stakeholder portal is hosted by FSC-US, it must be well-defined and the design made available for comment. Further, if FSC-US is hosting this service, there must be appropriate staff resources devoted to managing the database to ensure the information contained within is accurate, understandable, and not duplicative. Without proper management, a stakeholder portal may quickly descend to a level akin to the comment section of an online newspaper, becoming a morass that is impossible for companies to effectively review and incorporate into the CW-DDS.	The Stakeholder Portal has been removed from the second draft of the NRA.	Economic
	The FSC US Controlled Wood Stakeholder Portal is not yet available to review by CBs and CHs; which makes commenting on it difficult.	The FSC_US CW Stakeholder portal should be available to review for the next round of CW NRA consultation.		
	Will the Company be automatically notified if stakeholder concerns and reports of controversial activities with the supply area impact them?	If a mechanism to automatically notify the		
	How often does the Company have to consult the stakeholder portal to be in conformance with this requirement? The Stakeholder Portal should automatically notify the Company if their supply area is part of a stakeholder concern and report.	Company is not developed, then consulting the stakeholder portal quarterly seems sufficient to ensure		
	Will FSC_US review and evaluate the stakeholder concerns and reports to ensure the concerns/reports are valid prior the Organizations evaluation? This would make the process more efficient for cert holders and certification bodies.	the requirement does not become burdensome to the certificate holder. FSC-US will evaluate the validity of the stakeholder	The Stakeholder Portal has been	
3.4.6 Stakeholder Portal	A required response time for the Organization to conduct their evaluation of stakeholder concerns/reports should be established for this requirement. To ensure concerns/reports are evaluated within a timely manner and ensure controversial sources are not part of the supply area.	concerns and reports prior to the concerns and reports being posted in the FSC-US	removed from the second draft of the NRA.	Economic

			T	
		Controlled Wood		
	Documenting the evaluation and maintaining records of evaluation will make the requirement more auditable.	Stakeholder Portal. All valid		
		stakeholder concerns and		
		reports will be posted on the		
		portal and the Organizations		
		impacted will be notified so		
		they may conduct their		
		evaluation.		
		The Organization shall		
		evaluate stakeholder		
		concerns and reports within		
		5-10 business days to ensure		
		controversial sources are not		
		part of the supply area. The		
		Organization shall notify		
		their Certification Body with		
		the results of their		
		stakeholder concern and		
		report evaluation.		
		The Organization's		
		evaluation of stakeholder		
		concerns shall be		
		documented, maintained for		
		at least 5 years, and		
		available for auditor review		
		during annual evaluations.		
		Suggest making it very clear		
		in this statement that an		
	It is not clear how a company should address stakeholder conserve that are nosted on the ESC US Controlled	organization is not required		
	It is not clear how a company should address stakeholder concerns that are posted on the FSC US Controlled			
	Wood Stakeholder Portal. It is one thing to require companies to consult this portal for stakeholder concerns but	to evaluate for accuracy and		
	quite another to require companies to take action on these concerns. Most organizations will not have the time	applicability stake holder		
	or skills to evaluate these concerns for accuracy and applicability and if they were to do so would have to hire	concerns that are posted to	The Stakeholder	
	experts to carry out these evaluations. These concerns may be frivolous and non-scientific in nature and	this portal. This portal	Portal has been	
	organizations should not be required to evaluate or respond to them in any way. In fact, some stakeholders may	should be used by the	removed from the	
3.4.6 Stakeholder	use this portal to harass and otherwise attempt to prevent an organization from using wood sourced from	organization for information	second draft of the	
Portal	certain areas.	purposes only.	NRA.	Economic
· Ortal		parposes orny.	TATIVA.	LCOHOING
	The creation of a stakeholder portal as described will increase certificate holder costs and could easily			
	degenerate into a situation where stakeholders hijack the process in an attempt to prevent harvests on land that			
	they do not believe should be cut. This could occur with both non-certified and certified land. Controlled Wood			
	certificate holders are already required to have a procedure in place to receive and respond to complaints		The Stakeholder	
	related to certification (FSC-STD-40-005 Part 3 Section 14). Adding a new portal will simply increase costs and		Portal has been	
	complexity and is of questionable value. Proposed changes of this magnitude should be tested in pilot form, and		removed from the	
3.4.6 Stakeholder	evaluated with the input of both members and certificate holders before being proposed for inclusion in	Remove 3.4.6, and 3.4.6.1 in	second draft of the	
Portal	standards.	their entirety.	NRA.	Economic
· Ortal	Standards.		TATIVA.	LCOHOING
	recurs when the same of the following the same of the	Stakeholder portal should be		
	FSC US poses the question of use of a stakeholder portal as one element "in order to ensure the efficacy of the	maintained as an		
	Controlled Wood DDS." To provide this type of assurance, the third party audit review of a DDS should suffice.	opportunity for stakeholder		
	Stakeholder involvement is the responsibility of the FSC during the development of the NRA. It seems that the	input on FSC standards and		
	public comment period that FSC has extended on such a complex program including specified risk for so many	program developments. It	The Stakeholder	
	areas of the US for HCVF provides ample opportunity and time for stakeholders to comment. Any additional	should not include a	Portal has been	
	portal input as a company develops its own DDS creates uncertainty in terms of time and context, as well as	certificate holder's	removed from the	
3.4.6 Stakeholder		development of DDS or how	second draft of the	
	opportunity for opposition to anything that might occur on the ground. In addition to impacting negatively	•		
Portal	certificate holders, it also has the potential to impact private landowners who have no relationship to FSC.	a company might meet the	NRA.	Economic

		requirements of a DDS. The		
		ability to also provide		
		concerns to the Dispute		
		Resolution should be		
		maintained as noted on the		
		current stakeholder portal		
		which states "the		
		stakeholder must submit in		
		writing to the certifying		
		body any disputes." If this is		
		not continued, there could		
		be abuse and frivolous		
		accusations.		
	Portal: FSC US inappropriately proposes a "Controlled Wood Stakeholder Portal" as an online forum for "any"			
	stakeholder to post information that is potentially relevant to Controlled Wood, that certificate holders would be			
	required to consult. Any input would have to be addressed and responded to by FSC Certificate Holders as if it			
	constituted "known instances of controversial sources." Consulting such an online portal and responding to any		The Stakeholder	
	stakeholder input would impose unreasonable and inappropriate costs and burdens on wood procurement		Portal has been	
	organizations. The portal provides an opportunity for abuse by groups wishing to move forward their own		removed from the	
	agendas.		second draft of the	
3.4.6 Question for	agenuas.		NRA.	
-	Cumilian Associated FCC UC incorporated unandates that Complian Associated a settlement of		INTA.	
Consultation: DDS	Supplier Agreements: FSC US inappropriately mandates that Supplier Agreements or other control measures			
stakedholder	would "require compliance" on the part of independent suppliers and landowners. Wood procurement		Supplier	
portal, DDS	organizations are not in a position to "require" suppliers and landowners to implement Control Measures,		agreements are no	
database use, &	particularly for the vast majority of landowners that have not chosen to voluntarily participate in the FSC		longer required in	
DDS supplier	scheme. This requirement puts the fate of the FSC program in the hands of organizations whom have chosen not		the second draft of	
agreements	to participate in the FSC program.		the NRA.	Economic
		Stakeholder Portal: FSC US		
		should take an active role		
		interacting with		
		stakeholders, filtering their		
		concerns, and assisting CHs		
		in dealing with identified		
		issues.		
		133003.		
		Supplier agreements:		
		Minimize or eliminate		
		requirements for supplier		
		agreements. It is costly to		
		implement changes to		
		contracts, and requirements	The Stakeholder	
		may prove to be a	Portal has been	
		disadvantage when	removed from the	
		competing with non-FSC	second draft of the	
3.4.6 Question for		markets that do not	NRA.	
Consultation: DDS	Stakeholder Portal is preferable to potential requirement for individual CHs to engage stakeholders directly.	mandate these agreements.		
stakedholder	Portal allows stakeholders to engage, and eliminates the need for CHs to identify, engage and document		Supplier	
portal, DDS	interactions with stakeholders. Would FSC US have any role in establishing legitimacy of postings? Would	Consultation of relevant	agreements are no	
database use, &	stakeholders be required to identify themselves and provide contact information? Is FSC US in a position to	databases for T&E species:	longer required in	
DDS supplier	engage CHs to assist in addressing Stakeholders concerns? Using FSC US as an intermediary could be helpful, and	Encourage, but do not	the second draft of	
agreements	might add credibility to the process of dealing with Stakeholder concerns.	require.	the NRA.	Economic
	might and creationity to the process of dealing with stakeholder Contents.	•		LCOHOIIIC
3.4.6 Question for		Stakeholder Portal: I would	The Stakeholder	
Consultation: DDS		prefer to see FSC-US create	Portal has been	
stakedholder portal, DDS		an e-library that can collate verifiable reports of sourcing	removed from the second draft of the	Economic

database use, & DDS supplier agreements		from controversial sources as well as scientific reports that will help US companies comply with the NRA. So no – I don't think the stakeholder portal as described makes sense. Also, no the requirement to evaluate information is not fairly balanced – someone needs to filter that information before businesses are required to evaluate it (a first check to ensure it is a verifiable report.)	NRA. Supplier agreements are no longer required in the second draft of the NRA.	
		Supplier Agreements: The only problem I see with supplier agreements is that they may be very complicated – if a specified risk cuts a county in half I may have multiple agreements based on very specific areas within the supplier footprint. Could be very complex. Database search: This gets		
		to be a bit of a mess. A nice idea in concept but the problem is multiple databases with differing reports on range; occurrences; etc. Not all have the same level of QC. At some level, we have to have some trust in suppliers and in the expertise of the implementers to assure that T and E species are addressed appropriately. Also, do we just think the federal and state ESAs are BS? There appears to be little trust in how these laws are being implemented.		
3.4.6 Question for Consultation: DDS stakedholder portal, DDS database use, & DDS supplier agreements	It has been our experience that NatureServe and/or state Natural Heritage databases will not readily share site-specific element occurrence information with procurement organizations when they are not the actual landowner or land manager. As such, reliance on data that may not be available could potentially force a "survey and manage" approach to meeting the intent of the Standard.		Thank you for your comment. FSC US has provided references to available data when possible.	Economic

2.1.5.2				
3.4.6 Question for Consultation: DDS stakedholder	Certificate holders are not in the position to enforce supplier agreements with independent landowners and logging contractors who have not voluntarily chosen to participate in the FSC certification scheme. Certificate		Supplier	
portal, DDS	holders do make strong efforts to influence landowners and logging contractors to comply with laws and		agreements are no	
database use, &	regulations, implement BMPs, participate in training programs, and take other proactive measures. It is not		longer required in	
•	reasonable to expect certificate holders to require and enforce control measures on independent landowners		the second draft of	
DDS supplier	· · · · · · · · · · · · · · · · · · ·			Faanamia
agreements	and logging contractors that go beyond laws and regulations.		the NRA.	Economic
3.4.6 Question for				
Consultation: DDS	The management of the stakeholder portal will require significant resources to screen comments for validity to			
stakedholder	help avoid it from becoming cluttered with irrelevant concerns		The Stakeholder	
portal, DDS			Portal has been	
database use, &	Management of a program for "consultation of relevant databases for threatened and endangered species		removed from the	
DDS supplier	occurrences" will require significant time and resources. Who is expected to do this work? Procurement		second draft of the	
agreements	programs at our mills have limited resources from competing demands on their time.		NRA.	Economic
	The creation and use of a stakeholder portal as described in the NRA is a very loose concept, with little guidance			
	for companies that would be required to utilize this tool. We are concerned that a stakeholder portal easily			
	could be abused by stakeholders with more interest in stopping all harvest (even harvest on FSC-certified lands)			
	than in sustainable forest management. There is also little information on how companies would respond to			
	concerns or incorporate them into the CW-DDS.			
	content of meet parties are in more than the			
	If a stakeholder portal is hosted by FSC-US, it must be well-defined and the design made available for comment.			
	Further, if FSC-US is hosting this service, there must be appropriate staff resources devoted to managing the			
	database to ensure the information contained within is accurate, understandable, and not duplicative. Without			
	proper management, a stakeholder portal may quickly descend to a level akin to the comment section of an		Supplier	
3.4.6 Question for	online newspaper, becoming a morass that is impossible for companies to effectively review and incorporate		agreements are no	
Consultation: DDS			•	
stakedholder	into the CW-DDS.		longer required	
	Furthermore, management of a program for "consultation of relevant databases for threatened and		and the	
portal, DDS			Stakeholder Portal	
database use, &	endangered species occurrences" will require significant time and resources. Who is expected to do this work?		has been removed	
DDS supplier	Procurement programs at our mills have limited resources, particularly staff members not already stretched thin		from the second	
agreements	from competing demands on their time.		draft of the NRA.	Economic
		Remove Stakeholder portal		
		as a function for feedback		
		and change to a FSCUS		
		managed file of complaints,		
		and additional control		
		measures that are used to		
		assist in having a system	The Stakeholder	
	In the time that this standard has been out for DRAFT, FSC has implemented their own stakeholder portal.	where the national initiative	Portal has been	
	FSCUS should not manage any portal on their own resources.	is aware and helps with	removed from the	
		consistency of	second draft of the	
	The stakeholder portal should not be used as it is described in the NRA. The FSC 40-005 Standard draft 7.2	implementation throughout	NRA.	
	requires that any company using an additional control measure passes this information on to the national	their region.		
	initiative. The stakeholder portal would just double up on this information unnecessarily. The new 40-005		Supplier	
	standard also requires a complaints process where complaints are forwarded to a national initiative. The	Change 3.4.6: Company	agreements are no	
	national initiative can appropriately follow up with stakeholders as needed without FSCUS managing a portal and	checks national initiative	longer required in	
	database which will have an unknown added cost.	information to ensure that	the second draft of	
		their DDS is up to date on	the NRA.	
3.4.6 Question for	If databases and concerns were brought up through the FSCUS NRA process there is no reason why they should	current issues and updates		
Consultation: DDS	be additionally consulted by CH's during DDS drafting. If the DDS is a true FSC US designed DDS why would more	DDS where necessary.	CHs are not	
stakedholder	also be needed? This would be an added redundancy compared to the draft 40-005 standard.		required to	
portal, DDS		Change 3.4.6.1: This is a	complete database	
database use, &	The 40-005 standard requires that complaints are forwarded to the national initiative and that additional control	redundant indicator. There	searches in the	
DDS supplier	measures are also forwarded to the national initiative. This feedback loop will cause any new items to be on the	is no need to have two	second draft of the	
agreements	radar of FSC US. There is not a reason to add additional burden on the certificate holders in the US.	indicators present for one	NRA.	Economic
agreements	radai of 150 03. There is not a reason to add additional builden on the certificate holders in the 05.	וויטונמנטוט אופטפוונ וטו טוופ	INDA.	LCOHOHHC

		point		
		Database: Allow for the		
		complaints, control		
		measures and FSC national		
		initiative notification process		
		within the FSC-STD-40-005		
		to create this loop instead of		
		adding a redundancy to the		
		USNRA.		
			A DDS is now	
			required as a part	
			of conforming to	
			the Controlled	
			Wood standard	
			(FSC-STD-40-005	
			V3-1), so it is no	
			longer included as	
			a required element	
			of the second draft	
3.4.6 Question for			of the NRA.	
Consultation: DDS	It is critical that the DDS require consultation of the relevant databases to ascertain potential threats to T/E		CHs are not	
stakedholder	species in the certificate holders' supply area. While the data sets have their limits, the system would lose		required to	
portal, DDS	credibility if it failed to consider such critical information that is readily available. Further, without knowledge of		complete database	
database use, &	the sourcing area, it is hard to imagine effective implementation of any DDS measures. In addition, this would		searches in the	
DDS supplier	work to seamlessly complement the NRA designations which themselves are the process of compromise. Finally,		second draft of the	
	such consultation does not seem to be unduly burdensome.		NRA.	Environmental
agreements	Such consultation does not seem to be unduly burdensome.			Environmental
			The Stakeholder	
			Portal has been removed from the	
			second draft of the	
			NRA.	
			NKA.	
			Committee	
			Supplier	
			agreements are no	
	a CTANFILIAL DED DODTAL. Uplace the ECC. HE varifies the validity of stakeholder concerns and reports reject to		longer required in	
	• STAKEHOLDER PORTAL: Unless the FSC_US verifies the validity of stakeholder concerns and reports prior to		the second draft of	
2.4.6.0	them being publically available, the stakeholder portal could end up publically damaging the reputations of CW		the NRA.	
3.4.6 Question for	certificate holders, their suppliers, and their Certification Bodies. (See proposed changes in above rows regarding		Clic are n=±	
Consultation: DDS	the stakeholder portal).		CHs are not	
stakedholder	a CURRILER ACREEMENTS. The agreements should be not of the DDC		required to	
portal, DDS	SUPPLIER AGREEMENTS: The agreements should be part of the DDS.		complete database	
database use, &	- DATADACE CONCULTATION. Veg. consultation of the new contribution of the new		searches in the	
DDS supplier	• DATABASE CONSULTATION: Yes, consultation of the relevant databases for RT&E species occurrence should be		second draft of the	F:
agreements	required as part of the DDS. Databases are accessible to everyone at no cost.	Challahaldau Di did	NRA.	Economic
	Stakeholder Portal: Will organizations have to address every comment or controversy? This has the potential to	Stakeholder Portal:	The Stakeholder	
	cost tremendous time and money depending on the requirements for working with the Stakeholder Portal.	Organizations need to have	Portal has been	
2.4.6.0	Database Occasion database (dD) is deep an absorb to the base Verbiance (CD) is former. It is the	the flexibility to decide if an	removed from the	
3.4.6 Question for	Databases: Querying databases (dB) is done on a tract by tract basis. You have to fill out forms and submit tract	comment is not relevant and	second draft of the	
Consultation: DDS	boundaries on a top map. DB managers will tell you that a species occurs on site, or within a mile of the site and	should not have to research	NRA.	
stakedholder	you need to survey for the species. It takes 1 to 4 weeks to get a response back from a dB query and some states	and comment on everything		
portal, DDS	charge for this service. Where states charge for dB access it is expensive. In order to access and use information	that is posted to the	CHs are not	
database use, &	from relevant databases, it would take hundreds of man hours and would also cost thousands of dollars annually	stakeholder portal.	required to	
DDS supplier	in the states that charge for this service. Even if you try to do this at the county level, someone will have to		complete database	
agreements	verify habitat and species on the ground. This could also be problematic for rival companies who could end up in	Databases: Consulting	searches in the	Economic

a position of having to inspect each other's open market suppliers and interpret d8 search results with competitive advantages in mind. 3.4.6 Question for Consultation: DOS stakeholder portal, DOS opplier agreements A.5.0 Question for Consultation of the stakeholder portal with required as part of the Controlled Wood DOS. A stakeholder portal with required in the second draft of the NRA. 3.4.6 Question for Consultation: DOS stakeholder portal, DOS opplier agreements A.5.0 Question for Consultation: DOS supplier agreements A.5.0 Question for Consultation: DOS stakeholder portal with required as part of the Controlled Wood DOS. A stakeholder portal could easily be abused by stakeholders whose interest is solely in halling all timber harvests than in sustainable forests; B.5.0 Supplier agreements for indirect suppliers should not be required in the controlled Wood DOS. 3.4.6 Question for Consultation: DOS stakeholder portal with require significant resources to screen comments for validity to complete database use, & DOS supplier agreement of the stakeholder portal with require significant resources to screen comments for validity to complete database use, & DOS supplier agreement of the stakeholder portal with require significant resources to screen comments for validity to complete database use, & DOS supplier agreement of the stakeholder portal with require significant resources to screen comments for validity to complete database use, & DOS supplier agreement of the stakeholder portal with require significant resources to screen comments for validity to complete database use, & DOS supplier agreement of the stakeholder portal with require significant time and resources. Who is expected to do this work? Procurement programs to are units that programs are units that members are suppliered and endangered species controlled to the work of the portal members are programed for the time. 4. The stakeholder portal with the members are programmed as a post of the stakeholder portal with require significant time
3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS supplier agreements) 3.4.6 Question for Consultation: DS stakedholder portal (DS stakedholder portal (DS stakedholder portal) (DS sta
S.4.6 Guestion for Consultation: Dos Sabkeholder Portal should not be required as part of the Controlled Wood DDS. A Sakeholder portal consultation: Dos Sakeholder Portal should not be required as part of the Controlled Wood DDS. A Sakeholder portal consultation: Dos Sakeholder Portal should not be required to appare agreements Consultation of relevant databases for T&E species should only be required for direct purchases of wood. Chis are not not the controlled wood DDS. A Sakeholder portal could easily be assued by stakeholder portal could easily be assued by stakeholder portal will require significant tresources to screen comments for validity to compensive for companies to displace the meaning of the stakeholder portal will require significant tresources to screen comments for validity to companies to make poor and inspect covery tract for RTEs.
2.4.6 Question for Consultation: DDS stakedholder portal, DDS database use, & DoS supplier agreements 2.4.6 Question for Consultation: DDS stakedholder portal will required as part of the Controlled Wood DDS. A stakeholder portal consultation: DDS supplier agreements 2.4.6 Question for Consultation: DDS supplier agreements or conservation plan. Requiring this supplier agreements or the development of a management or conservation plan. Requiring this supplier agreements or the development of a management or conservation plan. Requiring this supplier agreements or the development of a management or conservation plan. Requiring this supplier agreements or the development of a management or conservation plan. Requiring this supplier agreements or the development of a management or conservation to those comparison to those stakeholder portal will require a specific this plan. Requiring this supplier agreements or the development of the stakeholder portal will require agreement agreements or indicate the plan. The management of the stakeholder portal will
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As 6 Question for Consultation DS stakedholder portal, DOS of access to the records of that database could potentially place a significant financial burden on some of our customers. Additionally, the records in this database are concentrated on lands that are already certified, already protected, or owner inventoried as part of the development of a management or conservation plan. Requiring this consultation may not result in significant additional protection of the species. Additionally, the records in this database are concentrated on lands that are already certified, already protected, or owner inventoried as part of the development of a management or conservation plan. Requiring this consultation may not result in significant additional protection of the species. Additionally, the records in this database are concentrated on lands that are already certified, already protected, or owner inventoried as part of the development or conservation plan. Requiring this consultation may not result in significant additional protection of the species. Additionally, the records in this database are concentrated on lands that are already certified, already protected, or owner inventoried as part of the development or conservation plan. Requiring this would place a significant the would place a significant this would p
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3.4.6 Question for reports be weighted - is repetition on its own (eg as a result of an orchestrated but misleading campaign) have the portal by FSC members NRA.
Consultation: DDS merit simply because of repetition? Will there be an equivalent portal for reporting good practice, or recognition and customers. Each
stakedholder of effective controls? Does FSC US discount the concerns of those without access to the portal? chamber would be weighted Supplier
portal, DDS • Company policies stating these elements is fine but placing explicit restrictions into a supplier's agreement equally to reduce the noise. agreements are no
database use, & crosses the supplier, contractor employee line. Encourage the use of the longer required in
DDS supplier • Requiring NS Data review is an effective tool to help avoid controversial sources but I know very few agreements • Requiring NS Data review is an effective tool to help avoid controversial sources but I know very few companies with the resources to pay NS \$31K a year for occurrence data much less refine it into a useful form. • Complement a participant's • The Second draft of complement a participant's • The Second draft o

	Agree with review of available information such as databases but disagree with limiting method of review in this way.	practices and help balance the feedback. Consider a process where the portal is open for a limited amount of time prior to recertification of a company to limit the administrative burden. • Keep the inclusions into supplier agreements to a minimum. Keep it practical and sensible. • Develop a more cost effective and user friendly method to review species occurrence data before considering the requirement of the burden.	CHs are not required to complete database searches in the second draft of the NRA.	
IV. Supply Area	Question why supply area needs to be categorized by input type (direct, indirect, byproduct) Supply area should be as simple and general as possible.	Define supply area as a whole, not by input type.	Second draft of NRA removes diferentiation between direct and indirect suppliers and no longer uses the term byproduct.	Economic
IV. Supply Area	The requirement does not reference the glossary. The CW NRA uses the term byproduct; FSC STD 40-005 V3.0 uses the term co-product. The Certificate Holder defines the supply area of all materials categorized by controlled wood input type (direct, indirect, and byproduct) – See Glossary for definitions of inputs. Terms within the CW NRA and FSC STD 40-005 shall be consistent. Use co-product, which is what CBs & CHs are accustomed to now. NOTE: Note: The supply area does not need to be a contiguous area. It may include multiple distinct areas and it may have areas excised from within it. Note: The Organization may excise parts of the supply area by verifying that there are no extractive activities taking place in some of these areas or that the source types of materials being extracted are different than the types of inputs purchased. These notes allow much needed flexibility for the Certificate Holder. E.g., if a RT&E has been identified in an area and it only resides in pine forests, the CH could excise the coniferous forest and access the hardwood from the deciduous forest for inclusion in their supply area.	NOTE: These notes allow much needed flexibility for the Certificate Holder. E.g., if a RT&E has been identified in an area and it only resides in pine forests, the CH could excise the coniferous forest and access the hardwood from the deciduous forest for inclusion in their supply area.	This requirement has been removed from the second draft of the NRA. A dispute resolution process is included in the second draft of the NRA as required by	Economic
V. Specified risk identification V. Specified risk	FSC states that they want complaints to first be brought up with certificate holders. Having a national initiative manage a portal will be counterproductive in this regards. We are concerned about organizations using the TNC map of HCV-1 areas to determine areas of specified risk in their supply areas. The HCV-1 mapping appears general in nature and designates a large area of the central and southern Appalachians as an area of specified risk to HCV-1. How accurate are the sources of the data used in	Suggest the HCV-1 areas be	the FSC International template. The Critical Biodiversity Areas remain in the	Economic
identification	the construction of the map? The map does not list or suggest what species or habitats the organization needs	removed from TNC map.	second draft, but	Economic

	to be concerned with or how the organizations DDS should differ in areas designated critical biodiversity areas.		there is added	
	Painting such a broad area as HCV-1 will make a DDS very expensive in the Appalachians.		documentation for	
			the rationale	
			behind the	
			specified risk	
			designations.	
			Specified risk	
			designations are	
			not based on	
			product classes.	
			Additional	
		Remove the ability to specify	documentation	
		risk based on "product	behind the	
		classes". Risk level should		
			rationale of the	
	Specifying risk for certain "product classes" could present the opportunity to allow stakeholders with markets	be set based on the forest as	risk designations	
	that are threatened (ie fiber cost rising due to new competition) or ENGO stakeholders raising unfounded	a whole not on what	has been included	
V. Specified risk	accusations about sustainability to potentially exclude or increase the burden for certain producers by	products are being	in the second draft	
identification	influencing the risk classifications.	extracted.	of the NRA.	Economic
VI. Company				
System				
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			_	
			Additionally, the	
			scale of risk	
			designations has	
	Designations of specified risk are not based upon direct knowledge or analysis of wood supply areas in the US		been reevaluated	
	NRA. Instead the areas of specified risk are broad geographic areas where certain features, species and habitats		to make it easier	
	may or may not exist and certain forestry practices may or may not be occuring. It appears the NRA assumes that		for CHs to	
	forestry activity poses a significant risk every time, imposing control measure burden. The significant risk could		determine if there	
	be caused by circumstances unrelated to forestry activities. The broad geographic designations of specified risk		are areas of	
	and required control measures will impose significant, unwarranted cost and require resources not readily		specified risk	
6.1 Control	available to certificate holders, landowners and loggers. It will be difficult for certificate holders to monitor and		within their supply	
measure req.	enforce this requirement.		chains.	Economic
			The second draft of	
			the NRA includes a	
	FSC US inappropriately requires FSC Certificate Holders to designate control measures for any and all instances		much greater level	
	and types of designated "Specified Risk," as determined by FSC US and FSC International, and potentially any		of documentation	
	interest group through the proposed on-line stakeholder portal. These designations of specified risk are not		and rationale	
	based upon direct knowledge or analysis of wood supply areas. Rather, they are broad geographic areas where		provided for the	
	certain features, species and habitats may exist and where forestry may or may not be occurring, with the		risk designations,	
	assumption that any forestry activity poses a significant risk, thus triggering imposition of Control Measures.		including an	
6.1 Control	This is an unacceptable and unprecedented rationale for imposing additional cost and resource burdens on FSC		assessment of	
				Economic
measure req.	Certificate Holders, landowners and loggers.		whether or not the	Economic

		I		1
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
			to make it easier	
			for CHs to	
			determine if there	
			are areas of	
			specified risk	
			within their supply	
			chains.	
			Additionally, the	
			Control Measures	
			include	
			collaborative	
			dialogues to	
			determine a suite	
			of appropriate	
			mitigation	
			activities that are	
			commensurate	
			with their scale of	
			operations.	
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
			to make it easier	
			for CHs to	
			determine if there	
			are areas of	
			specified risk	
			within their supply	
			chains.	
			Additionally, the	
			Control Measures	
	It is very unclear what an acceptable outcome for a company is. The NRA must spell out a minimum acceptable		include	
6.1 Control	outcome for the control measures by product type. Failure to do so will leave the entire document open to		collaborative	
measure req.	interpretation and that will have a negative outcome.		dialogues to	Economic

		d.t	
		determine a suite	
		of appropriate	
		mitigation	
		activities that are	
		commensurate	
		with their scale of	
		operations.	
		The second draft of	
		the NRA includes a	
		much greater level	
		of documentation	
		and rationale	
		provided for the	
		risk designations,	
		including an	
		assessment of	
		whether or not the	
		HCV is threatened	
		by forest	
		management.	
		Additionally, the	
		scale of risk	
		designations has	
		been reevaluated	
		to make it easier	
		for CHs to	
		determine if there	
		are areas of	
		specified risk	
		within their supply	
		chains.	
		Additionally, the	
		Control Measures	
		include	
		collaborative	
		dialogues to	
		determine a suite	
		of appropriate	
		mitigation	
		activities that are	
	At a high level, the Environmental Chamber expects the control measures in areas of specified risk to be clear,	commensurate	
6.1 Control	mandatory and effective. In addition, it is critical that the performance of these measures must also be auditable	with their scale of	
measure req.	whenever possible to provide assurance to all stakeholders regarding performance.	operations.	Environmental
		The second draft of	
		the NRA includes a	
		much greater level	
		of documentation	
	FSC US inappropriately requires FSC Certificate Holders to designate control measures for any and all instances	and rationale	
	and types of designated "Specified Risk," as determined by FSC US and FSC International, and potentially any	provided for the	
	interest group through the proposed on-line stakeholder portal. These designations of specified risk are not	risk designations,	
	based upon direct knowledge or analysis of wood supply areas. Rather, they are broad geographic areas where	including an	
	certain features, species and habitats may exist and where forestry may or may not be occurring, with the	assessment of	
	assumption that any forestry activity poses a significant risk, thus triggering imposition of Control Measures.	whether or not the	
6.1 Control	This is an unacceptable and unprecedented rationale for imposing additional cost and resource burdens on FSC	HCV is threatened	
measure req.	Certificate Holders, landowners and loggers.	by forest	Economic
measure req.	Certificate floruers, famuowifers affu loggers.	by forest	LCOHOITIC

		management.	
		Additionally, the	
		scale of risk	
		designations has	
		been reevaluated	
		to make it easier	
		for CHs to	
		determine if there	
		are areas of	
		specified risk	
		within their supply	
		chains.	
		Additionally, the	
		Control Measures	
		include	
		collaborative	
1		dialogues to	
		determine a suite	
		of appropriate	
		mitigation	
		activities that are	
		commensurate	
		with their scale of	
		operations.	
	Direct Durchage Supplier Agreements: ESC US does not appreciate the custom of procuring wood to supply	орегинопъ.	
	Direct Purchase Supplier Agreements: FSC US does not appreciate the system of procuring wood to supply		
	manufacturing facilities in the U.S. FSC Chain of Custody Certificate Holders do not own or control the forest		
	resource and can exert only minimal pressure on independent contractors.		
	Supplier Agreements can contain certain requirements, but wood procurement organizations are not equipped		
	or staffed to conduct Supplier Training Programs, impose Control Measures on suppliers and landowners,		
	conduct monitoring, evaluate efficacy of Control Measures and invite expert and stakeholder input.		
	Private forest landowners, loggers and others that are not FSC Certificate Holders will very likely not accept being		
	dictated to by FSC Certificate Holders, FSC US or FSC Certification Bodies. Large investments based forest land		
	holding companies in the U.S. control large areas of productive forest land and have voluntarily chosen not to		
	participate in FSC due to unrealistic restrictions on productivity. Supplier agreements cannot dictate		
	management activities on these privately held ownerships.		
	It is unrealistic that every FSC Certificate Holder would conduct independent training programs not supported by		
	the current existing training infrastructure. A typical paper mill in the South may have upwards of 150 or more	Supplier	
	wood producers/suppliers with wood material coming from hundreds of tracts owned by independent private	agreements are no	
	landowners. Additional FSC Control Measure training programs, above and beyond those logger training	longer required in	
6.2 Purchase type	programs of the SFI Implementation Committees and state forestry agencies, is unrealistic without a full-scale	the second draft of	
reqs.	commitment by FSC US.	the NRA.	Economic
	There is no evidence that FSC is prepared to implement the required supplier training programs. Certificate		
	holders have the expectation that FSC would present a supplier training curriculum plan to certificate holders.		
		Explicit supplier	
	Not reasonable to require cartificate helders to enforce FSC controlled wood argues and colored to the second		
	Not reasonable to require certificate holders to enforce FSC controlled wood program requirements on indirect	training is no	
	purchases of supply chain (independent contractors and landowners) with whom they have no direct contract	longer required in	
6.2 Purchase type	agreement. Prior to this draft US NRA, certificate holder risk assessments confirmation of district of origin was	the second draft of	
reqs.	sufficient.	the NRA.	Economic
	FSC US does not understand the system of procuring wood to supply manufacturing facilities in the U.S. FSC		
	Chain of Custody Certificate Holders do not own or control the forest resource and can exert only minimal		
	influence on independent contractors.	Supplier	
		agreements are no	
	It is even more unrealistic to propose that indirect Wood Suppliers that purchase wood from landowners and	longer required in	
6.2 Durchasa tur-		•	
6.2 Purchase type	then deliver wood to FSC Certificate Holders are in a position to conduct training programs, enforce supplier	the second draft of	F
reqs.	agreements and monitor and evaluate the effectiveness of the FSC Certificate Holder's Control Measures.	the NRA.	Economic

			The term	
			byproduct is no	
	By products should be excluded. Production of these products does not drive forest management decisions and		longer used in the	
6.2 Purchase type	reliable documentation of supply area to a degree necessary to ascertain compliance is not possible. If the rest		second draft of the	
reqs.	of the standard is revised, this may become possible.		NRA.	Economic
1043.	of the standard is revised, this may become possible.		The term	Leonomic
			byproduct is no	
	Promodusts should be excluded. Describes of these products does not drive forest management designers and		* *	
C 2 Durchasa tuma	By products should be excluded. Production of these products does not drive forest management decisions and		longer used in the	
6.2 Purchase type	reliable documentation of supply area to a degree necessary to ascertain compliance is not possible. If the rest		second draft of the	Faanamia
reqs.	of the standard is revised, this may become possible.		NRA.	Economic
	There are no elements required for Type 2 and Type 3 indirect purchases.			
	The NRA requires only a controlled wood policy for Byproducts.	Add Supplier Agreements for		
	The Nivi requires only a controlled wood policy for byproducts.	Type 2 Indirect Purchases		
	Co-products from FSC STD 40-005 require the following:	and Type 3 Indirect		
	6.4 For co-product inputs, The Organization shall document the supply area with proof of purchase from the	Purchases.		
	Supply Unit or by a legally effective and enforceable agreement with the supplier of the co-products that	i dicilases.		
	includes a statement on the sources of origin. This includes:	Within the FSC STD 40-005		
	6.4.1 A written supply agreement shall include:	the requirements for "co-	Supplier	
	a) Information about the geographical origin of the supplied co-products that at minimum reflect the scale	products" differs from what	agreements are no	
	applied in the National Risk Assessment and/or Interim Risk Assessment;	is required for "byproducts"	longer required	
	b) A commitment that, in cases where the material is considered as originating from 'specified risk' areas, the	in the NRA.	and the term	
	supplier will support The Organization in collecting the information necessary for the implementation of	iii tile NNA.	byproduct is no	
	established Control Measures;	The NRA DDS requirement	longer used in the	
6.2 Purchase type	NOTE: For cases where field verification at the Supply Unit level is established by a Control Measure, information	seem weak and should meet	second draft of the	
regs.	used to identify the forest of origin and the whole supply chain relating to that supply shall be collected.	the standard requirements.	NRA.	Economic
reqs.	6.4.2 In the case of a supply agreement, The Organization shall conduct a plausibility check to verify the	the standard requirements.	MIA.	Leonomic
	information provided. These checks shall include at least the following evidentiary criteria:			
	a) Is the supplied timber species commercially harvested in the declared supply area (and carries a CITES			
	certificate if required)?			
	b) Is the type and quality of the supplied material commercially available from the declared supply area?			
	c) Are the distance and means of transportation to The Organization (or to the supplier site in case the supplier			
	is purchasing co-product inputs) consistent with the declared supply area and economically viable?			
	NOTE: It is the responsibility of The Organization to evaluate the above criteria and come to a fair and objective			
	judgment regarding the plausibility and reliability of the information provided by the supplier. The precautionary			
	principle should			
	Direct Purchase Supplier Agreements: While we appreciate FSC US efforts to consider the complexity of			
	procuring wood in the US, the system is still far too complex and it does not provide the type of control that FSC		Supplier	
	is seeking. Certificate Holders do not own or control the forest resource and, thus, can only provide limited		agreements are no	
	requirements. Of concern is the extent of expectation FSC US has by identifying significant parts of the US as		longer required in	
6.2 Purchase type	specified risk. Trying to establish control measures on such an extent is not feasible (due to ownership and		the second draft of	
regs.	supply chain) even through a recognition of the types of purchase (e.g. direct, indirect and byproducts).		the NRA.	Economic
	Section 6.2.1 FSC US does not understand the system of procuring wood to supply manufacturing facilities in the			
	U.S. FSC Chain of Custody Certificate Holders do not own or control the forest resource and can exert only			
	minimal influence on independent contractors.			
	Supplier Agreements can contain certain requirements, but wood procurement organizations are not equipped			
	or staffed to conduct Supplier Training Programs, impose Control Measures on suppliers and landowners,			
	conduct monitoring, evaluate efficacy of Control Measures and invite expert and stakeholder input.			
			Supplier	
	It is unrealistic that every FSC Certificate Holder would conduct their own independent training programs. Our		agreements are no	
	Roaring Spring, PA facility has upwards of 100 wood producers/suppliers with wood material coming from		longer required in	
6.2 Purchase type	hundreds of tracts owned by independent private landowners. Additional FSC Control Measure training		the second draft of	
reqs.	programs, above and beyond those logger training programs of the SFI Implementation Committees and state		the NRA.	Economic
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	forestry agencies, is unrealistic without a full-scale commitment by FSC US.			
	Section 6.2.2 It is even more unrealistic to propose that indirect Wood Suppliers that purchase wood from			
	landowners and then deliver wood to FSC Certificate Holders are in a position to conduct training programs,			
	enforce supplier agreements and monitor and evaluate the effectiveness of the FSC Certificate Holder's Control			
	Measures.			
	FSC US inappropriately proposes legally binding Supplier Agreements between FSC Certificate Holders and Direct			
	Purchase landowners and Wood Producers to implement FSC Control Measures.			
	The alternative assessment of the FCC IIC and assessment in the second of the second o		Complian	
	The alternative measures proposed by FSC US are unrealistic in terms of requiring field verification of Control Measures based upon a sub-sample, or Management Plans addressing required Control Measures and field		Supplier agreements are no	
	verification. Wood procurement organizations are not sufficiently staffed or capable of implementing written		longer required in	
6.3 Supplier	management plans and field verification. The cost of the proposed actions will force certificate holders out of the		the second draft of	
Agreements	program.		the NRA.	Economic
		FSC US should establish		
		"training" for each control		
		measure and geographic		
		area that can be accessed		
		through the stakeholder		
		portal. Certificate holders to provide communication to		
		suppliers directing them to		
		the portal for information		
		about areas of specified risk		
		and control measures. This		
		would eliminate duplication		
		of efforts, standardize the		
	Magnitude of this issue is unknown until the control measures are published for all categories. Worst case	message, and reduce CH		
	scenario would be to have a variety of control measures impacting groups of suppliers in different areas. This will	time and expense to	Supplier	
	be a burden to administer and keep up to date. Field verification would require development of evaluation forms	implement.	agreements and	
	for each control measure, and delineation of the geographic area where they would be applied. Lists of suppliers to be sampled will need to be kept current as they change areas.	Suppliers who are certified	explicit supplier training are no	
	Suppliers servicing multiple markets are likely to have different requirements for	themselves should be	longer required in	
6.3 Supplier	agreements/monitoring/training established by each of their certified customers.	exempt from supplier	the second draft of	
Agreements	All this is costly and redundant.	agreements and training.	the NRA.	Economic
		-	Supplier	
			agreements are no	
	Re NOTE: "Verification by other forest certification systems" Does this mean to imply the other auditing system	Clarify intent in this note. It's	longer required in	
6.3 Supplier	must directly and specifically list the specified risk and control measures OR that the purchaser audits	unclear – see question in left	the second draft of	
Agreements	certification reports from other certification systems to make sure this is addressed?	column.	the NRA.	Economic
		One clarification may help – what forms can the supplier		
		agreements take? Given		
		procurement-only		
		companies typically maintain		
		one overarching contract		
		with a supplier and then		
		make "sub-contracts" for		
		specific product deliveries,		
		there may be times when	Supplier	
		there is specified risk and when there isn't, with the	agreements are no longer required in	
6.3 Supplier	This seems reasonable. Most companies already include the CW language in their supplier agreements, and this	same supplier. So would an	the second draft of	
Agreements	seems to be an extension of that. Also really appreciate the note regarding other forest certification programs.	email or a signed side	the NRA.	Economic
	1 to the factorial of the first field for the force regulating of the forest certained to find from the	2a. 0. a 0.bca 0.ac		

			T	
		agreement that just		
		addressed those instances in		
		which control measures		
		suffice?		
	Supplier agreements. A system for addressing specified risk that pushes the responsibility for controlling risks to			
	the landowner through supplier agreements is not only unworkable, but potentially harmful to supplier			
	relationships throughout the supply chain. The decision to source from non-specified risk areas is the			
	responsibility of the CoC holder and the NRA should be a tool to help make that determination. Supplier			
	agreements are only as reliable as those who are signing them. Suppliers who are the more informed will be less			
	likely to sign highly- restrictive FSC-required supplier agreements that cover non-FSC certified controlled wood. If			
	a supplier is actually willing to commit to all that is required, they would probably be FSC forest management			
	certified. The NRA should not be a tool to force forest certification standards on private landowners. This		Supplier	
	problem becomes more egregious when FSC ignores the value of third-party certification from SFI and ATFS and		agreements are no	
	requires certified landowner to "do more" in the form of implementing duplicative control measures from a risk		longer required in	
6.3 Supplier	assessment that was produced using "expert opinion". We strongly recommend the requirement for supplier		the second draft of	
				Faanamia
Agreements	agreements be removed in order to prevent unnecessary disruptions in the supply chain.		the NRA.	Economic
	Inappropriate to require legally binding supplier agreements to implement control measures. In many cases			
	certificate holders will be asking non-FSC participants to agree to these terms and the burdensome requirements			
	attached to the control measures. Acutal successful implementation of control measures is a concern for			
	suppliers, who are not FSC certificate holders themselves.			
	Certificate holders are not in the position to enforce FSC control measures or demand to see management plans			
	with suppliers, independent landowners, and logging contractors who have not voluntarily chosen to participate			
	in the FSC certification scheme. Suppliers are not sufficiently staffed to write management plans for every tract.			
	Attempts to implement field inspections becomes increasing difficult as one moves down the links of the supply			
	chain. Private landowners may not give land access permission to FSC field verifiers, and they are not legally			
	bound to give such permission for land access.		Supplier	
	bound to give such permission for faint access.			
			agreements are no	
	Certificate holders cannot practically segregate non-complying inputs from other certified and controlled		longer required in	
6.3 Supplier	material in every case where there potentially may be control measure implementation issues by a single		the second draft of	
Agreements	supplier.		the NRA.	Economic
	Evergreen Packaging is not in a position to seek or enforce Supplier Agreements with independent landowners		Supplier	
	and loggers that have not voluntarily chosen to participate in the FSC scheme. While Evergreen Packaging clearly		agreements are no	
	takes steps to influence landowners and loggers to comply with laws and regulations, implement BMPs, become		longer required in	
6.3 Supplier	SFI Logger Trained, and take other proactive measures, it is not reasonable to propose that procurement		the second draft of	
Agreements	organizations require Control Measures on independent businesses that go beyond current laws and regulations.		the NRA.	Economic
	Supplier Agreements can contain certain requirements, but wood procurement organizations are not equipped			
	or staffed to conduct Supplier Training Programs, impose Control Measures on suppliers and landowners,			
	conduct monitoring, evaluate efficacy of Control Measures and invite expert and stakeholder input.			
	FSC US inappropriately proposes legally binding Supplier Agreements between FSC Certificate Holders and Direct			
	Purchase landowners and Wood Producers to implement FSC Control Measures.			
	The alternative measures proposed by FSC US are even more unrealistic in terms of requiring field verification of			
	Control Measures based upon a sub-sample, or Management Plans addressing required Control Measures and			
	· · · · · · · · · · · · · · · · · · ·			
	field verification. Wood procurement organizations are not sufficiently staffed or capable of implementing such			
	written agreements, supplier training, management plan development and field verification.			
	It is not reasonable that FSC Certificate Holders can avoid sourcing wood, where suppliers and landowners refuse			
	to abide by arbitrary and costly Control Measures. Most large manufacturing facilities cannot logistically or		Supplier	
	practically segregate non-complying inputs from other certified and controlled material. Wood yards cannot			
	1, , , , , , , , , , , , , , , , , , ,		agreements are no	
	hold and account for separate inventories, let alone run exclusive batch runs of certified vs. uncontrolled		longer required in	
6.3 Supplier	material inputs. The only practical result is "boycotts" of certain lands, habitat types and forest practices that		the second draft of	
Agreements	the FSC US has unilaterally decided are no longer acceptable.		the NRA.	Economic

6.3 Supplier Agreements	"direct sourcing" and "type 1 indirect sourcing", it is critical that these agreements be in place to ensure that the designated risk is being adequately addressed. Therefore, the system must strongly encourage these agreements and not provide an easy way out. Currently the NRA is far too wide open about when alternatives		Supplier agreements are no longer required in	Environmental
6.3 Supplier Agreements	Additional field verification requirements are going to add a large cost to supply areas where previously could be managed by one staff an additional staff may be necessary. Some TIMOs and landowners are hesitant to let field visits occur within their land. It is clear that the intent is to allow for additional measures to be implemented when supplier agreements are not feasible, however the wording is too poor to support this from an auditing perspective. Some control measures are written at a landscape level outcome and are not written against a specific harvesting outcome such as BMPs. The supplier agreement wording will not catch these landscape level control measures in any effective way that will lead to impacts on the ground. Where control measures have a measurable result such as following BMPs this wording makes sense and should be included. Where impacts of supplier agreements will have no direct impacts on harvesting, control measures will need to be implemented in other ways. "Other certification systems" note: This implies that a management plan, certification report, and level of risk is included. Because certifications sometimes just call for effective BMP implementation on roads and streams it would be redundant to highlight that BMPs are being met. This wording should be clearer. Half of this is already in place in 6.3.2ii. The note should reflect only what the intent is. The note should read that the management plan and audit documents include a reference to the control measures that are used to control risk and an audit via a 3rd party of those control measures. The proposed control measures have a strong reliance on supplier agreements to address specified risk. For	met. ADD wording: for each control measure implemented having impacts on forestry operations such as BMPs. [so that it is possible to place them in supplier agreements or other communications] Change note to read: Verification by other forest certification systems is acceptable when item 6.3.2ii is used providing that a 3rd party inspects systems for upholding control measures and the management plan of the organization upholding those control measures. Example 3rd party BMP audit, 3rd party verification of age class and distribution or habitat maintenance.	Field verification is no longer required in the second draft of the NRA.	Economic
6.3 Supplier Agreements	cannot delve into the supply chains of our suppliers due to anti-trust issues. As mentioned earlier, there are also several very large, national scale suppliers that are hostile to FSC in general. This places the fate of the system into their hands and is an unconsidered outcome of this requirement. Compliance needs to rest in the hands of the certified company. This is the only way that they system can remain viable and credible.	Insert an OR between two sections as verification is allowed if 6.3.1 cannot be	agreements are no longer required in the second draft of the NRA.	Economic
6.3 Supplier Agreements	refuse to implement certain control measures. See prior comment above: it will not be achievable for mills to avoid or "exclude" such materials. The field verification alternative (in lieu of supplier agreements for direct & type 1 indirect purchases) is not achievable. First, landowners are under no legal obligation to allow 3rd parties onto their property for such purposes (other than to ensure legal harvesting). Second, this will be cost prohibitive for wood procuring mills. Even on a sampling basis, this would be a significant program to implement in terms of additional personnel and resources. Supplier developed management plans is not an achievable alternative (in lieu of supplier agreements for direct & type 1 indirect purchases). First, suppliers cannot dictate to private landowners how they should manage their property, so long as the landowner is otherwise in legal & regulatory compliance. Second, this would be cost prohibitive for wood suppliers. This is not a customary function of wood suppliers, and they would have to develop in-house expertise or more likely engage consultants at very significant added cost. There is a question about supplier agreements requiring compliance with FSC CW by a non-certified supplier. This is not generally going to be feasible. In many instances, manufacturers of fiber products and solid wood		Supplier agreements are no longer required in the second draft of the NRA. Supplier	Economic
	It is not achievable for supplier agreements , for either direct or type 1 indirect purchases, to contain language that requires them to impose many of the proposed control measures, beyond what is required by existing law or regulation, on the independent private landowners from whom they source wood. Landowners may simply			

			1	Economic
6.3 Supplier	Section 6.3.1 FSC US inappropriately proposes legally binding Supplier Agreements between FSC Certificate		Supplier	
Agreements	management activities on privately held ownerships and we as a certificate holder do not feel it is necessary.		the NRA.	Economic
6.3 Supplier	dictated to by FSC Certificate Holders, FSC US or FSC Certification Bodies. Supplier Agreements cannot dictate		the second draft of	
	Private forest landowners, loggers and others that are not FSC Certificate Holders will very likely not accept being		longer required in	
	monitoring, evaluate efficacy of Control Measures and/or invite expert and stakeholder input.		agreements are no	
	or staffed to: conduct Supplier Training Programs, impose Control Measures on suppliers/landowners, conduct		Supplier	
	Supplier Agreements can contain certain requirements, but wood procurement organizations are not equipped			
Agreements	the market for these suppliers.	entirety.	the NRA.	Economic
6.3 Supplier	financially viable market for wood products in the area and these agreements may create a barrier-to-entry to	6.3.2, and 6.3.3 in their	the second draft of	
	agreements on private landowners is not reasonable. In some instances the FSC certificate holder mill is the only	6.2.2. Remove 6.3, 6.3.1,	longer required in	
	area. current laws and regulations, with independent loggers who must enforce the requirements of those	agreements from 6.2.1 and	agreements are no	
	MWV suggests removing Supplier Agreements as a requirement for addressing specified risk within the supply	Remove supplier	Supplier	
	enforce Supplier Agreements that go beyond			
	implement BMPs, take part in logger training programs, and other proactive measures Asking U.S. companies to			
-	MWV already takes significant steps to influence landowners and loggers to comply with laws and regulations,			
Agreements	implement specific control measures.	logs.	the NRA.	Economic
6.3 Supplier	not be possible to enter into supplier agreements for type 2 direct purchases and type 1 indirect purchases that	the source of the suppliers	the second draft of	
	Where the organization does not have the ability to influence a suppliers forest management activities it may	species is known to exist at	longer required in	
		to be followed unless a RTE	agreements are no	
		mandate control measures	Supplier	
		only recommend and not		
	a man ook par on ook o sapprior of	Suggest supplier agreements		20011011110
Agreements	1 indirect purchase suppliers.	Organization.	the NRA.	Economic
6.3 Supplier	The current requirement requires supplier agreements between the Organization and direct purchase and Type	agreement with the	the second draft of	
		to have a supplier	longer required in	
		suppliers should be required	agreements are no	
g. 22		All types of indirect purchase	Supplier	
Agreements	or reports.	reports.	the NRA.	Economic
6.3 Supplier	methods described in 7.4 for indirect purchases that include stakeholder feedback and state agency inspections	state agency inspections or	the second draft of	
	prove to be a difficult contract to develop and implement. FSC-US should instead consider relying on monitoring	stakeholder feedback and	longer required in	
	participating suppliers to agree to these terms and the burdensome requirements attached to them. This may	purchases that include	agreements are no	
	"direct suppliers," as defined in the NRA. In many cases, the Certificate Holders would be asking non-FSC	described in 7.4 for indirect	Supplier	
	FSC-US is proposing that the proposed Control Measures be implemented through supply agreements with	monitoring methods		
	Supplier Agreements (6.3)	consider relying on		
		FSC-US should instead		
	designated risk.			
	specified risk, must be audited to evaluate the sufficiency of the management measures addressing the			
	measures. And the elements of the alternative plan, as well as the performance of the plan in addressing the			
	designation. To be an acceptable alternative, the plan must contain the substantive equivalent to the control			
	management plans must explicitly include the control measures for HCV protection, as indicated in the risk			
	certificate holder is relying on another certification scheme or management plan to mitigate risk, the			
	something outside of FSC's control. Therefore reliance on these tools must be very deliberate. In particular, if a			
	be relied on to address specified risk, we are potentially exposing FSC performance and the FSC brand to			
	certification to satisfactorily address the specified risk at hand. If something outside of the FSC process were to			
	There is also significant concern about relying on a forest management plan or an alternative forest management			
	The state of the s			
	for the different relationships among certificate holders and their suppliers.			
	measures, it may be necessary to develop new, more focused classifications, designed to give specific direction			
	Without the ability to bring these "direct" and "type 1 indirect" suppliers into alignment with the control			
	expectation that certificate holders will be able to employ these agreements with their supply chain partners.			
	aren't feasible. Exceptions from the requirement for a supplier agreement must be more limited with an			
	could mean anything, especially if it's up to the purchaser company to determine when supplier agreements		the NRA.	
i	control measures may be substituted for supplier agreements with a "not feasible" threshold. "Not feasible"		the second draft of	

			Latina and a	
			alternative	
	Section 6.3.2 The alternative measures proposed by FSC US are even more unrealistic in terms of requiring field		measures are no	
	verification of Control Measures based upon a sub-sample, or Management Plans addressing required Control		longer required in	
	Measures and field verification. We are not sufficiently staffed or capable of implementing such written		the second draft of	
	agreements, supplier training, management plan development and field verification.		the NRA.	
	agreements, supplier training, management pair acticipment and real termination.		the raid ti	
	6.2.2 It is not reasonable that ESC Cortificate Holders can avoid covering wood where symplices and landswares			
	6.3.3 It is not reasonable that FSC Certificate Holders can avoid sourcing wood, where suppliers and landowners			
	refuse to abide by arbitrary and costly Control Measures. Appvion's Roaring Spring facility cannot logistically or			
	practically segregate non-complying inputs from other certified and controlled material. Our wood yard cannot			
	hold and account for separate inventories, let alone run exclusive batch runs of certified vs. uncontrolled			
	material inputs. The only practical result is "boycotts" of certain lands, habitat types and forest practices that			
	the FSC US has unilaterally decided are no longer acceptable.			
		Company policies suffice to		
		implement control		
		'	Cumpling	
		measures. Procurement	Supplier	
		foresters are educated	agreements or any	
		enough to impose control	alternative	
	These arrangements are somewhat restrictive.	measures or cease	measures are no	
	No rights of egress or regress exist on material purchased indirectly so how can a company implement a field	purchases when they are	longer required in	
6.3 Supplier	verification program from those supplies? Only option for US companies would be to incorporate each control	aware of a risk identified via	the second draft of	
Agreements	measure not the supplier agreements.	the DDS.	the NRA.	Economic
3	0	-	Supplier	
			agreements or any	
	Cumpling Agreements and alternate macrouses. The concept of "Cumpling Agreements" impaced by ECC Continues		,	
	Supplier Agreements and alternate measures: The concept of "Supplier Agreements" imposed by FSC Certificate		alternative	
	Holders on largely private non-industrial landowners and independent contract loggers is unworkable as		measures are no	
	proposed. There is not a labor force sufficient to administer and enforce such agreements. Above all, this		longer required in	
6.3 Question for	requirement will allow large non-FSC participating organizations to control the future of the FSC program by		the second draft of	
Consultation	simply choosing not to sign agreements with FSC restrictions.		the NRA.	Economic
		Minimize or eliminate		
		requirements for supplier		
		agreements. It is costly to		
		implement changes to	Supplier	
		contracts, and requirements		
			agreements or any	
		may prove to be a	alternative	
		disadvantage when	measures are no	
		competing with non-FSC	longer required in	
6.3 Question for	Supplier Agreements, and alternative measures provide some choices to the CH, but all remain costly, time	markets that do not	the second draft of	
Consultation	consuming, and focused on proving a negative i.e. that damage is not done when harvesting occurs.	mandate these agreements.	the NRA.	Economic
		See general note above. If		
		you want to maintain the	Supplier	
		current level of FSC fiber	agreements or any	
		(including mix) in the	alternative	
		'		
1	We all the second secon	system, then I think it's too	measures are no	
1	"Supplier agreements, and alternative measures, are intended to ensure that suppliers comply with the	restrictive. I expect some	longer required in	
6.3 Question for	controlled wood program while still allowing companies the flexibility to implement verification in a manner that	suppliers will be unwilling to	the second draft of	
Consultation	works with their supply chain. Are these measures sufficient, insufficient, or too restrictive?"	sign any such agreement.	the NRA.	Economic
			Supplier	
			agreements or any	
	Certificate holders have limited ability to monitor large number of independent landowners using the specified		alternative	
	field verification protocols. Suppliers are not sufficiently staffed and may not have the technical knowledge to		measures are no	
	develop management plans that would satisfy the FSC standard control measures. If supplier agreements		longer required in	
6.3 Question for	become more restrictive, more suppliers and landowners will leave the controlled wood system and not		the second draft of	
Consultation	, , , , , , , , , , , , , , , , , , , ,			Faanamia
LODSUITATION	participate.		the NRA.	Economic

Our primary mills have limited ability to monitor the independent landowners using field verification protocols specified. Suppliers are generally too small for the option of a management plan developed by the supplier to be closed. Our primary mills have limited ability to monitor the independent landowners using field verification protocols specified. Suppliers agreements or any alternative measures are no longer required in the second dark of control Measures. Sec Us Should instead consider relying on monitoring methods described in 74 for indirect purchase that includes absolubile relevable washedder relevable or dealer when the applicant of developing management plans for fundowners, particularly regarding merciptive and restrictive control measures. Sec Us Should instead consider relying on monitoring methods described in 74 for indirect purchases that includes absolubiled relevable valued in the second dark of consolidation. Supplier agreements and other measures that require compliance on learning methods described in 74 for indirect purchases that includes absolubiled relevable and state designed in the second dark of the second dark of the consolidation of the second dark of the second dark of the complex of the second dark of the consolidation of the second dark of the second dark of the consolidation of the second dark of the			1	T	
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verification. Even a random sampling begins a process of attempting to exert control beyond the necessary 6.3 Question for Consultation measure beyond certificate holders' capability or necessity. Apprion is not in a position to enforce Supplier Agreements with independent landowners and loggers that have landowner) and that is what the NRA seems to try to accomplish. the NRA seems to try to accomplish. Economic Supplier		Measures based upon a sub-sample, or Management Plans addressing required Control Measures and field	participant (e.g. a forest	measures are no	
6.3 Question for Consultation measures. Controlled Wood is supposed to be a risk based program It is becoming an extensive control the NRA seems to try to accomplish. the NRA. Economic Approximation to enforce Supplier Agreements with independent landowners and loggers that have Supplier		verification. Even a random sampling begins a process of attempting to exert control beyond the necessary	-		
Consultation measure beyond certificate holders' capability or necessity. accomplish. the NRA. Economic 6.3 Question for Appvion is not in a position to enforce Supplier Agreements with independent landowners and loggers that have Supplier	6.3 Question for				
6.3 Question for Appvion is not in a position to enforce Supplier Agreements with independent landowners and loggers that have Supplier	-				Faanamia
		·	accomplish.		ECOHOHHC
Consultation not voluntarily chosen to participate in the FSC scheme. While we takes steps to influence landowners and agreements or any Economic				Supplier	
	Consultation	not voluntarily chosen to participate in the FSC scheme. While we takes steps to influence landowners and		agreements or any	Economic

			T .	T
	loggers to comply with laws and regulations, implement BMPs, become SFI Logger Trained and take other		alternative	
	proactive measures, it is not reasonable to propose that procurement organizations require and enforce Control		measures are no	
	Measures on independent businesses that go beyond current laws and regulations.		longer required in	
			the second draft of	
	We have a limited ability to monitor the independent landowners using field verification protocols specified.		the NRA.	
	Suppliers (loggers/wood producers) are generally too small and unsophisticated to implement the option of		the MIA.	
	developing management plans for landowners, particularly regarding prescriptive and restrictive Control			
	Measures.			
		Automatic acceptance of		
		Stewardship Forest and ATFS		
		management plans should		
6.3 Question for		be recognized without	Thank you for your	
=		•		F
Consultation	Elements of acceptable forest management plan will have to be presented and easily achieved.	modification.	comment.	Economic
		FSC US must assume		
		responsibility for generic		
		training and seek to avoid		
		duplicative training		
		programs. It is unrealistic to		
I		expect that loggers, wood	Explicit supplier	
		_ ==		
		producers and land	training is no	
		managers can or would	longer required in	
		attend multiple training	the second draft of	
		programs conducted by	the NRA. The	
		different FSC Certificate	second draft of the	
	Supplier Training Programs: FSC US does not appreciate the effort that has gone into developing and	Holders.	NRA includes a	
	administering the SFI Logger Training Programs at the state level. Such training programs only make sense as a	Troiders.	control measure	
		FCC LIC must assume		
	collective effort by willing procurement organizations, state forestry associations, state forestry agencies,	FSC US must assume	that requires a CH	
	universities and the logging community. FSC US has not made the effort to understand what would involved in a	responsibility for developing	to provide	
	training program to implement Control Measures that would further limit the property rights of landowners and	and coordinating any such	educational	
	managers that are not enrolled in the FSC Program.	training of its arbitrarily	information	
		imposed areas of Specified	(developed by FSC	
6.4 Supplier	It is unrealistic to expect that loggers, wood producers and land managers can or would attend multiple training	Risk and mandatory Control	US) to be provided	
Training	programs conducted by different FSC Certificate Holders.	Measures.	to suppliers.	Economic
Trailing	programs conducted by different 13C certificate finders.	Wedsures.		LCOHOIIIC
		6 60 1	Explicit supplier	
		See 6.3 above	training is no	
			longer required in	
		Identify control measures	the second draft of	
		with the most potential to	the NRA. The	
		impact the forest. Set	second draft of the	
		priorities, and roll out	NRA includes a	
		training or information in a	control measure	
		way to be able to achieve	that requires a CH	
	It is impractical to require that training information be passed "down the supply chain as necessary to facilitate	results. Simultaneous	to provide	
	the implementation of the control measures". It is unrealistic to think that CHs have the ability to ensure this	requirements for training on	educational	
	happens.	multiple control measures	information	
	With limited resources, training should be prioritized, and provided to "willing workers" first.	will overwhelm the target	(developed by FSC	
6.4 Supplier	Until control measures are established and implemented, there is no way of knowing if they will be effective or	audience and probably turn	US) to be provided	
Training	not.	them off.	to suppliers.	Economic
		chem on.		LCOHOLLIC
			Explicit supplier	
	It is unrealistic that every FSC Certificate Holder would conduct their own independent training programs. A		training is no	
	typical paper mill in the South may have upwards of 150 or more wood producers/suppliers with wood material		longer required in	
	coming from hundreds of tracts owned by independent private landowners. Additional FSC Control Measure		the second draft of	
6.4 Supplier	training programs, above and beyond those logger training programs of the SFI Implementation Committees and		the NRA. The	
Training	state forestry agencies, is unrealistic without a full-scale commitment by FSC US.		second draft of the	Economic
11 all lillig	State forestly agencies, is unrealistic without a full-scale committed by 130 03.		second draft of tile	LCOHOTTIC

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			NRA includes a	
			control measure	
			that requires a CH	
			to provide	
			educational	
			information	
			(developed by FSC	
			US) to be provided	
			to suppliers.	
			Explicit supplier	
			training is no	
			longer required in	
			the second draft of	
			the NRA. The	
			second draft of the	
	The requirements are broad. This could turn out to be a significant effort on the part of individual certificate		NRA includes a	
	holders. Something like this is most efficiently & effectively implemented as a collective effort; however, FSC-US		control measure	
	does not have the necessary infrastructure in place to accomplish as a collective effort. The SFI certified sourcing		that requires a CH	
	logger training program is excellent, covers BMP compliance, T&E awareness, and various other relevant topics.		to provide	
	It is already well established.		educational	
	it is already well established.	Expressly recognize SFI	information	
	For time 7 indicate and by made to make the requirement is not auditable or achievable that "symplices	. , .		
6.4.6	For type 2 indirect and by-product purchases, the requirement is not auditable or achievable that "suppliers	certified sourcing logger	(developed by FSC	
6.4 Supplier	pass training information as far down the supply chain as necessary to facilitate implementation of the control	training programs as	US) to be provided	
Training	measures."	satisfying this requirement.	to suppliers.	Economic
			Explicit supplier	
			training is no	
			longer required in	
			the second draft of	
			the NRA. The	
			second draft of the	
			NRA includes a	
			control measure	
			that requires a CH	
			to provide	
	This project of the based of the project by NDA DDC is to be a second or control or cont	Change wording C 4 1	•	
	This requirement is too broad. If the goal of the NRA-DDS is to have impact on control measure the wording	Change wording 6.4.1 -	educational	
	should be specific to the supply area. Not just training on a general basis.	"trained in effective	information	
		implementation of control	(developed by FSC	
6.4 Supplier	Note below 6.4.3: IP does not see the resources for this to occur. Not sure that a note should be present here if	measures identified within	US) to be provided	
Training	this will not be followed through on.	their supply area. "	to suppliers.	Economic
			Explicit supplier	
			training is no	
			longer required in	
			the second draft of	
			the NRA. The	
			second draft of the	
			NRA includes a	
			control measure	
			that requires a CH	
			•	
			to provide	
			educational	
	FSC-US will develop Regional Processes to come up with regionally standardized Controlled Wood materials		information	
	where these conflicts arise.	Be proactive, develop and	(developed by FSC	
6.4 Supplier		define training prior to	US) to be provided	
Training	WHY WAIT for conflict?	effective date of this NRA.	to suppliers.	Economic

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			Explicit supplier	
			training is no	
			longer required in	
			the second draft of	
			the NRA. The	
			second draft of the	
			NRA includes a	
			control measure	
			that requires a CH	
			to provide	
		6.4.2 "For indirect	educational	
		purchases, the Organization	information	
		ensures that suppliers	(developed by FSC	
6.4 Supplier	FSC certificate holders can provide training to their direct suppliers, they cannot "ensure" that the information	receive the supplier training	US) to be provided	
Training	gets passed any further along the supply chain and this expectation is unreasonable.	information."	to suppliers.	Economic
Trailling	gets passed any further along the supply chain and this expectation is unleasonable.	illiorillation.		ECOHOHIIC
			Explicit supplier	
			training is no	
			longer required in	
			the second draft of	
			the NRA. The	
			second draft of the	
			NRA includes a	
			control measure	
			that requires a CH	
			to provide	
		Cannot pass and then find	educational	
		•		
		out what is in it. Please	information	
	It is essential that these regional processes are developed and communicated before the requirement is in place,	derive the concept of	(developed by FSC	
6.4 Supplier	or else compliance will be expensive or impossible to achieve. Conflicts between training programs would be	supplier training for review	US) to be provided	
Training	damaging for credibility.	in next comment period.	to suppliers.	Economic
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
		I	whether or not the	
1				
1			HCV is threatened	
			by forest	
			by forest management.	
			by forest	
			by forest management.	
			by forest management. Additionally, the scale of risk	
			by forest management. Additionally, the scale of risk designations has	
			by forest management. Additionally, the scale of risk designations has been reevaluated	
			by forest management. Additionally, the scale of risk designations has been reevaluated to make it easier	
			by forest management. Additionally, the scale of risk designations has been reevaluated to make it easier for CHs to	
			by forest management. Additionally, the scale of risk designations has been reevaluated to make it easier for CHs to determine if there	
	I cannot comment on this section given the nature of the specified risk. I do not have a mechanism that would		by forest management. Additionally, the scale of risk designations has been reevaluated to make it easier for CHs to determine if there are areas of	
	allow my company to monitor effectiveness of control measures on unmapped PFTs or legal conversion with the		by forest management. Additionally, the scale of risk designations has been reevaluated to make it easier for CHs to determine if there are areas of specified risk	
VII. Monitoring & Evaluation	· ·		by forest management. Additionally, the scale of risk designations has been reevaluated to make it easier for CHs to determine if there are areas of	Economic

		I	The second duelt of	
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
	To ensure credibility, it is critical that performance of the control measures is audited to ascertain effectiveness		been reevaluated	
	in the woods. While it is important to audit the plan to ensure it addresses the risk identified, it is just as		to make it easier	
	important to verify that the management plan is indeed achieving the desired objectives on the ground.		for CHs to	
	Reliance on verification through other certification schemes is problematic due to the well-known weakness of		determine if there	
	competing schemes. Reliance on alternative certification schemes might be allowable if the verification		are areas of	
	requirements for management plans and for addressing designated risks matched the rigor of the FSC system.		specified risk	
VII. Monitoring &	Unless that equivalence can be ascertained, other measures -beyond reliance on other certification schemes -		within their supply	
Evaluation	would be required.		chains.	Environmental
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
			to make it easier	
			for CHs to	
			determine if there	
			are areas of	
			specified risk	
			within their supply	
			chains. Monitoring	
	The Organization should establish adequate monitoring procedures that require CB approval prior to indirect		is not explicitly	
VII. Monitoring &	purchase; the procedures will differ due to the variations of indirect purchases so approval would be required for		included as a	
Evaluation	the variations.		control measure.	Economic
	Field Verification: There are two important considerations here: 1) There is significant cost associated with		Field verification is	2001011110
	completing field monitoring visits. These harvest sites can be at locations in other states and even in other		no longer required	
7.1 Field	countries. As written this will be a significant financial burden for certificate holders. 2) You are asking the		in the second draft	
Verification	certificate holder to collect information on the effectiveness of control measure elements that occur on		of the NRA. The	Economic
verification	Continuate notice to concet information on the effectiveness of control measure elements that occur on		or the MIA. THE	LCGHOTTIC

	someone else's private forest ownership and then make the results part of a publically available certification		second draft of the	
	report. Private landowners will deny access to certificate holders.		NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
			to make it easier	
			for CHs to	
			determine if there	
			are areas of	
			specified risk	
			within their supply	
			chains.	
			Field verification is	
			no longer required	
			in the second draft	
			of the NRA. The	
			second draft of the	
			NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
			to make it easier	
			for CHs to	
			determine if there	
		Base sampling on the	are areas of	
		number of suppliers, with	specified risk	
7.1 Field		exemptions for certified	within their supply	
Verification	Concern about the field verification based on the number of supply sites.	suppliers.	chains.	Economic
	"Field verification program will focus on areas where specified risk are known" But 6.3.3 says the field	Make consistent with 6.3.3	Field verification is	
7.1 Field	verification program should be a RANDOM sample of 0.8 * sq rt of suppliers? Is this in addition to 6.3.3?		no longer required	
Verification		Give an actual expectation –	in the second draft	Economic

	Place remove the subjective terms. Who since of the field wife time and the subjective terms.	for englished viels areas	of the NDA The	
	Please remove the subjective terms – "the rigor of the field verification program is commensurate with the level	for specified risk areas;	of the NRA. The	
	of risk."	sampling shall be increased	second draft of the	
		by x	NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
			to make it easier	
			for CHs to	
			determine if there	
			are areas of specified risk	
			within their supply	
			chains.	
			Field verification is	
			no longer required	
			in the second draft	
			of the NRA. The	
			second draft of the	
			NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
	Certificate holders could conduct field verification, but could not measure effectiveness without significant		to make it easier	
	resources for study. The requirement is vague and broad, open to conflicting interpretation.		for CHs to	
			determine if there	
	Such a requirement would impose "particular habitat elements" be left on land owned by independent		are areas of	
	landowners not enrolled in the FSC program. Certificate holders have no position as an enforcement agent		specified risk	
7.1 Field	regarding a landowners management decisions that are legal but may not agree with FSC imposed control		within their supply	
				Economic
Verification	measures.		chains.	ECOHOITIIC

		Monitoring	-
		required in	
		second dra	ft of the
		NRA. The se	econd
		draft of the	e NRA
		includes a r	much
		greater leve	el of
		documenta	ation
		and rationa	ale
		provided fo	or the
		risk designa	
		including ar	
		assessment	
		whether or	
		HCV is thre	
		by forest	
		manageme	ent.
		Additionally	
		scale of risk	
		designation	
		been reeva	
		to make it e	
		for CHs to	Sasiei
		determine	if there
		are areas of	
	Monitoring of direct suppliers is already done under SFI, with some challenges. Expanding the scale and scope of	specified ri	
7.1 Field	such direct monitoring will require significant additional resources and offer limited benefits. Refer to "General	within their	
Verification	Comments" above.	chains.	Economic
verincation	Comments above.	Field verific	
		and monito no longer re	
		in the seco	
		of the NRA	
		second dra	
		NRA include	
		much great	
		of documer	
		and rationa	
		provided fo	
		risk designa	
		including a	
		assessment	
	Monitoring of direct suppliers is already done under SFI, with some challenges. Expanding the scale and scope of	whether or	
	such direct monitoring will require significant additional resources and offer limited benefits. Refer to "General	HCV is three	atened
	Comments" above.	by forest	
		manageme	
	It is not realistic to expect, without sufficient justification, that FSC Certificate Holders could conduct field	Additionally	**
	verification to monitor implementation of Control Measures and their effectiveness. The requirement is overly	scale of risk	
	vague and open to broad and conflicting interpretation.	designation	
		been reeva	
	FSC US suggests that a Control Measure imposed by an FSC Certificate Holder would involve "leaving particular	to make it e	easier
	habitat elements in a stand" owned by independent private landowners, public agencies and others not enrolled	for CHs to	
	in the FSC Program. Again, this seeks to impose requirements on other legal entities that have not voluntarily	determine	if there
7.1 Field	chosen to participate in the FSC scheme. FSC Certificate Holders are not in a position to serve as enforcement	are areas of	
Verification	agents	specified ris	isk Economic

			within their supply	
			chains.	
			Field verification is	
			no longer required	
			in the second draft	
			of the NRA. The	
			second draft of the	
			NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
		Conservation than bullet		
		Suggest changing the bullet	designations has	
		under i. Field Verification to	been reevaluated	
		read: "Shall include a	to make it easier	
		random sampling rate of at	for CHs to	
		least 0.8 times the square	determine if there	
		root of the number of	are areas of	
	Field Verification of control measures will likely not be possible with indirect suppliers where the organization	supplies where the	specified risk	
7.1 Field	has no direct contact with the logger. This will be the case with concentration yards and sawmills that supply the	organization has direct	within their supply	
Verification	organization with logs.	contact with the logger."	chains.	Economic
			The second draft of	
		Provide greater clarification	the NRA aligns with	
	There is a reference to Section 7.7 of FSC-STD-40-005 in the NOTE immediately following 7.1, but the version of	as to what document is	the approved CW	
7.1 Field	FSC-STD-40-005 available from the FSC web site (https://ic.fsc.org/standards.340.htm) does not include a Section	being referenced as "FSC-	standard FSC-STD-	
Verification	7.7.	STD-40-005."	40-005 v3-1	Economic
			Field verification is	
			no longer required	
			in the second draft	
			of the NRA. The	
			second draft of the	
			NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
	Field Verification: The proposal to verify at the field level areas of specified risk to make sure the control		management.	
	measures are being implemented is again, going beyond necessity and beyond capability of a certificate holder.		Additionally, the	
7.1 Field	Again, it is about trying to exert control measures on non FSC lands and that is something that should not be		scale of risk	
Verification	expected or required. It is not something certificate holders can do.		designations has	Economic
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	l		· · · · · · · · · · · · · · · · · · ·

F				
			been reevaluated	
			to make it easier	
			for CHs to	
			determine if there	
			are areas of	
			specified risk	
			within their supply	
			chains. The	
			proposed control	
			measures do not	
			include specific	
			requirements.	
			Field verification is	
			no longer required	
			in the second draft	
			of the NRA. The	
			second draft of the	
			NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
			to make it easier	
			for CHs to	
	Section 7.1 It is not realistic to expect, without sufficient justification, that Appvion could conduct field		determine if there	
			are areas of	
	verification to monitor implementation of Control Measures and their effectiveness. The requirement is overly vague and open to broad and conflicting interpretation.		specified risk	
	vague and open to broad and conflicting interpretation.		within their supply	
	Section 7.1.3 FSC US suggests that a Control Measure imposed by an FSC Certificate Holder would involve		chains. The	
	"leaving particular habitat elements in a stand" owned by independent private landowners, public agencies and		proposed control	
	others not enrolled in the FSC Program. Again, this seeks to impose requirements on other legal entities that		measures do not	
7.1 Field	have not voluntarily chosen to participate in the FSC scheme. Appvion is not in a position to serve as an		include specific	
Verification	enforcement agent in this regard.		requirements.	Economic
verilleation	emorement agent in this regard.		•	LCOHOIIIC
			This requirement	
7.2 Compile	Will this he one report or one for each category and control measure? Describes staff time and add-d-at		has been removed from the second	
7.2 Compile Information	Will this be one report, or one for each category and control measure? Requires staff, time and added cost.			Economic
imormation	Concern about how this might be audited.	Woird request Not sure	draft of the NRA.	Economic
		Weird request. Not sure		
		what the authors mean by	This was and the second	
		implementation rates? Not	This requirement	
7.2.6		sure what to replace it with	has been removed	
7.2 Compile		since I'm not sure what the	from the second	F
Information	I'm not sure what you mean when you say the organization compiles information on implementation rates?	authors are after here.	draft of the NRA.	Economic

			Г
		The Control	
		Measures	
		proposed in the	
		second draft of the	
		NRA include	
		collaborative	
		dialogues to	
		determine a suite	
		of appropriate	
		mitigation	
		activities that are	
		commensurate	
		with their scale of	
		operations. These	
		dialogues are open	
	Controlled Wood Program Evaluation: It is unrealistic to presume that certificate holders and independent	to non-certified	
	private landowners would allow or engage stakeholders to evaluate "processes and outcomes, effectiveness of	landowners that	
7.3 Program	control measures and take steps to address non-conformances." Current staffing of procurement organizations	may be supplying	
Evaluation	would not provide sufficient manpower to complete such a time consuming and onerous task.	to CW CHs.	Economic
		The Control	
		Measures	
		proposed in the	
		second draft of the	
		NRA include	
		collaborative	
		dialogues to	
		determine a suite	
		of appropriate	
		mitigation	
		activities that are	
		commensurate	
		with their scale of	
		operations. These	
		dialogues are open	
		to non-certified	
		landowners that	
7.3 Program		may be supplying	
Evaluation	Direct monitoring requires significant resources.	to CW CHs.	Economic
		The Control	
		Measures	
		proposed in the	
		second draft of the	
		NRA include	
		collaborative	
		dialogues to	
		determine a suite	
		of appropriate	
		mitigation	
		activities that are	
	FSC US inappropriately requires FSC Certificate Holders to monitor and compile information on the	commensurate	
	implementation and effectiveness of Control Measures that would supposedly be agreed to by independent	with their scale of	
	private landowners and contract loggers.	operations. These	
	It is also unrealistic to presume that independent private landowners would allow or engage stakeholders to	dialogues are open	
7.3 Program	evaluate "processes and outcomes, effectiveness of control measures and take steps to address non-	to non-certified	
Evaluation	conformances."	landowners that	Economic
	1 ** * * * ***		

		· · · · · · · · · · · · · · · · · · ·	
		may be suppl	ying
		to CW CHs.	
		The Control	
		Measures	
		proposed in t	he
		second draft	of the
		NRA include	
		collaborative	
		dialogues to	
		determine a s	suite
		of appropriat	
		mitigation	
		activities that	are
		commensura	
		with their sca	
		operations. T	
		dialogues are	
	Controlled Wood Program Evaluation: It is unrealistic to presume that certificate holders and independent	to non-certifi	-
	private landowners would allow or engage stakeholders to evaluate "processes and outcomes, effectiveness of	landowners t	
7.3 Program	control measures and take steps to address non-conformances." Current staffing of procurement organizations	may be suppl	
Evaluation	would not provide sufficient manpower to complete such a time consuming and onerous task.	to CW CHs.	Economic
LvaluatiOII	would not provide sufficient manipower to complete such a time consuming and offerous task.	The Control	LCOHOITIIC
		Measures	to a
		proposed in t	
		second draft	of the
		NRA include	
		collaborative	
		dialogues to	
		determine a s	
		of appropriat	e
		mitigation	
		activities that	
		commensura	
		with their sca	
	FSC US inappropriately requires FSC Certificate Holders to monitor and compile information on the	operations. T	
	implementation and effectiveness of Control Measures that would supposedly be agreed to by independent	dialogues are	open
	private landowners and contract loggers.	to non-certifi	
	It is also unrealistic to presume that independent private landowners would allow or engage stakeholders to	landowners t	hat
7.3 Program	evaluate "processes and outcomes, effectiveness of control measures and take steps to address non-	may be suppl	ying
Evaluation	conformances."	to CW CHs.	Economic
		The Control	
		Measures	
		proposed in t	he
		second draft	of the
		NRA include	
		collaborative	
		dialogues to	
	Monitoring of indirect Supplies: Certificate Holders have no capability to monitor and assess the effectiveness of	determine a s	suite
	prescriptive "Control Measures" using indirect methods. For example, the FSC US proposed Control Measure for	of appropriat	
	Central Florida Pine Flatwoods, is to "consider biodiversity values of xeric uplands when designating landings and	mitigation	
	forwarding areas."	activities that	are
	Such Control Measures are not currently monitored or measured by any procurement organizations, state	commensura	
7.4 Indirect	agencies or others. It is inconceivable that a procurement organization would be able to collect monitoring	with their sca	
purchase	information to determine the proper location of landings and forwarding areas in xeric uplands in the Pine	operations. T	
monitoring	Flatwoods.	dialogues are	
monitoring	i iatwoods.	l ulalogues are	open LCOHOHIIC

			to non-certified	
			landowners that	
			may be supplying	
			to CW CHs.	
			The Control	
			Measures	
			proposed in the	
			second draft of the	
			NRA include	
			collaborative	
			dialogues to	
			determine a suite	
			of appropriate	
			mitigation	
			activities that are	
			commensurate	
			with their scale of	
			operations. These	
			dialogues are open	
	Requirements on intermediary suppliers are a good way to encourage them to sell product to non-FSC markets.		to non-certified	
7.4 Indirect	Stakeholder feedback is from the Stakeholder Portal only?		landowners that	
purchase	State agency inspections are not always readily available to the CH, and will not necessarily align with control		may be supplying	
monitoring	measure compliance.	Strike this requirement.	to CW CHs.	Economic
monitoring	measure compnance.	Strike this requirement.	The Control	Leonomic
		Recommend for this	Measures	
		indicator and all similar		
			proposed in the	
		indicators change language	second draft of the	
		to allow the monitoring	NRA include	
		program to work before	collaborative	
		avoiding certain	dialogues to	
		suppliers/material.	determine a suite	
		Suggestion: "Where	of appropriate	
		monitoring of indirect	mitigation	
		purchases demonstrates	activities that are	
		non-compliance with the	commensurate	
		Company Controlled Wood	with their scale of	
		Program, and the non-	operations. These	
		compliance cannot be	dialogues are open	
		reasonably resolved by	to non-certified	
7.4 Indirect		working with the indirect	landowners that	
purchase		supplier(s), that material is	may be supplying	
monitoring	This language suggests that one non-compliance means an entire source shall be avoided. See comments above	avoided.	to CW CHs.	Economic
			The Control	
			Measures	
			proposed in the	
			second draft of the	
			NRA include	
			collaborative	
			dialogues to	
			determine a suite	
			of appropriate	
	Attempts to implement field inspections becomes increasing difficult as one moves down the supply chain.		mitigation	
7.4 Indirect	Private landowners may not give land access permission to FSC field verifiers, and they are not legally bound to		activities that are	
purchase	give such permission. It is unrealistic for landowners to cooperate with a certification standard they are not		commensurate	
•				Economic
monitoring	actively participating in.		with their scale of	Economic

			operations. These	
			dialogues are open	
			to non-certified	
			landowners that	
			may be supplying	
			to CW CHs.	
			The Control	
			Measures	
			proposed in the	
			second draft of the	
			NRA include	
			collaborative	
			dialogues to	
			determine a suite	
			of appropriate	
			mitigation	
			activities that are	
			commensurate	
			with their scale of	
			operations. These	
			dialogues are open	
	This is unachievable, for type 1 indirect purchases, and particularly for type 2 indirect & by-product purchases,		to non-certified	
7.4 Indirect	with regard to numerous of the control measures. There is no existing program in place that encompasses the		landowners that	
purchase	requirements of the NRA. It would be both cost prohibitive and illegal from many aspects to implement such a		may be supplying	
monitoring	program through either public or private efforts.		to CW CHs.	Economic
monitoring	program through either public of private errors.		The Control	LCOHOITIC
		Allan fau flanikilitania	Measures	
		Allow for flexibility in	proposed in the	
		monitoring and add notes or	second draft of the	
		highlights that acknowledge	NRA include	
		that monitoring is allowed to	collaborative	
		happen after the fact with	dialogues to	
		some sort of feedback loop.	determine a suite	
		Should issues arise with	of appropriate	
		control measures that add to	mitigation	
		the current wording where	activities that are	
		material "is avoided" to	commensurate	
		"areas where monitoring	with their scale of	
		reveals that control	operations. These	
		measures are not met the	dialogues are open	
		company takes action to	to non-certified	
7.4 Indirect	This section allows for flexibility needed within the system to manage and monitor indirect supplies. Without a	restrict those suppliers or	landowners that	
purchase	monitoring principle there is no mechanism to develop confidence within a DDS model. It is important to note	avoid material from that	may be supplying	
monitoring	that all monitoring of outcomes has to happen after the fact.	supply area."	to CW CHs.	Economic
			The Control	
			Measures	
	For many large forest products companies, "indirect sourcing" that isn't "type 1" makes up a significant portion of		proposed in the	
	their supply chain. It is therefore important to recognize that "indirect sourcing" must be effectively addressed		second draft of the	
	in the CW system to ensure system integrity and meet the environmental performance expected by the FSC.		NRA include	
	While this is the type of procurement that gives the certificate holder limited leverage, there still must be clear		collaborative	
	control measures designed to reduce risk. It is problematic that the system will rely only on indirect monitoring.		dialogues to	
	More effort needs to be spent looking at creative ways to ascertain compliance with controlled wood		determine a suite	
7.4 Indirect	performance outcomes in this supply chain. And if these types of control measures are not able to be fully		of appropriate	
purchase	developed to achieve their goals, it may become necessary to rethink the direct and indirect supply		mitigation	
monitoring	classifications.		activities that are	Environmental

			commensurate	
			with their scale of	
			operations. These	
			dialogues are open	
			to non-certified	
			landowners that	
			may be supplying	
			to CW CHs. The	
			second draft of the	
			NRA does not	
			differentiate	
			between direct and	
			indirect suppliers.	
	7.4 states "For indirect aurabases supplier compliance shall be monitored via monitoring by intermedian.		This term is not	
7.41	7.4 states "For indirect purchases, supplier compliance shall be monitored via monitoring by intermediary			
7.4 Indirect	suppliers,"		included in the	
purchase	The term "intermediary suppliers is not defined and is unclear. Is FSC-US suggesting that certificate holders	Remove the term	second draft of the	
monitoring	require those outside of the certification process be required to participate in monitoring activities?	"intermediary suppliers".	NRA.	Economic
			The Control	
			Measures	
			proposed in the	
			second draft of the	
			NRA include	
			collaborative	
			dialogues to	
			determine a suite	
			of appropriate	
			mitigation	
			activities that are	
			commensurate	
			with their scale of	
			operations. These	
			dialogues are open	
			to non-certified	
			landowners that	
			may be supplying	
			to CW CHs. The	
	We assume the reference was intended for requirement 7.4, not 7.3 as specified. In-field monitoring of indirect		second draft of the	
	purchases is very challenging for wood procurement operations. Attempts to implement in-field inspection		NRA does not	
7.4 Indirect	become increasingly difficult the further one moves back along the supply chain. Many private owners of land		differentiate	
purchase	will not allow access and inspections. Direct suppliers are reluctant to introduce wood-consuming mills to their		between direct and	
•	full supply chain.			Economic
monitoring	тин зирру спать.		indirect suppliers.	Economic
			The second draft of	
			the NRA contains	
			control measures	
			where the exact	
			mitigation actions	
			will be determined	
			during a	
			collaborative	
			dialogue at a	
			regional meeting.	
	Monitoring for implementation rates of control measures on direct purchases is possible. Monitoring		Therefore,	
	effectiveness on independent private ownership will not be possible given the sensitivity of information.		monitoring is not	
			-	i l
7.4 Question for	Indirect monitoring will need to rely on the current level of available information collected by governmental and		explicitly included	

		1		
			The second draft of	
			the NRA contains	
			control measures	
			where the exact	
			mitigation actions	
			will be determined	
			during a	
			collaborative	
			dialogue at a	
			regional meeting.	
			Therefore,	
	Any systematic monitoring of Type 2 indirect suppliers will be costly and ineffective. Since there is no existing	Focus monitoring on areas	monitoring is not	
7.4 Question for	data provided demonstrating extensive noncompliance with any of the categories in the US, limit data collection	and categories when issues	explicitly included	
Consultation	on direct and type 1 indirect suppliers, and minimize requirements.	become apparent.	in the second draft.	Economic
	The second of th	A better system would be to		
		set up larger scale		
		monitoring and review of		
		the NRA assessments.	The second draft of	
		Certainly, expect the CW	the NRA contains	
		purchaser to maintain some	control measures	
		level of review and due	where the exact	
		diligence BUT also provide a	mitigation actions	
			_	
		FSC-US e-library that covers	will be determined	
		new NGO reports, review of	during a	
		stakeholder concerns, peer-	collaborative	
		reviewed studies etc. These	dialogue at a	
		could be utilized to update	regional meeting.	
		the NRA and to assess large-	Therefore,	
		scale compliance – which I	monitoring is not	
7.4 Question for		think is what we are really	explicitly included	
Consultation	Monitoring indirect purchases	after right?	in the second draft.	Economic
		A better system would be to		
		set up larger scale		
		monitoring and review of		
		the NRA assessments.	The second draft of	
		Certainly, expect the CW	the NRA contains	
		purchaser to maintain some	control measures	
		level of review and due	where the exact	
		diligence BUT also provide a	mitigation actions	
		FSC-US e-library that covers	will be determined	
		new NGO reports, review of	during a	
		stakeholder concerns, peer-	collaborative	
		reviewed studies etc. These	dialogue at a	
		could be utilized to update	regional meeting.	
		the NRA and to assess large-	Therefore,	
		scale compliance – which I	monitoring is not	
7.4 Question for		think is what we are really	explicitly included	
Consultation	Monitoring indirect purchases	after right?	in the second draft.	Economic
			The second draft of	
			the NRA contains	
	We assume the reference was intended for requirement 7.4, not 7.3 as specified. In-field monitoring of indirect		control measures	
	purchases is very challenging for source mills. Attempts to implement in-field inspection become increasingly		where the exact	
	difficult the further one moves back along the supply chain. Many private owners of land will not allow such		mitigation actions	
7.4 Question for	inspections. Direct suppliers are reluctant to allow customers to evaluate their full supply chain due to protection		will be determined	
Consultation	of business interests and confidential business information concerns.		during a	Economic
Consultation	ן טו שעמוופסט וווגפופטנס מווע כטווועפווגומו שעמוופסט ווווטווומגוטון בטווגפוווט.	1	uuriiiga	LCUITUITIC

			collaborative	
			dialogue at a	
			regional meeting.	
			Therefore,	
			monitoring is not	
			explicitly included	
			in the second draft.	
			The second draft of	
			the NRA contains	
			control measures	
			where the exact	
			mitigation actions	
			will be determined	
			during a	
			collaborative	
			dialogue at a	
	We assume the reference was intended for requirement 7.4, nor 7.3 as specified. In-field monitoring of indirect		regional meeting.	
	purchases is very challenging for wood procurement operations. Attempts to implement in-field inspection		Therefore,	
	become increasingly difficult the further one moves back along the supply chain. Many private owners of land		monitoring is not	
7.4 Question for	will not allow access and inspections. Direct suppliers are reluctant to introduce wood-consuming mills to their		explicitly included	
Consultation	full supply chain.		in the second draft.	Economic
			The second draft of	
			the NRA contains	
			control measures	
			where the exact	
			mitigation actions	
			will be determined	
			during a	
			collaborative	
			dialogue at a	
			regional meeting.	
			Therefore,	
			monitoring is not	
7.4 Question for	The most appropriate method for monitoring indirect purchases is indirect methods such as state agency		explicitly included	
Consultation	inspections.		in the second draft.	Economic
Consultation	inspections.			LCOHOITIC
			The second draft of	
			the NRA contains	
			control measures	
			where the exact	
			mitigation actions	
			will be determined	
			during a	
			collaborative	
			dialogue at a	
			regional meeting.	
	Monitoring for implementation rates of control measures on direct purchases is possible. Monitoring		Therefore,	
	effectiveness on independent private ownership will not be possible given the sensitivity of information.		monitoring is not	
7.4 Question for	Indirect monitoring will need to rely on the current level of available information collected by governmental and		explicitly included	
Consultation	state agency data, which will not address control measure elements.		in the second draft.	Economic
		Plenty of compliance surveys	The second draft of	
		and notice of violation	the NRA contains	
		information is available to	control measures	
7.4 Question for		adequately monitor	where the exact	
Consultation	The proposed monitoring requirements are sufficient.	suppliers.	mitigation actions	Economic
22.1341441011	1e b. obesese	00pp010.		

		1	90 by data	
			will be determined	
			during a	
			collaborative	
			dialogue at a	
			regional meeting.	
			Therefore,	
			monitoring is not	
			explicitly included	
			in the second draft.	
			The Glossary in the	
	The classes should be aligned with FM definitions. FSC is not many consists arganizations. The motions and		second draft of the	
	The glossary should be aligned with FM definitions. FSC is not many separate organizations. The motions and			
	GA vote has always been to align standards and remove additional steps. The FSCUSNRA should be proactive by		NRA aligns with the	
	not reinventing the wheel with new terminology that will create broad interpretations and vast differences in		FSC US FM	
	implementations. Auditors and CB representatives and certificate holders should not have to remember if it is	Align standard terminology	standard and FSC-	
VIII. Glossary	the controlled wood plantation wording or the FSC plantation wording or what the public thinks.	with the FM standard.	STD-40-005 v3	Economic
		Reorganize the NRA in a user		
		friendly format, include the		
		glossary at the beginning of		
		CW NRA similar to the		
		format of FSC standard		
		documents.	The second draft of	
	Consultation of the consult double consists of the ESC US COM National Dist. According to not constituted by	documents.		
	Overall structure of the current draft version of the FSC US CW National Risk Assessment is not user friendly.		the NRA uses the	
		Use consistent language	FSC International	
	Byproducts in NRA, co-products in 40-005	and definitions in the NRA	template and no	
	Byproducts also include reclaimed material in the NRA – how does one draw the line between reclaimed	and the standard. Co-	longer uses the	
VIII. Glossary	material and byproducts?	products.	term byproduct.	Economic
		NOTE Avoidance of		
		unacceptable sources is not		
		an acceptable control		
		measure unless all options	Thank you for your	
		to engage landowner,	comment. The	
		supplier and/or governance	note remains in	
		to mitigate the risk has been	the second draft of	
VIII Classon	Note under "control maggins" should not engaging a visidance but without angagement	=		Faanamia
VIII. Glossary	Note under "control measure" should not encourage avoidance but rather engagement.	exhausted.	the NRA.	Economic
	Does not align with other standards terminology used.			
	FSC has used co-product in the past where the material came from a process of primary manufacture as an			
	additional outcome. This wording note now includes sawdust from sawmills and sawdust from furniture			
	manufacturers.	Consider clarification within	The term	
		NRA. The current draft 05	byproduct is no	
	In the FSC CoC standard, research and status of Preconsumer (furniture manufacturer) sawdust has been	standard calls for greater	longer used in the	
Definition,	requested by some cert holders. It is unknown where this will go. Preconsumer also falls under the 007	requirements on	second draft of the	
Byproduct	standard.	residuals/byproducts.	NRA.	Economic
		By all means, please keep		
		sawmill residues included as	The term	
		byproducts. This will attract	byproduct is no	
		**		
Definition	The inclusion of all countil positives as a hyperduct values the administrative hypersucks.	many more participants to	longer used in the	
Definition,	The inclusion of all sawmill residues as a byproduct reduces the administrative burden and charge to	FSC with sensible changes	second draft of the	
Byproduct	uncomfortably get elbow deep in a residual supplier's business.	like this.	NRA.	Economic
		Suggest Type 1 read: The		
		Organization owns the	The second draft of	
		timber or rights to harvest	the NRA does not	
		the timber, has a forester	differentiate	
Definition, Direct		directly involved in the	between direct and	
Purchase	Suggest strengthening the definition of both type one and type two.	harvest and harvest the	indirect suppliers.	Economic
ו עונוומטכ	Juggest strengtherning the definition of both type one and type two.	man vest and hal vest the	munect suppliers.	LCOHOITIC

			T	
		timber with either a		
		company or contract logging		
		crew.		
		Suggest Type 2 read: The		
		Organization has a direct		
		contractual relationship with		
		the landowner (FMU) and		
		has the capacity through		
		that contractual relationship		
		•		
		to directly influence		
		activities at the forest		
		management unit (FMU)		
		level.		
		Direct Purchases, Type 2:		
			The second duelt of	
		Exclude purchases from	The second draft of	
1		REITs, TIMOS and	the NRA does not	
1	Defining Type 2 Direct Purchases as such will increase the admin burden 10 fold for procurement slim	landowners over 10,000 acs	differentiate	
Definition, Direct	organizations that do business with REITS, TIMOs & large landowners. Little ability to influence the harvesting	holdings that hold any FM	between direct and	
Purchase	methods exists in these contractual arrangements.	certification.	indirect suppliers.	Economic
			The second draft of	.
1			the NRA does not	
	It's unclear what type of indirect purchase it is considered if a mill or distribution facility purchases controlled		differentiate	
Definition,	material (lumber) from another facility – is it Type 3? If so, does this mean that there are no requirements for		between direct and	
Indirect Purchase	supplier agreements?	See question – please clarify.	indirect suppliers.	Economic
			The second draft of	
			the NRA does not	
			differentiate	
D . C . W	his affect has feel as a feet and a second of the second o			
Definition,	It is difficult to find any reference or control measures for type 2 purchases. If they are going to be separated		between direct and	
Indirect Purchase	out then they need to be explicitly addressed in the body of the document for each type of specified risk.		indirect suppliers.	Economic
		Suggest adding a Type 1A to		
		read: The Organization has		
		a contractual relationship		
		with the landowner to		
		purchase logs but has no		
		_ ·		
		capacity to directly influence		
1		activities at the forest	The second draft of	
1		management unit (FMU)	the NRA does not	
1		level. The landowner may	differentiate	
Definition,		use a contract logger to	between direct and	
Indirect Purchase	Suggest adding another level to the definition of type one.	deliver wood to the mill.	indirect suppliers.	Economic
	and the state of t	Add minimum size for each		
1		old growth type.		
1		old growth type.		
1				
1		Type I – if a stand was		
1		managed via burning but not		
1		harvesting, is it still		
1		considered Type I? This		
1		definition just includes		
1			The definition of	
1		commercial timber harvest.	The definition of	
			Old Growth	
	These definitions need further refinement. They should include a minimum scale (i.e. minimum x acres) –	Last phrase – it should be	remains as it was	
Definition, Old	otherwise it's too difficult to assess (does a 1 acre patch of 3 unharvest OG trees = Type I OG)? Let's not leave	"coarse woody debris" not	in the first draft of	
Growth	this up to auditor interpretation – that will lead to vast inconsistencies.	"course woody debris".	the NRA.	Economic
	I		1	,

	The definition of		T	
	The definition of			
	Old Growth			
	remains as it was			
	in the first draft of		It will be exceedingly difficult for suppliers and non-FSC-certified landowners to identify such areas on the	Definition, Old
Economic	the NRA.		ground, particularly at such a small threshold of 3 acres.	Growth
		This is a messy definition –		
		please add minimum size of		
	The definition of	what can be considered		
	Primary Forest	primary forest and examples		
	remains as it was	of non old growth primary		
	in the first draft of	forest to assist with	Ugh. Please advise on (1) scale of what can be considered a primary forest (i.e. minimum size); and 2) examples	Definition,
Economic	the NRA.	assessment.	of non old growth primary forests to help with assessment.	Primary forest
.conomic	The Glossary in the	assessificite.	Types of Risk: The FSC Controlled Wood Standard (40-005) is based upon an evaluation of "significant risk." The	T Tilliary Torest
			FSC US National Risk Assessment has modified and expanded this definition to now imply "that there is a certain	
	second draft of the		1	D. C. W.
	NRA aligns with		risk that forest products from unacceptable sources may be sourced." The new definition is an unprecedented	Definition,
Economic	FSC-STD-40-005 v3		and significant expansion over, and departure from, the current definitions in the Controlled Wood Standard.	Specified Risk
	The Glossary in the		Types of Risk: The FSC Controlled Wood Standard (40-005) is based upon an evaluation of "significant risk." The	
	second draft of the		FSC US National Risk Assessment has modified and expanded this definition to now imply "that there is a certain	
	NRA aligns with		risk that forest products from unacceptable sources may be sourced." The new definition is an unprecedented	Definition,
Economic	FSC-STD-40-005 v3		and significant expansion over, and departure from, the current definitions in the Controlled Wood Standard.	Specified Risk
	The Glossary in the			
	second draft of the			
	NRA aligns with	Clarify the meaning of the	Definition of "specified risk" on pg 9: The use of the word "certain" in the phrase "that there is a certain	Definition,
Economic	FSC-STD-40-005 v3	phrase "certain risk".	risk" is ambiguous. Does it mean "inevitable" or does it mean "particular"? It is likely it means the latter.	Specified Risk
		Prior verbiage should be re-		
		instated in the standard:		
		The certificate holder can		
		demonstrate district of		
		origin to the forest level		
	The second draft of	through any one or a		
	the NRA aligns with	combination of the following		
	the approved CW	options:		
	standard FSC-STD-	Certificate holder's have	Documenting the Supply Area : The three options suggested are not inclusive of the FSC Directive: "ADVICE 40-	
	40-005 v3-1, so	invested considerable time	005-04 What kind of documentation and control is required to verify the geographical district of origin?" This	
	this requirement	and resources to meet the	current Advice suggests a "Plausibility Test" of the information that is collected. This analysis is currently being	
	has been removed	earlier verbiage. It should be	accepted as objective evidence of the supply area, but is not mentioned in the FSC US National Risk Assessment.	IX. Annex A,
Economic	from the NRA	maintained.	The NRA should be consistent with FSC Directives addressing the FSC Controlled Wood Standard.	Supply Area
-		I choose Option 1 BUT		
		purchaser should only be		
		required to show samples of		
		-		
		_		
		uocuments		
		Onting 2 would be seen		
		·		
	_	. ,		
	the approved CW			
	standard FSC-STD-	specified risk). Are all	the source documents	
	40-005 v3-1, so	options going to be included		
		or are you asking us to	Option 3 would be another nice option to include – but may not work with species with broad ranges (i.e. will	
	this requirement	of are you asking as to		
	this requirement has been removed	choose our preferred	likely overlap some areas of specified risk). Are all options going to be included or are you asking us to choose	IX. Annex A,
	standard FSC-STD-	proof of origin – not maintain all the source documents Option 3 would be another nice option to include – but may not work with species with broad ranges (i.e. will likely overlap some areas of specified risk). Are all options going to be included		

		1		ı
			The second draft of	
			the NRA aligns with	
			the approved CW	
			standard FSC-STD-	
			40-005 v3-1, so	
	In the gratit has been acceptable and contaminate or acceptance of the three patients. This	Allanda and and and	-	
	In the past it has been acceptable and customary to use any one or a combination of the three options. This	Allow for any one or a	this requirement	
IX. Annex A,	should be continued in the future. This is of particular importance in documenting the supply areas for type 2	combination of the options	has been removed	
Supply Area	indirect & by-product sources.	to be acceptable.	from the NRA	Economic
			The second draft of	
			the NRA aligns with	
			the approved CW	
			standard FSC-STD-	
	Decimantation of cupply area for by product, third party fibor, coun lumber from small mills is not relevant with		40-005 v3-1, so	
	Documentation of supply area for by-product, third party fiber, sawn lumber from small mills is not relevant with		•	
	unmapped specified risk. If I get a declaration and conduct a logical supply analysis for a several county region,		this requirement	
IX. Annex A,	what do I compare it to? The PFTs are very broadly defined and depending on the interpretation of what they		has been removed	
Supply Area	are could be anywhere or nowhere in the supply area.		from the NRA	Economic
			The second draft of	
			the NRA aligns with	
			the approved CW	
			standard FSC-STD-	
			40-005 v3-1, so	
			this requirement	
IX. Annex A,	[Option 1, d] If a supplier does not want to share his records with an organization, it's doubtful they will open up	Our recommendation is to	has been removed	
Supply Area	to a CB. Also, it costs organizations to use CBs.	drop this requirement.	from the NRA	Economic
			The second draft of	
			the NRA aligns with	
			the approved CW	
			standard FSC-STD-	
		Describe a section of the office of the original to the origin		
		Provide greater clarification	40-005 v3-1, so	
	There is a reference to a specific note in FSC-STD-40-005 that begins, "NOTE: A declaration from the supplier	as to what document is	this requirement	
IX. Annex A,	may" However, the version of FSC-STD-40-005 available from the FSC web site	being referenced as "FSC-	has been removed	
Supply Area	(https://ic.fsc.org/standards.340.htm) does not include a note with this text.	STD-40-005."	from the NRA	Economic
			The second draft of	
			the NRA aligns with	
			the approved CW	
			standard FSC-STD-	
			40-005 v3-1, so	
		Continue to maintain the 3	this requirement	
IX. Annex A,		options for documenting	has been removed	
Supply Area	Requirements for documenting a supply area must be broad enough and provide flexibility (options 1-3)	supply area.	from the NRA	Economic
		Option 2 is similar to the		
		current US/Canadian	The second draft of	
		guidance for DOO and we	the NRA aligns with	
		=	_	
		feel the sub-options would	the approved CW	
		be better presented in a	standard FSC-STD-	
	Option 2 for documenting the supply area on page 14 is not clear in the format presented.	flow chart.	40-005 v3-1, so	
			this requirement	
IX. Annex A,	Region table: The resolution of this graphic is low and may not display well on black and white printed	Region table: Enhance	has been removed	
Supply Area	documents Enhance resolution	resolution	from the NRA	Economic
	Following are comments offered on behalf of Resource Management Service, LLC relative to the FSC US			20011011110
	Controlled Wood National Risk Assessment (NRA). Most of our comments area specific to Categories 3 High			
	Conservation Values and 4 Conversion.			
			Thank you for your	
General	Resource Management Service, LLC (RMS), a financial investment and forest management company		comment	Economic

	Leader to the State of the Stat			
	headquartered in Birmingham, Alabama, has management authority for over 2.5 million acres of privately-			
	owned forest lands in nine states in the southern United States. These forestlands are managed by professional			
	foresters and wildlife biologists for multiple forest values, including pulpwood and solid wood products, outdoor-			
	based recreational activity, and environmental values including clean water, clean air, and wildlife habitat for a			
	wide range of species. All forest lands managed by RMS in the United States are third party certified to the			
	Sustainable Forestry Initiative® (SFI) Standard, a rigorous certification scheme that demonstrates our			
	commitment to holistic forest management. RMS is a major wood supplier to numerous manufacturing facilities			
	who are certified to the Forest Stewardship Council (FSC) Chain of Custody (COC) Standard.			
	Just wanted to make a comment thanking the CWWG and the technical staff at FSC-US for putting this risk			
	assessment together. Very thoughtful review and appreciate all the time and effort that went into this	Thank	you for your	
General	document.	comme	ent	Economic
	Please accept the following comments from Oregon Wild regarding the proposed FSC United States Controlled			
	Wood National Risk Assessment (US NRA). Oregon Wild represents approximately 10,000 members and			
	supporters who share our mission to protect and restore Oregon's wildlands, wildlife and waters as an enduring	Thank	you for your	
General	legacy.	comme	•	Environmental
General	Hancock Timber Resource Group (HTRG) is a global company with responsibility for working forest investments	Comme	.110	Liivii Oiliiicittai
	on behalf of institutional investors. HTRG has certified over 2.8 million acres to a variety of FSC National			
	Standards, including approximately 300,000 acres in the United States. In total, we manage over 6.2 million acres			
	of forest investments around the globe. As such, HTRG is a major supplier to numerous manufacturing facilities			
	who are certified to the Forest Stewardship Council (FSC) Chain of Custody (CoC) Standard. It is in the context of			
	our global position in the forest sector supply chain that we offer the following comments on the Draft FSC-US			
	Controlled Wood (CW) National Risk Assessment (NRA).			
	(
	Finally, we recommend that FSC expand the current CW development process to include adequate			
	representation of all of the landowners that would be materially affected by the standard. At a minimum, this	,		
	should include strong representation from economic interests in the United States. The United States has proven		you for your	
	to be a low-risk operating region according to risk assessments developed by FSC members. To reverse these	comme	ents.	
	findings through development of a NRA that essentially excluded US landowners and relied on more expert	Opport	tunities to	
	opinion than facts is a failed process and one that needs to be fixed before considering any aspect of this	engage	with non-	
	consultation final.	certifie	:d	
		landow	ners has	
	As a FSC certificate holder and one of the largest managers of private forests in the US, we trust you will take our		en built into	
	comments seriously. We did not spend time answering specific questions as presented in the draft NRA because		laborative	
	we felt the topics we raise in this letter are larger than the individual questions and require your attention first.		ies that are	
	Should our concerns and the concerns of our colleagues be addressed and presented in a version 2.0 of the NRA,	part of	the control	
General	we will respond with more specificity. Thank you.	measu	res.	Economic
		The sec	cond draft of	
	Experience from many risk assessments conducted by FSC-certified companies and approved by FSC Certification	the NR	A includes a	
	Bodies showed limited to no risk to high conservation value forests (HCVFs) in the United States. The proposed	much g	greater level	
	draft NRA should reference this fact, or at least provide an explanation of why it is no longer sufficient.	I	umentation	
	The majority of wood harvested in the United States is harvested by experienced, trained loggers, and is	and rat		
	supplied to large mills. The current system continues to be under pressure from customers to reduce costs,		ed for the	
	which has been done in large part by separating ownership of lands from ownership of mills and by moving		signations,	
	control of harvesting away from mills and further down various supply chains. Changes to this "cost-reducing"	includi	•	
	and fairly efficient fiber supply system will increase costs. As yet, there is little evidence of willingness by users of		ment of	
	FSC-certified material to pay more for certified or controlled wood to cover any significant portion of the cost of	whether	er or not the	
	certification. Many suppliers of wood fiber, and some wood consuming mills, are expressing concerns about	HCV is	threatened	
	more rules and processes driving up costs, and appear ready to abandon FSC-programs.	by fore	st	
	Complex rules and processes stemming from controlled wood requirements will fall on portions of the supply	manag		
	chain least able to adapt to changes. While many fiber harvesting operations working on uncertified lands are	_	tunities to	
	, , , , , , , , , , , , , , , , , , , ,			
	also quite sophisticated, they are accustomed to a business environment with fewer rules and processes and		with non-	
			ام	
	they require more flexibility in their operations due to the "spot" nature of their wood orders and the smaller	certifie		
	they require more flexibility in their operations due to the "spot" nature of their wood orders and the smaller size of the tracts and land ownerships from which they typically harvest. • FSC US inappropriately proposes that wood procurement organizations "require" the implementation of	landow	vners has een built into	

	"Control Measures" on private landowners that have not chosen to voluntarily participate in the FSC scheme,	the collab	orativo	
	thereby extending FSC's vision of forestry beyond willing participants.	dialogues		
		part of th measures		
		FSC US ha		
		to make t second di		
		NRA work		
		FSC Certif		
		Holders.		
		second di		
		NRA inclu		
		much gre		
	1. We are concerned that, without sufficient justification or rationale, FSC US proposes to significantly expand	of docum		
	the scope of the FSC Controlled Wood Standard to include broad geographic areas of "Specified Risk." It is not	and ratio		
	credible or practical that FSC US can change the Controlled Wood rules, without a thorough analysis and	provided		
	justification of the need for the change. All of our assessments, as well as other FSC Risk Assessments that we	risk desig		
	are aware of, have concluded "Low Risk" and FSC Certification Bodies and FSC International have approved those	including		
	assessments.	assessme		
	2. We have a significant concern that FSC has continuously changed, and made more restrictive, the rules and		or not the	
	requirements for its Chain of Custody and Controlled Wood Standards. This continual ratcheting down of the	HCV is the		
	rules to make them more prescriptive, costly and burdensome, without adequate explanation of the benefits to	by forest		
	the forest resource and the industry is not acceptable.	managem		
	3. The CNRA was not released by FSC-International until March 2 and was not distributed by FSC-US until March	scale of ri		
	4th, leaving only 11 days for stakeholders to review and understand the CNRA and its relationship to the FSC-US	designation		
	NRA. Commenters need sufficient time to adequately review Risk Category 1, 2, and 5 of the CNRA, which will	also been		
	be part of the comprehensive NRA that eventually will be finalized, to understand the full burden imposed by all	to assist o		
	risk categories. In addition, conclusions reached in the CNRA, such as Risk Category 2 – Traditional & Civil Rights	holders in		
	assessments will require revision by FSC-US, limiting the effectiveness of comments by stakeholders. The second	determin		
	comment period for the draft NRA should be at least 60 days to allow for a thorough analysis of both the draft	whether	•	
	Centralized NRA (CNRA) and updated NRA	they area		
	4. Our experience to date has demonstrated that the U.S. forest and paper industry has a very good record of	specified		
	training loggers, complying with applicable laws and regulations, implementing voluntary BMPs, protecting	within the		
	Forests of Exceptional Conservation Value and providing biodiversity at the stand and landscape levels. BMP	areas. The	e Control	
	compliance is reported by state forestry agencies to be in the 95% range and very close to 100% of the loggers	Measures	s do not	
	have received training through collective SFI Implementation Committee programs. All current risk assessments	identify s	pecific	
	and analysis support the overall conclusion that there is a very Low to Negligible Risk of sourcing controversial	mitigation	-	
	wood. In spite of this exemplary record, FSC proposes unjustified additional Control Measures that will carry	rather a s	uite of	
	substantial costs.	actions w		
	5. FSC US has not conducted or discussed any economic analysis of the costs and barriers of implementing the	identified	l through	
	proposed "Control Measures" and other additional requirements. The costs to our organization are likely to be	a collabor		
	substantial and have not been justified on an objective risk basis by FSC US. We anticipate a substantial increase	dialogue a	at a	
	in the costs of the following activities:	regional r	meeting.	
	a. analyzing the new Specified Risk areas,	The collab	borative	
	b. developing and implementing Control Measures,	dialogues	will be	
	c. conducting consultations with outside experts,	open to n	ion-	
	d. conducting staff and contractor training of hundreds of suppliers,	certified		
	e. monitoring the effectiveness of the control measures across thousands of acres of forest land owned by other		ers so that	
	private landowners, and	they may		
General	f. paying the costs of auditors to conduct a sub-sample of forest tracts not owned by our Company.	with the p	process.	Economic
	6. The wood harvested in our wood supply areas is harvested by experienced and trained loggers, much of it			
	through open market contracts where we have no contract with the owners of the forests. The current system			
	has been under pressure from customers to reduce costs, which has been done in large part by separating			
	ownership of lands from ownership of mills and by moving control of harvesting away from mills and further			
	down the supply chain. Changes proposed by FSC to this "cost-reducing" and fairly efficient fiber supply system			

and increase the acreage of FSC Certified Forests, of which there are very few, if any, within the supply regions of our manufacturing facilities.		
and increase the acreage of FSC Certified Forests, of which there are very few, if any, within the supply regions of		
	İ	
would be better served to find ways to make FSC certification more reasonable, cost-effective and affordable		
Measures, effectively drive FSC Certificate Holders, suppliers and landowners away from the FSC Program. FSC		
14. The Company is concerned that FSC US will, by its proposed US National Risk Assessment and Control		
must be removed from the document.		
may change stand age class and structure, it does not diminish biodiversity. Speculative and personal judgments		
that harvesting of bottomland hardwood forests >80 years old diminishes biodiversity values. While harvesting		
level management. A further concern is that one of the Control Measures is based upon the invalid assumption		
landowners are not FSC Controlled Wood certificate holders and have little to no capacity to effect landscape		
maintain the distribution and extent of mid-seral Jack Pine across the landscape." FSC fails to recognize that		
Holders. One control measure suggests that land owners "conduct harvest operations in a manner sufficient to		
13. The NRA suggests control measures at the "landscape" level that are not implementable by Certificate		
of the regional experts who selected areas for further protection or methods and criteria that were used.		
through consultation with unnamed "regional experts. The NRA presents no information about the qualifications		
12. The Company is concerned that the NRA is overly value driven and based in part on stakeholder inputs and		
effectiveness of measures.		
stand-level species" are not implementable and would be next to impossible to monitor and evaluate		
the Control Measures in priority habitats. Vague Control Measures such as "maintain structural diversity and		
11. The Company is concerned that the NRA provides no description of which rare species are to be addressed by		
resources.		
logging" may result in undesirable regeneration and that "Alabama BMPs" may not adequately protect aquatic		
with respect to "threats." The NRA presents no technical basis for perceptions that, for example, "shovel		
on good science and research information. Terms such as "potential" and "may impact" appear numerous times		
10. The Company is concerned that the National Risk Assessment is based more on perception and values than		
enforce Control Measures on independent businesses that go beyond current laws and regulations.		
take other proactive measures, it is not reasonable to propose that procurement organizations require and		
landowners and loggers to comply with laws and regulations, implement BMPs, become SFI Logger Trained and		
that have not voluntarily chosen to participate in the FSC scheme. While the Company takes steps to influence		
9. The Company is not in a position to enforce Supplier Agreements with independent landowners and loggers		
unacceptable aspect of the FSC National Risk Assessment.		
voluntarily participate in the FSC scheme, thereby extending FSC's reach beyond willing participants. This is an		
Agreements" and implementation of "Control Measures" on private landowners that have not chosen to		
8. FSC US inappropriately proposes that wood procurement organizations "require" the signing of "Supplier		
they typically rely on.		
their operations due to the "spot" nature of their wood orders and the smaller size of the tracts and ownerships		
certified lands are not accustomed or capable of absorbing additional costs and they require more flexibility in		
chain least able to adapt to changes and absorb additional costs. Fiber harvesting operations working on non-		
7. Complex rules and processes stemming from controlled wood requirements will fall on portions of the supply		
burdens.		
expressing significant concerns about more rules and processes driving up costs and increasing regulatory		
certified or controlled wood to cover any portion of the cost of certification. Many suppliers of wood fiber are		
will increase costs. As yet there is little evidence of willingness by users of FSC-certified material to pay more for		
will increase costs. As yet there is little evidence of willingness by users of ESC cortified material to now more for		

	that FSC certified companies will need to meet to sell FSC products. I was expecting a risk assessment much the		workable for FSC	
	same as the company ones that we have today only being competed nationally, and addressing any issues that		Certificate Holders.	
	FSC is concerned about in a cost sensitive way. This new process will but a lot of extra work and cost on			
	companies for little value in a low risk state like Maine. I see value in going to these extremes in some parts of			
	the world, but not North America. Field verifications, supplier agreements, due diligence systems and monitoring			
	will all require substantial effort and dollars.			
	·			
	This process is using a sledge hammer to drive a finishing nail. I think FSC US owes it to FSC certified companies			
	to take a second look at this to come up with a better way to address real risks cost effectively.			
	Conduct a proper risk assessment at the National level that identifies areas of low and specified risk. Leave it to			
	the FSC certified companies to figure out the best way to address the risk in their fibre supply area and then			
	leave it to the CBs to decide if the Controlled Wood Standard is met or not. If not CARs would be issued and			
	improvements would be made. This will result in the least cost, most efficient, most value added solution. I			
	would be happy to discuss these concerns further with FSC US.			
			FSC US is working	
			to engage with	
			affected and non-	
			certified	
			landowners during	
			the second	
			consultation.	
			Supplier	
			agreements and	
			information from	
			sub-suppliers are	
			not required. The	
			risk mitigation	
			approach avoids	
			wood exclusion by	
		In the U.S., existing federal &	ensuring that	
		state laws & regulations are	certificate holders	
		<u> </u>		
		sufficient to determine,	have options with	
		designate, & protect priority	each making their	
	Many of the control measures are general prescriptions or simply statements or suggestions that would or may	T&E species & priority	own decision	
	benefit a particular species or priority habitat. Many are subjective. While flexibility is desirable, the NRA should	habitats. The U.S. should	based on their	
	be more specific as to what will be considered acceptable in addressing specified risk.	simply be designated as low	situation.	
		risk.	Additionally, FSC	
	It is not feasible or achievable and is unrealistic to expect that many of the control measures for priority T&E		has had the revised	
	species & habitats, priority forest types, or other items will be implemented on 100% of the forest management	In the U.S., it can be shown	CW standard	
	units (FMUs) that mills source wood from, and it will be extremely problematic for certificate holders to comply.	that the level of forestland is	reviewed by an	
	The NRA requires the avoidance of "known sources." It will be undeniable that certain occurrences are taking	stable over time (as	attorney. Their	
	place, and certificate holders will not be able in good faith to ignore them. Consider, for example, the 20 & 40-	documented in the NRA).	conclusion was	
		·		
	acre thresholds & other restrictions on conversion. These are problematic for several reasons. First, the mill will	The U.S. should simply be	that the NRA	
	have to know a very fine level of detail about, and document for audit purposes, the intent of thousands of	designated as low risk for	should be found	
	private landowners from whom its wood is sourced. It is simply not practical to accomplish this. Second, the	conversion, without the	lawful if challenged	
	landowner could later change his or her mind, or even misrepresent his or her intent from the beginning and	additional requirements in	under US antitrust	
General	later "un-do" the control measure.	the CW-DDS.	law.	Economic
	Third, and perhaps most importantly, even if the mill could know that level of detail about each FMU, and the			
	situation was that the FMU was not in compliance with the FSC control measure, but was otherwise in full legal			
	compliance, the mill would then be expected to either i) "avoid," i.e., do not accept, wood from such landowner			
	or ii) "exclude" and utilize separately this source from its FSC controlled sources (this alternative was mentioned			
	by FSC-US in the recent webinar). The problem with refusing to buy such material is that it exposes mills to			
	antitrust and unfair trade issues. The problem with separating such material in the mill's production process is			
	that it is simply not practical to keep this wood in a separate pile, then make an extremely small batch run in the			
1	pulping process, then keep the pulp separate to make an extremely small batch run in the paper production			
1	process, and then keep the paper separate in the sales & distribution process. Mills are designed to process high			

	volume production runs, not individual small batches. Another example is the requirements around priority		
	habitats. Even if it were possible to assess & know where these habitats occur, a landowner may refuse to		
	implement the control measures (but still be acting within existing laws & regulations).		
	implement the control measures (our still be detting within existing laws & regulations).		
	Furthermore, the list of priority T&E and priority habitats is subjective and in some cases has the feel of a wish		
	list of certain stakeholders. A practical, reasonable, and impartial way to address these concerns is simply to rely		
	on existing U.S. federal & state laws & regulations. The U.S. has a rigorous system in place to address these		
	concerns.		
	concerns.	Th	
		Thank you for your	
		comment. FSC US	
		has restructured	
		the NRA to make it	
		easier to	
		understand and	
		has worked to	
		ensure that the	
		NRA is workable	
		for FSC Certificate	
	To that point, the decument is you difficult to read and understand. It should be simplified with a close matrix	Holders. The	
	To that point, the document is very difficult to read and understand. It should be simplified with a clear matrix		
	consisting of input type, specific risk condition, and minimum control measures. As a whole, the NRA lacks	Control Measures	
	specific outcomes and is therefore open to company, ENGO, and auditor interpretation. As the NRA is written,	do not identify	
	compliance for my company is not possible and I believe that our efforts would be unauditable. I feel that is	specific mitigation	
	important to note that the tone of the document is a desire to drive forest management on non-certified	actions, rather a	
	properties. This is not the intent of the controlled wood system. In fact, the NRA takes compliance to the FSC	suite of actions will	
	CW standard out of the hands of certified companies and puts that control directly into the hands of suppliers	be identified	
	for both indirect and by-product supply segments.	through a	
	It is paramount that the CWWG remember that the goal of the NRA is not to dictate the conditions of forest	collaborative	
	management on private lands. We need to have a credible risk based system that will reduce our exposure to	dialogue at a	
	inputs that are undesirable. This entire risk assessment from conversion to unmapped risk goes far beyond that,	regional meeting.	
	making compliance by companies trying to implement it impossible. By making these claims, companies open	The collaborative	
	themselves up to reputational risk and public derision by extreme environmental groups and competitors. This	dialogues will be	
	also opens the entire FSC system up to attack by those that are adversarial to our certification scheme. It would	open to non-	
	be very simple for a non-certified competitor to look at what we claim to accomplish with this, credibly go to the	certified	
	public, and prove that there is no possible way that we can back these claims up. The NRA needs to properly	landowners so that	
	recognize the role that controlled wood plays in the system. Company risk assessments have been vilified as	they may engage	
C			
General	being weak, either by intent or lack of due diligence.	with the process.	Economic
	The reality is that this is a very difficult task. Expectations of performance need to be balanced with economic		
	reality and the legal constraints of our competitive environment. The CWWG should conduct a stakeholder		
	outreach to the various impacted groups for the value driven components of the risk assessment. This should		
	include impacted private landowners, state agencies, timber harvesters, academia, environmental groups, etc.		
	The impact of this document extends well beyond the FSC community. The expectations for stakeholder		
	engagement placed on the companies with a CW certificate should be met by the CWWG prior to the release of		
	this document.		
	This risk assessment should be withdrawn until it can be better defined and an understanding of the economic		
	impact of implementation is developed. I am fully aware of the deadline at the end of 2015, but implementing		
	this NRA would be worse for FSC in the US then letting the deadline pass.	T	
		Thank you for your	
	Thanks for the chance to comment in this first public consultation. Despite significant and continuous	comment. The	
	improvement from the forest products industry, industrial logging still continues to negatively impact	Control Measures	
	conservation values in forests around the world. There are still a lot of very controversial forestry practices	in the second draft	
	occurring in the US, Canada, and elsewhere, including legal violations (including on public forests), harm to	of the NRA do not	
	endangered species, logging of old growth, intact forests, and other HCVs, recent governmental approval of	identify specific	
	commercial GMO use in the US, violations of Indigenous People's rights in Canada, and in some areas,	mitigation actions,	
	conversion of forests to energy development, sprawl, and other uses.	rather a suite of	
General		actions will be	Environmental
Canara	I.	actions will be	vii omnemai

	FSC controlled wood system must address this ongoing reality if it is to maintain credibility with the		identified through	
			_	
	environmental community and other key stakeholders. As we move away from the old company-based risk		a collaborative	
	assessment approach, the new system needs to do a dramatically better job of identifying and excluding		dialogue at a	
	controversial sources from FSC labeled products. And the results must be subject to rigorous third party		regional meeting.	
	auditing. The system's credibility depends on it.		Additionally, the	
			DDS has been	
	Of course, the risk assessment and its control measures need to balance effectiveness and practicality. But it's		removed from the	
	not clear the current due diligence system and control measures are sufficiently and consistently robust enough		NRA as it is	
	to move the controlled wood system to a more responsible place. A key concern is whether purchaser		included in the	
	companies are consistently required to take effective action to either ensure that key values are protected in		approved FSC-STD-	
	source forests, or to exclude wood and fiber from controversial sources.		40-005.	
			Thank you for your	
			comment. The	
	We share FSC's interest in expanding forest certification and the availability of certified fiber in the United States.		Control Measures	
	AF&PA remains concerned, however, with the proposed NRA. The limited availability of FSC 100% certified fiber		in the second draft	
	in the U.S. requires a cost- effective and usable CW standard and accompanying NRA. Companies continually		of the NRA do not	
	weigh the benefits of certification against implementation costs. Companies that maintain FSC certifications may		identify specific	
	decide that the NRA and associated monitoring and compliance burdens are too high to continue maintaining		mitigation actions,	
	FSC certifications, particularly given the limited FSC fiber availability, which would erode the value of FSC		rather a suite of	
	certification for landowners.		actions will be	
			identified through	
	FSC-US Should Complete an Economic Impact Analysis of the Proposed "Control Measures" to determine		a collaborative	
	whether the FSC CW system can function effectively in the marketplace. To do so, the requirements of the NRA	FSC-US Should Complete an	dialogue at a	
	must provide benefits to consumers and be economically achievable. The system that has been proposed by FSC-	Economic Impact Analysis of	regional meeting.	
	US in the NRA goes beyond what is reasonable for a company to achieve, and in present form, may prove	the Proposed "Control	The collaborative	
	unworkable in the U.S.	Measures"	dialogues will be	
			open to non-	
	AF&PA requests that the second comment period for the draft NRA be at least 60 days to allow for a thorough	AF&PA requests that the	certified	
	analysis of both the draft Centralized NRA (CNRA) and updated NRA by those interested in commenting. The	second comment period for	landowners so that	
	CNRA was not released by FSC-International until March 2 and was not distributed by FSC-US until March 4th,	the draft NRA be at least 60	they may engage	
	leaving only 11 days for stakeholders to review and understand the CNRA and its relationship to the FSC-US NRA.	days to allow for a thorough	with the process.	
	Commenters need sufficient time to adequately review Risk Category 1, 2, and 5 of the CNRA, which will be part	analysis of both the draft	The second public	
	of the comprehensive NRA that eventually will be finalized, to understand the full burden imposed by all risk	Centralized NRA (CNRA) and	consultation will be	
	categories. In addition, conclusions reached in the CNRA, such as Risk Category 2 – Traditional & Civil Rights	updated NRA by those	at least 60 days	
General	assessments will require revision by FSC- US, limiting the effectiveness of comments by stakeholders.	interested in commenting.	long.	Economic
General	assessments will require revision by FSC- 03, limiting the effectiveness of comments by stakeholders.	interested in commenting.	_	LCOHOITIC
			Thank you for your	
			comment. The	
			term 'contiguous'	
		Use common vernacular -	remains in the	
		"contiguous" United States	second draft of the	
General	Use of uncommon vernacular -"conterminous" United States throughout the CW NRA.	throughout the CW NRA.	NRA.	Economic
		The NRA should be	FSC US waited to	
	We raised concerns about the antitrust risks associated with the Controlled Wood (CW) standard in comments to	withdrawn until changes to	finalize the NRA	
	FSC International on proposed changes to the standard. In essence we noted that suppliers do not voluntarily	the rest of the Controlled	until FSC-STD-40-	
	sign up for the CW standard—it is imposed on them by chain of custody (CoC) holders. Therefore key defenses a	Wood system are finalized,	005 was finalized.	
	voluntary standards system normally has to an antitrust challenge are not available, making other defenses,	including the centralized risk	FSC US is working	
	especially the use of an inclusive, consensus processes, all the more important. Attached are the original	assessments covering the	to engage with	
	comments we filed with FSC International, which we incorporate into these comments by this reference.	US. Then FSC US should form	affected and non-	
	FSC International's published response to our comments is troubling, as it clearly shows they do not understand	a new working group with	certified	
	the issue. They said:	balanced representation	landowners during	
	The NRA serves as the source of risk determination and shall be applied by CoC-certified Organization and NOT	that includes materially	the second	
	by the forest managers (if an Organization owns/ manages forest it shall be independently certified according to	affected interests; that is,	consultation.	
	the FSC-STD-30-010). It is the responsibility of the CoC certified Organization to prove that supplied material	non-FSC-certified	Supplier	
General	does not originate from unacceptable sources and not the responsibility of its supplier.	landowners, especially	agreements and	Economic
- Certeral	assistant strong and and acceptable sources and not are responsibility of its supplier.	.aaovincia, especially	Spicements and	

	family forest owners and	information from	
	family forest owners and		
	agencies representing public	sub-suppliers are	
	lands, loggers, and non-FSC-	not required. The	
	certified mills.	risk mitigation	
		approach avoids	
		wood exclusion by	
		ensuring that	
		certificate holders	
		have options with	
		each making their	
		own decision	
		based on their	
		situation.	
		Additionally, FSC	
		has had the revised	
		CW standard	
		reviewed by an	
		attorney. Their	
		-	
		conclusion was that the NRA	
		should be found	
		lawful if challenged	
		under US antitrust	
		law.	
In other words, FSC International is reinforcing our point that the forest managers affected are not signing up for			
a voluntary standard; its requirements are being imposed on them by the CoC holders. And by virtue of			
complying with a standard the CoC holders are acting in concert, bringing them (and the standards body) under			
US antitrust laws.			
These same concerns apply to the FSC US National Risk Assessment (NRA). We understand FSC US believes its			
processes are adequate because they allow for public comment by affected landowners. This is wholly			
inadequate. US law and policy clearly define acceptable processes for inclusive, consensus standards. Our			
comments to FSC International provide the references. Materially affected interests—including non-FSC-certified			
landowners and especially family-forest owners and agencies managing public lands—must have a vote in a			
decision-making process in which their interests cannot be dominated. Being relegated to a public comment			
period does not come close to meeting these requirements.			
In addition to the risks associated with not giving materially affected interests a meaningful role in the decision-			
making process, FSC is also not following its own procedures in setting standards. Most importantly, the NRA			
departs significantly from the risk assessments approved under the existing CW Standard, yet the standard has			
not been changed. This means either the existing company risk assessments and proposed NRA are arbitrary, or			
the proposed NRA is based on a different standard. We suspect the latter is the case, meaning FSC US is			
operating on an assumption that proposed changes to the governing CW standard are in effect. This is reinforced			
by FSC International's response to comments repeatedly saying that the requirements in the NRAs are being			
"strengthened," implicitly without waiting for the standard-setting process to be completed and the revised CW			
standard to be approved through FSC's voting process. This denies the affected interests—incomplete though			
they are—due process under every existing convention for standards development.			
A better approach would be to assume FSC International will take into account feedback received during three			
rounds of public comment and move amendments to the CW Standard through its governance process without			
cutting corners. That means FSC US cannot know at this point when the revised standard will take effect or what			
new requirements it will contain. Because the NRA is only a piece of the greater Controlled Wood program, the			
NRA should be withdrawn until changes to the rest of the Controlled Wood system are finalized. Then, FSC US			
should form a working group that is truly representative of materially affected interests and reconvene the			
process. In addition to the problems described above, the draft NRA is incomplete. FSC-US has only addressed two of the			
five controversial sources governed by the Controlled Wood system: HCVFs and Conversion. The other three			

	controversial sources topics (legality, indigenous peoples rights, and GMOs) were evaluated by firms in the		
	United Kingdom and put out for public comment only recently. No information has been provided about how the		
	outcomes of these other evaluations will be incorporated into the (partial) draft NRA currently out for comment.		
	Affected landowners, loggers, and other suppliers should not be asked to conduct piecemeal review and		
	comment on portions of the draft NRA.		
	We have many other, more detailed comments we will provide in face-to-face meetings and during the next		
	round of public comment.		
		The CNRA for	
		Category 2 has	
	MWV requests that the second comment period for the draft NRA be at least 60 days to allow for a thorough	been incorpora	ated
	analysis of both the draft Centralized NRA (CNRA) and the anticipated second draft of the FSC-US NRA.	into the secon	d
	Certificate holders and members need sufficient time to adequately review Risk Category 1, 2, and 5 of the	draft of the NR	A.
	CNRA, which will be	The public	
	part of the comprehensive NRA that eventually will be finalized. In addition, conclusions reached in the CNRA,	consultation p	eriod
	such as Risk Category 2 – Traditional & Civil Rights assessments will require revision by FSC-US, limiting the	will also be 60	
General	effectiveness of comments by stakeholders.	days.	Economic
		FSC US waited	
		finalize the NR	
		until FSC-STD-4	
1		005 was finaliz	
		FSC US is work	
		to engage with	•
		affected and n	
		certified	OII-
			ring
		landowners du the second	iiiig
		consultation.	
		Supplier	
		agreements ar	
	The proposed changes to the Controlled Wood program represent a fundamental shift from the current	information fro	
	program. The proposed system takes standards and processes that certain landowners accept voluntarily to	sub-suppliers a	
	obtain FSC certification of their own forests and imposes them on all forest landowners providing products to	not required. 1	
	downstream participants with FSC Chain of Custody (CoC) certification. The practical effect of such a system will	risk mitigation	
	be to create regions that FSC CoC -certified buyers will collectively boycott. These boycotts could be permanent	approach avoid	
	or lifted only after landowners absorb higher costs, in the form of expensive studies or surveys to prove the	wood exclusio	n by
	absence of perceived risk, changes in their forest management practices, or certification under the FSC CW	ensuring that	
	Forest Management Standard. In other words, landowners who may not even be aware of the Controlled Wood	certificate hold	
1	program may suddenly be left wondering why no one will buy their wood. Group boycotts are potentially illegal	have options v	
	under the U.S. antitrust laws.	each making th	neir
		own decision	
	The NRA Should be Not be Issued When the Governing Controlled Wood Standard is Not Finalized. FSC	based on their	
1	International has been working on changes to the Controlled Wood system since 2011. At this point, it is unclear	situation.	
	when the revised standard will take effect or what new requirements it will contain (i.e., whether FSC will take	Additionally, F	
	into account feedback received during three rounds of comment). The NRA is only a piece of the greater	has had the re	vised
1	Controlled Wood program. Because these pieces must work together, publishing the draft NRA before the	CW standard	
	standard is complete denies affected parties the limited procedural protections they get from FSC's public	reviewed by ar	
	standards development process. At a minimum the NRA should be withdrawn until changes to the rest of the	attorney. Their	
	Controlled Wood system are finalized, then reconvened in light of the new standard. The reconvened working	conclusion was	5
	group should include voting representation from materially affected parties, specifically non-FSC-certified forest	that the NRA	
	owners, including large and small private owners and state and federal agencies managing public lands. These	should be four	nd
	interests are not meaningfully represented in FSC's processes today, which will increase the Controlled Wood	lawful if challe	nged
	standard's vulnerability to challenge under the Federal Trade Commission's Green Guides and U.S. antitrust laws	under US antit	rust
General	related to private standards.	law.	Economic
	1		

			. 1
		FSC US has work	red
		to make the	
		second draft of	the
		NRA workable a	nd
		easier to	
		understand for	
		CHs. Additionall	y,
		the scale of risk	• •
		designations ha	
		been reevaluate	
	The National Risk Assessment ("NRA") is extremely complicated and its implementation is difficult to understand	to make it easie	
	as it skips around and applies different requirements for the various types of supply and risk levels. The overall	for CHs to	'
	HCVF designations are both significant and expansive and will be difficult to implement. As the program	determine if the	ere
	becomes more onerous in an effort to mitigate risk, the ultimate objective to avoid true controversial sources	are areas of	
	becomes less achievable in that GP believes (i) the unique balance of risk, benefits and costs are now becoming	specified risk	
	out of balance and (ii) the NRA is no longer a risk assessment but instead there does not seem to be a larger	within their sup	· ·
General	landscape level assessment but rather excessive drill down to individual acres	chains.	Economic
		FSC US has work	red
		to make the	
		second draft of	the
		NRA workable f	or
		FSC Certificate	
		Holders. The	
		second draft of	the
		NRA includes a	
		much greater le	vel
		of documentation	
		and rationale	511
		provided for the	
		•	
		risk designation	s,
		including an	
		assessment of	
		whether or not	
		HCV is threaten	ed
		by forest	
	1. We are concerned that, without sufficient justification or rationale, FSC US proposes to significantly expand	management. T	he
	the scope of the FSC Controlled Wood Standard to include broad geographic areas of "Specified Risk." It is not	scale of risk	
	credible or practical that FSC US can change the Controlled Wood rules, without a thorough analysis and	designations ha	s
	justification of the need for the change. All of our assessments, as well as other FSC Risk Assessments that we	also been revise	d
	are aware of, have concluded "Low Risk" and FSC Certification Bodies and FSC International have approved those	to assist certific	ate
	assessments.	holders in	
		determining	
	2. We have a significant concern that FSC has continuously changed, and made more restrictive, the rules and	whether or not	
	requirements for its Chain of Custody and Controlled Wood Standards. This continual ratcheting down of the	they areas of	
	rules to make them more prescriptive, costly and burdensome, without adequate explanation of the benefits to	specified risk ar	<u> </u>
	the forest resource and the industry is not acceptable.	within their sup	
	the forest resource and the industry is not acceptable.		
	2 Our purposing to date has demonstrated that the U.S. forest and assessing during her assessing to	areas. The Cont	
	3. Our experience to date has demonstrated that the U.S. forest and paper industry has a very good record of	Measures do no	
	training loggers, complying with applicable laws and regulations, implementing voluntary BMPs, protecting	identify specific	
	Forests of Exceptional Conservation Value and providing biodiversity at the stand and landscape levels. BMP	mitigation actio	
	compliance is reported by state forestry agencies to be in the 95% range and very close to 100% of the loggers	rather a suite of	
	have received training through collective SFI Implementation Committee programs. All current risk assessments	actions will be	
	and analysis support the overall conclusion that there is a very Low to Negligible Risk of sourcing controversial	identified throu	gh
	wood. In spite of this exemplary record, FSC proposes unjustified additional Control Measures that will carry	a collaborative	
General	substantial costs.	dialogue at a	Economic

			regional meeting. The collaborative dialogues will be open to non- certified landowners so that they may engage with the process.	
	4. FSC US has not conducted or discussed any economic analysis of the costs and barriers of implementing the proposed "Control Measures" and other additional requirements. The costs to our organization are likely to be substantial and have not been justified on an objective risk basis by FSC US. We anticipate a substantial increase		with the process.	
	in the costs of the following activities:			
	a. analyzing the new Specified Risk areas,			
	b. developing and implementing Control Measures,			
	c. conducting consultations with outside experts,			
	d. conducting staff and contractor training of hundreds of suppliers,			
	e. monitoring the effectiveness of the control measures across thousands of acres of forest land owned by other private landowners, and			
	f. paying the costs of auditors to conduct a sub-sample of forest tracts not owned by our Company.			
	5. The wood harvested in our wood supply areas is harvested by experienced and trained loggers, through open market contracts where we have no contract with the owners of the forests. At the present, only a handful of			
	our wood suppliers are certified to the FSC standard. Each of those who are certified has expressed significant concern as it relates to more rules and processes driving up costs and increasing regulatory burdens.			
	6. Complex rules and processes stemming from controlled wood requirements will fall on portions of the supply			
	chain least able to adapt to changes and absorb additional costs. Fiber harvesting operations working on non-			
	certified lands are not accustomed to, or capable of, absorbing additional costs and they require more flexibility			
	in their operations due to the "spot" nature of their wood orders and the smaller size of the tracts and			
	ownerships they typically rely on.			
	7. FSC US inappropriately proposes that wood procurement organizations "require" the signing of "Supplier			
	Agreements" and implementation of "Control Measures" on private landowners that have not chosen to			
	voluntarily participate in the FSC scheme, thereby extending FSC's reach beyond willing participants. This is an			
	unacceptable aspect of the FSC National Risk Assessment.			
	13. We are further concerned that FSC US will, by its proposed US National Risk Assessment and Control			
	Measures, effectively drive FSC Certificate Holders, suppliers and landowners away from the FSC Program. FSC			
	would be better served to find ways to make FSC certification more reasonable, cost-effective and affordable			
	and increase the acreage of FSC Certified Forests, of which there are very few within the wood supply region of our primary Controlled Wood procurement facility.			
	14. Due to the lack of analysis and justification for the major expansion of Specified Risk Areas into private lands			
	that have not agreed to participate in the FSC Standards program, FSC US would be well served to retract its			
	proposed Draft US National Risk Assessment, conduct an adequate economic and practical analysis and more			
	effectively engage FSC Certificate Holders, suppliers and private landowners that it seeks to regulate in a more			
	inclusive and open dialogue.			
		Simplify, simplify, simplify.	Thank you for your	
		FSC certified companies	comment. FSC US	
		must be competitive to do	has worked to	
		business in the market place.	make the second	
		Provide NRA template and	draft of the NRA	
	Burden of proof to show fiber is originating from controlled sources is already cumbersome when using company	guidance.	workable for FSC	
	derived risk assessments. Suppliers are asked to provide enough as it is when doing business with an FSC	Establish NRA as a simple	Certificate Holders.	
	certified company. Asking for more will place FSC participants out of the market allowing noncertified	framework in which	The Control	
	companies to access more economical fiber by not requiring as much. "Specified risk" designation spurs participants to implement control measures. Control measures are set by the	companies can fill in the	Measures do not identify specific	
	NRA working group. Why not allow participants to implement control measures. Control measures are set by the	gaps with information that is relevant to their wood	mitigation actions,	
General	determine if those control measures meet the spirit and intent of the FSC Controlled Wood Std?	procurement catchments.	rather a suite of	Economic
Contorui	determine it allose control mediates meet the spine and intent of the 150 controlled wood stat	p. startinent taterinents.	. action a suite of	

RMS firmly believes all wood from any forest third party certified to the FSC, SFL or American Tree Farm (AFT) certification schemes should be designated low risk. All three certification systems are receible, each of the three is appropriate for various forest landowners, and third party certification on any of the three provide proof positive of responsible forest management. It is time to move past the "certification systems as sources of low risk fiber." Rather than continue petty bickering that wastes time, money, and resources, all three certification schemes should focus on increasing the number of third party certified acres in the United States, and mutually recognize each other as promoting responsible forest management, products that are form sustainably managed forests, and products that end customers can purchase knowing their buying decisions represent an environmentally sound decision. In closing, thank you for the opportunity to provide comments on the FSC US Controlled Wood National Risk Assessment and for your thoughtful consideration of our comments. The United States as a whole grows, harvests and manufactures products from the lowest risk forests in the world. It is a fact and a competitive advantage for private forest landowners in this country. Further, millions of acres of privately and publically owned forestaln in the USs are third party certified to the FSC, SFL or Aff Forest standards, and wood from any of these forests should be accepted as low risk by FSC, SFL or any other credible chain of custody standards. AMA that electourage forest certification rather than seeks opportunities to grow certifies to grow certifies decrease using all the countries to grow certifies to grow certifies of standards when the provide the concentration of the state seeks opportunities to grow certifies to grow certifies of the state of			No need to put information and references to species from all over the country. Develop framework style NRA with specified risks and allow participant to define control measures within parameters.	actions will be identified through a collaborative dialogue at a regional meeting. The collaborative dialogues will be open to noncertified landowners so that they may engage with the process.	
Assessment and for your thoughful consideration of our comments. The United States as a whole grows, harvests and manufactures products from the lowest risk forests in the world. It is a fact and a competitive advantage for private forest landowners in this country. Further, millions of acres of privately and publically owned forestiand in the US are third party certified to the FSC, SFI or any other credible chain of custody standards. RMS sees opportunities to grow certified acres using all three of these standards; we strongly urge FSC to adopt a NRA that encurages forest certification rather than seeks opportunities to label wood "high." The end goal of all forest management, procurement, or chain of custody standards should be to encourage responsible forest management, not forward agendas or biases that discourage forest landowners from sustainable forest management. We ask FSC help advance responsible and sustainable management of forests in the United States by recognizing wood from all three certification systems as low risk. General, Certification As a general point, it appears that controlled wood risk assessment is floating more and more towards becoming "FSC-light." That's fine if that is the objective of the current FSC controlled wood system. I'm not sure it is, but I think it's worth examining overall how these measures are implemented. As a result of this NRA, CW assessment in the didding of the process, including additional protections and measures being implemented. I fear much of this will be a paper exercise with little actual meaning on the ground. In addition, a collaborative dialogue at a regional meeting. General, Oregon Wild supports adoption of robust procedures to identify high conservation value forests and other "at Thank you for your comment. FSC of adoption of robust procedures to leave the system. Again, fine if the goal is the deded paper work and tracking requirements will likely cause some to leave the system. Again, fine if the goal is present that the system. Just not		certification schemes should be designated low risk. All three certification systems are credible, each of the three is appropriate for various forest landowners, and third party certification to any of the three provide proof positive of responsible forest management. It is time to move past the "certification wars", certification politics, and individual stakeholder agendas and openly accept all three certification systems as sources of low risk fiber. Rather than continue petty bickering that wastes time, money, and resources, all three certification schemes should focus on increasing the number of third party certified acres in the United States, and mutually recognize each other as promoting responsible forest management, products that are from sustainably managed forests, and products that end customers can purchase knowing their buying decisions represent an environmentally		with the process.	
Thank you for your comment. FSC US has worked to make the second draft of the NRA workable for FSC Certificate Holders. The Control Measures do not identify specific mitigation actions, "FSC-light." That's fine if that is the objective of the current FSC controlled wood system. I'm not sure it is, but I think it's worth examining overall how these measures are implemented. As a result of this NRA, CW assessment will become a far more technical and refined process, including additional protections and measures being implemented. I fear much of this will be a paper exercise with little actual meaning on the ground. In addition, the added paperwork and tracking requirements will likely cause some to leave the system. Again, fine if the goal dialogue at a regional meeting. Economic General, General, Oregon Wild supports adoption of robust procedures to identify high conservation value forests and other "at Thank you for your	•	Assessment and for your thoughtful consideration of our comments. The United States as a whole grows, harvests and manufactures products from the lowest risk forests in the world. It is a fact and a competitive advantage for private forest landowners in this country. Further, millions of acres of privately and publically owned forestland in the US are third party certified to the FSC, SFI, or ATF forest standards, and wood from any of these forests should be accepted as low risk by FSC, SFI or any other credible chain of custody standards. RMS sees opportunities to grow certified acres using all three of these standards; we strongly urge FSC to adopt a NRA that encourages forest certification rather than seeks opportunities to label wood "high risk". The end goal of all forest management, procurement, or chain of custody standards should be to encourage responsible forest management. Not forward agendas or biases that discourage forest landowners from sustainable forest management. We ask FSC help advance responsible and sustainable management of forests in the United States		· · · · · · · · · · · · · · · · · · ·	
General, Oregon Wild supports adoption of robust procedures to identify high conservation value forests and other "at Thank you for your	General,	As a general point, it appears that controlled wood risk assessment is floating more and more towards becoming "FSC-light." That's fine if that is the objective of the current FSC controlled wood system. I'm not sure it is, but I think it's worth examining overall how these measures are implemented. As a result of this NRA, CW assessment will become a far more technical and refined process, including additional protections and measures being implemented. I fear much of this will be a paper exercise with little actual meaning on the ground. In addition, the added paperwork and tracking requirements will likely cause some to leave the system. Again, fine if the goal		Thank you for your comment. FSC US has worked to make the second draft of the NRA workable for FSC Certificate Holders. The Control Measures do not identify specific mitigation actions, rather a suite of actions will be identified through a collaborative dialogue at a	
					Economic
	General, Certification	Oregon Wild supports adoption of robust procedures to identify high conservation value forests and other "at risk" values, and effective control measures for avoiding/protecting these values. FSC must seize this opportunity		Thank you for your comment	Environmental

			l
	to strengthen the integrity of the FSC's "green" market claims, and to begin improving forest management and		
	conservation practices on uncertified forests.		
	The proposed changes to the FSC CW framework represent a fundamental shift away from a program meant to		
	reasonably minimize the risk of wood from sources widely viewed as unacceptable to an unreasonable and		
	burdensome program requiring landowners and CoC holders to prove the absence of any risk or to implement		
	unreasonable control measures. The proposed shift in the CW process will effectively force a previously-		
	voluntary certification system on landowners through implementation of the NRA, specifically by identification		
	of "critical biodiversity areas", "priority forest types", and "priority T&E species" and protections for each; and		
	commitment to develop "supplier agreements" to implement "control measures". These are but a few examples		
	of the overreach contained in the draft NRA. Finally, we are aware that other parties are making an argument		
	that suggests potential legal challenges to implementation of the CW process and NRA and are watching those		
	developments closely.		
	With respect to these comments, we do not intend to present an exhaustive list of objectionable provisions		
	within the NRA, frankly the list is too long. Instead, below we highlight major concerns and suggest that you		
	consider our comments in the broadest context possible.		
	Recognize wood from all credible third-party certification systems as low risk. In the United States, FSC,	Thank you for your	
	Sustainable Forestry Initiative (SFI), and the American Tree Farm System (ATFS) are considered credible	comment. FSC US	
		has worked to	
	certification standards. Environmental activists attempt to suggest otherwise, but for the sake of the		
	environment, FSC needs to disassociate itself from the debate and at a minimum declare wood from SFI and ATFS as low risk. To do otherwise will continue to focus the debate on which certification system is better and	make the second draft of the NRA	
Comoral	·	workable for FSC	
General, Certification	detract from the intended purpose of all systems to minimize risk of environmental harm either through direct	Certificate Holders.	Faanamia
certification	forest management or procurement of non-certified sources.		Economic
	Evergreen Packaging is concerned that FSC US will, by its proposed US National Risk Assessment and Control	Thank you for your	
	Measures, effectively drive FSC Certificate Holders, suppliers and landowners away from the FSC Program. FSC	comment. FSC US	
	would be better served to find ways to make FSC certification more reasonable and affordable and increase the	has worked to	
	acreage of FSC Certified Forests, of which there are very few in the supply regions of Evergreen Packaging's	make the second	
Canada	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC	draft of the NRA	
· ·	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60	draft of the NRA workable for FSC	Economic
General, Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC	draft of the NRA	Economic
Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill.	draft of the NRA workable for FSC	Economic
Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60	draft of the NRA workable for FSC	Economic
Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill.	draft of the NRA workable for FSC Certificate Holders. FSC has worked to	Economic
Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill.	draft of the NRA workable for FSC Certificate Holders. FSC has worked to improve the	Economic
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Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill.	draft of the NRA workable for FSC Certificate Holders. FSC has worked to improve the documentation and rationale for the risk designations.	Economic
Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill.	draft of the NRA workable for FSC Certificate Holders. FSC has worked to improve the documentation and rationale for the risk designations. Additionally, the	Economic
Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill.	draft of the NRA workable for FSC Certificate Holders. FSC has worked to improve the documentation and rationale for the risk designations.	Economic
Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill.	draft of the NRA workable for FSC Certificate Holders. FSC has worked to improve the documentation and rationale for the risk designations. Additionally, the	Economic
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Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill.	raft of the NRA workable for FSC Certificate Holders. FSC has worked to improve the documentation and rationale for the risk designations. Additionally, the Control Measures include	Economic
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Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill. Ssessment and Control Measures High Conservation Value Risk Assessment and Control Measures: The FSC US states that it has determined based	draft of the NRA workable for FSC Certificate Holders. FSC has worked to improve the documentation and rationale for the risk designations. Additionally, the Control Measures include collaborative dialogues to	Economic
Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill. Ssessment and Control Measures High Conservation Value Risk Assessment and Control Measures: The FSC US states that it has determined based upon "expert consultation and discussion among the Controlled Wood Working Group members" that certain	FSC has worked to improve the documentation and rationale for the risk designations. Additionally, the Control Measures include collaborative dialogues to determine a suite	Economic
Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill. **Ssessment and Control Measures** High Conservation Value Risk Assessment and Control Measures: The FSC US states that it has determined based upon "expert consultation and discussion among the Controlled Wood Working Group members" that certain High Conservation Values are under significant risk from current forestry activities. As such, Control Measures	FSC has worked to improve the documentation and rationale for the risk designations. Additionally, the Control Measures include collaborative dialogues to determine a suite of appropriate	Economic
Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill. **Ssessment and Control Measures** High Conservation Value Risk Assessment and Control Measures: The FSC US states that it has determined based upon "expert consultation and discussion among the Controlled Wood Working Group members" that certain High Conservation Values are under significant risk from current forestry activities. As such, Control Measures are required to protect the HCVs from significant threat. Control Measures may either "avoid" materials from	FSC has worked to improve the documentation and rationale for the risk designations. Additionally, the Control Measures include collaborative dialogues to determine a suite of appropriate mitigation	Economic
Certification Part 2: HCV Risk A	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill. Ssessment and Control Measures High Conservation Value Risk Assessment and Control Measures: The FSC US states that it has determined based upon "expert consultation and discussion among the Controlled Wood Working Group members" that certain High Conservation Values are under significant risk from current forestry activities. As such, Control Measures are required to protect the HCVs from significant threat. Control Measures may either "avoid" materials from unwanted sources or "protect" the values associated with the HCV.	FSC has worked to improve the documentation and rationale for the risk designations. Additionally, the Control Measures include collaborative dialogues to determine a suite of appropriate mitigation activities that are	Economic
Certification Part 2: HCV Risk A	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill. Ssessment and Control Measures High Conservation Value Risk Assessment and Control Measures: The FSC US states that it has determined based upon "expert consultation and discussion among the Controlled Wood Working Group members" that certain High Conservation Values are under significant risk from current forestry activities. As such, Control Measures are required to protect the HCVs from significant threat. Control Measures may either "avoid" materials from unwanted sources or "protect" the values associated with the HCV. In short, FSC US is requiring either "Avoidance" of certain areas, or the imposition of additional regulations	FSC has worked to improve the documentation and rationale for the risk designations. Additionally, the Control Measures include collaborative dialogues to determine a suite of appropriate mitigation activities that are commensurate	Economic
Certification	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill. **Seessment and Control Measures** High Conservation Value Risk Assessment and Control Measures: The FSC US states that it has determined based upon "expert consultation and discussion among the Controlled Wood Working Group members" that certain High Conservation Values are under significant risk from current forestry activities. As such, Control Measures are required to protect the HCVs from significant threat. Control Measures may either "avoid" materials from unwanted sources or "protect" the values associated with the HCV. In short, FSC US is requiring either "Avoidance" of certain areas, or the imposition of additional regulations implemented and enforced by FSC Certificate Holders on independent landowners. These two principal	FSC has worked to improve the documentation and rationale for the risk designations. Additionally, the Control Measures include collaborative dialogues to determine a suite of appropriate mitigation activities that are commensurate with their scale of	
Certification Part 2: HCV Risk A	manufacturing facilities. Evergreen Packaging has taken a leadership position in getting forests certified to FSC standards. Under our Group Membership program (FSC-C112428), Evergreen has worked with over 60 landowners to get over 45,000 acre certified in the area around our Canton, NC pulp and paper mill. Ssessment and Control Measures High Conservation Value Risk Assessment and Control Measures: The FSC US states that it has determined based upon "expert consultation and discussion among the Controlled Wood Working Group members" that certain High Conservation Values are under significant risk from current forestry activities. As such, Control Measures are required to protect the HCVs from significant threat. Control Measures may either "avoid" materials from unwanted sources or "protect" the values associated with the HCV. In short, FSC US is requiring either "Avoidance" of certain areas, or the imposition of additional regulations implemented and enforced by FSC Certificate Holders on independent landowners. These two principal concepts of the FSC US are not implementable and will likely be subjected to legal challenge.	FSC has worked to improve the documentation and rationale for the risk designations. Additionally, the Control Measures include collaborative dialogues to determine a suite of appropriate mitigation activities that are commensurate with their scale of operations.	

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	consideration of control measures. The lack of transparency in the proposed process creates significant risk for	of documentation	
	participating CoC holders as well as the landowners they attempt to procure wood from.	and rationale	
		provided for the	
		risk designations,	
		including an	
		assessment of	
		whether or not the	
		HCV is threatened	
		by forest	
		management.	
		The second draft of	
		the NRA includes a	
		much greater level	
		of documentation	
		and rationale	
		provided for the	
		risk designations,	
		including an	
		assessment of	
		whether or not the	
		HCV is threatened	
		by forest	
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		management. Additionally, the	
		**	
		scale of risk designations has	
		S	
		been reevaluated	
		to make it easier	
		for CHs to	
		determine if there	
		are areas of	
		specified risk	
		within their supply	
		chains. The Control	
		Measures include	
		collaborative	
		dialogues to	
		determine a suite	
	The draft NRA designations represent a focused effort at addressing conservation issues through the Controlled	of appropriate	
	Wood system using Critical Biodiversity Areas, Priority Threatened and Endangered Species, Priority Forest	mitigation	
	Types, Old Growth, Roadless and Intact Forest Landscapes. What the NRA does not include is a full granular	activities that are	
	mapping of endangered species across the landscape. Therefore it is critical that the DDS and Control Measures	commensurate	
I. Introduction &	contain sufficient rigor address real concerns about those habitats and species that were not mapped. If there is	with their scale of	
Summary	not a rigorous system, it would be appropriate to reconsider risk designation for those species.	operations.	Environmental
		The second draft of	
		the NRA includes a	
		much greater level	
		of documentation	
	High Conservation Value Risk Assessment and Control Measures: The FSC US states that it has determined based	and rationale	
	upon "expert consultation and discussion among the Controlled Wood Working Group members" that certain	provided for the	
	High Conservation Values are under significant risk from current forestry activities. As such, Control Measures	risk designations,	
	are required to protect the HCVs from significant threat. Control Measures may either "avoid" materials from	including an	
	unwanted sources or "protect" the values associated with the HCV.	assessment of	
I. Introduction &	It is of great concern that FSC US has found such expansive areas of "specified risk" for HCVF and is making the	whether or not the	
Summary	process of risk mitigation impossible to achieve under this risk assessment process.	HCV is threatened	Economic

			hf	1
			by forest	
			management.	
		Please reconsider the brevity		
		of publically committing FSC		
		participants to avoiding such		
		designated areas (HCVs &		
		Conversion) and allow		
		companies to evaluate the		
		-		
		provided information in the		
		NRA, derive their own		
		procedures and be audited		
		upon their actions to ensure		
		they are meeting the spirit		
		and intent of the controlled		
		wood standard.		
	Companies cannot publically blackball a supplier, landowner or region. We all know that work is performed just	Transparency and integrity		
	like electricity travels, down the path of least resistance. Certified companies will avoid these areas if they can	still remains but is displayed		
	afford to do so and noncertified companies will be alerted to a "honey hole" lacking competition due to	vaguely in audit reports		
I. Introduction &	certification standards. Landowners will experience less return for their forests in these designated areas that	without having a publicly	Thank you for your	
		= : :		Economic
Summary	encompass private landowners. "What pays, stays!" and "Healthy Markets = Healthy Forests"	displayed map.	comments.	Economic
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
			to make it easier	
			for CHs to	
			determine if there	
			are areas of	
			specified risk	
			within their supply	
			chains. FSC US also	
			plans to make a	
			shapefile of the	
	We need some sort of geographic feature of the TNC analysis depicted on the webpage. Best option would be to		areas of specified	
1.1 Summary of	provide these in a series of KML (google earth) files. This should be fairly easy to do and if we want to use this		risk available upon	
Results	data it needs to be publically available and spatially explicit – which it is NOT on this map.		request.	Economic
	Recognize the Oregon Cascades as an Intact Forest Landscape or a Critical Biodiversity Area		These areas were	
	The NRA should recognize the federal lands in the Oregon Cascades as an intact forest landscape. This area is		determined by the	
	partially fragmented by past logging, but it still represents a large intact forest landscape because		Critical Biodiversity	
İ	(1) The spine of the Cascades is protected by numerous wilderness areas (and surrounding roadless areas and		Areas Dataset that	!
1.1 Summary of	Crater Lake National Park),		identifies areas	
Results	(2) The National Forests in the Oregon Cascades are far more intact than nearby private lands and BLM lands.		with high	Environmental
nesults	12) The Madional Forests in the Oregon Cascades are fair filler intact than flearby private lands alld blivi idilus.		vvitii iiigii	LITVITOTITITETILAT

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	See this map showing the concentration of relatively high canopy cover along the Cascades from the Columbia	concent	trations of
	River south to Crater Lake:	rare spe	ecies. These
	http://www.oregon.gov/odf/resource_planning/forestatlas/forestland_canopy_cover.jpg and this map showing	areas w	ere then
	the concentration of large trees in that same area:	assesse	d to
	http://www.oregon.gov/odf/resource_planning/forestatlas/forestland_tree_size_class.jpg	determ	ine if they
	(3) The adoption of the Northwest Forest Plan incorporates a new vision of conservation and restoration of a	are beir	ng
	"functional interconnected old forest ecosystem" with large reserves and provisions for dispersal between those	threate	_
	reserves. This intent should be recognized as an intact forest landscape. The Northwest Forest Plan is explicitly	forest	,
	intended to conserve "viable populations of the great majority of the naturally occurring species in natural		ement. This
	patterns of distribution and abundance" meeting HCV 2. The Late Successional Reserves and riparian reserves	_	dology, and
	adopted in the Northwest Forest Plan can be considered an improvement on the critical habitat designations		re results,
	because they are based on ecosystem conservation, rather than single-species management.	remains	•
	because they are based on ecosystem conservation, rather than single-species management.		ged in the
			draft of the
		NRA, alt	_
		addition	
		docume	
			ionale have
		been pr	ovided.
	(4) The Oregon Cascades represents the heart of the Northwest Forest Plan, which is an interagency plan		
	specifically intended to protect biodiversity within the range of the Threatened northern spotted owl. More than		
	1100 old-forest-associated species have been identified in this region. This represents high biodiversity for a		
	temperate conifer forest landscape. The biodiversity of the Oregon Cascades are significant at regional or		
	national (if not global) levels. See http://www.blm.gov/or/plans/nwfpnepa/		
	5) The Northwest Forest Plan in the Oregon Cascades represent a great step towards climate change adaptation		
	because the NFP reserve network protects a large landscape with opportunities for wildlife migration along		
	north-south gradient following the spine of the Cascades, as well as complex topography that offers		
	opportunities for wildlife to move along elevation gradients. The Northwest Forest Plan also provides for		
	connectivity between reserves via riparian reserves and other protective standards.		
	6) The Northwest Forest Plan in the Oregon Cascades represents a great contribution toward climate change		
	mitigation because these cool moist forests store a globally significant amount of carbon.		
	mingation because these coormoist forests store a globally significant amount of carbon.	Thorne	ond draft of
	Definition of HOVe. The definition of HOVe has been similar to the desired bands of the desired bands.		A includes a
	Definition of HCVs. The definition of HCVs has been significantly expanded and is overly broad and redundant	_	reater level
	with existing forest practices regulations and other laws in the United States. The proposed CW process also		mentation
	incorporates all of the HCV-related standards in the FSC Principles and Criteria or national standards, effectively		the HCVs
	leaving little difference between the CW program and FSC forest certification. Again, this overreach suggests that		nalyzed and
	the CW program is becoming as onerous as FSC forest management certification, which a landowner may	more ra	
	voluntarily choose not to use. In the context of CW, definitions will be imposed on landowners, potentially	·	d for the
	without their knowledge or participation, and there will inevitably be inconsistent interpretations of HCV	risk des	ignations,
	requirements. Such inconsistencies will likely come from stakeholders during the development of risk	includin	ng an
	assessments and by auditors during implementation. This, in turn, will lead to disputes, complaints, and	assessm	nent of
	inconsistent enforcement of HCV risk criteria. To address these defects, the definition of HCVs should be	whethe	r or not the
	narrowly tailored to achieve the supported goal of avoiding wood from truly "unacceptable" sources. At a	HCV is t	hreatened
	minimum, the CW system should retain the existing criteria to assess risk to HCVs at an ecoregion or coarser	by fores	
	level.	manage	
			nally, the
	Specific HCV delineations and control measures. The specific delineation of "critical biodiversity areas", "priority	scale of	
	forest types", and "priority T&E species" creates a prescriptive methodology for defined areas of specified risk.		tions has
	Such prescriptive assignments of both the resource and control measures are not consistent with common		evaluated
	, , ,		e it easier
	practice of conducting risk assessments. A due diligence system should describe the intent whereas the system		
	developed by the CoC holder should identify the risks and prescribe the control measures. It is a dangerous	for CHs	
	precedent to use expert opinion or other non-transparent processes to create high- risk categories that require		ine if there
1.1 Summary of	landowners to implement control measures that are open-endedand go well beyond legal requirements.	are area	
Results	Furthermore, the CW process references NatureServe as a source for species location data.	specifie	d risk Economic

		T	within their supply	
			within their supply	
			chains.	
	In Michigan, areas of low risk identified as "GAP Status 2" on the TNC analysis web map			
110	(http://foreststewardshipcouncil.s3.amazonaws.com/index.html) appear to include all U.S. Forest Service lands,	Only include U.S. Forest		
1.1 Summary of	as opposed to only those areas with permanent protections such as Congressionally Designated Wilderness	Service lands with GAP	Thank you for your	
Results	Areas	Status 2 protections.	comment.	Economic
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
	Appyion is concerned that the National Risk Assessment is based more on perception and values than on good		been reevaluated	
	science and research information. Terms such as "potential" and "may impact" appear numerous times with		to make it easier	
	respect to "threats." The NRA presents no technical basis for perceptions that, for example, "shovel logging"		for CHs to	
	may result in undesirable regeneration and that "Alabama BMPs" may not adequately protect aquatic resources.		determine if there	
	may result in undestrable regeneration and that Alabama Birn's may not adequately protect aquatic resources.		are areas of	
	Appyion is concerned that the NRA is overly value driven and based in part on stakeholder inputs and through		specified risk	
1.1 Summary of	consultation with unnamed "regional experts. The NRA presents no information about the qualifications of the		within their supply	
Results	regional experts who selected areas for further protection or methods and criteria that were used.		chains.	Economic
Results	The table needs lots more explanation. I feel like I'm reading latin. I have no idea what is being referenced, were		The second draft of	Leonomic
	the thresholds came from, and what exactly each column is supposed to denote. Please revise and provide some		the NRA uses the	
	context for the table so the reader understands what exactly they are looking at!		FSC International	
	Context for the table so the reader understands what exactly they are looking at:		template and	
II. HCV	Should probably make it clear that the dataset background and reference information is contained later in the		includes references	
Assessment	document. I was incensed going through this wondering where these phantom data sets were to be found until I		to all data sources	Faanamia
Framework	later found the section discussing and referencing each one.		used.	Economic
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
	Explanatory for the Framework: Many of suggested impacts on Priority T&E Species and Critical Biodiversity		HCV is threatened	
	Areas are not controlled or influenced by wood procurement organizations that are FSC Certificate Holders.		by forest	
	Many of these potential threats are heavily influenced by larger societal issues involving the public, large public		management.	
	land management agencies and others. For example, altered fire regimes, grazing, development pressures and		Additionally, the	
I .				
j	lack of management are not influenced by FSC Certificate Holders. Even logging practices, construction of forest		scale of risk	
III. HCV 1 - Species Diversity				

			1	1
			to make it easier	
			for CHs to	
			determine if there	
			are areas of	
			specified risk	
			within their supply	
			chains.	
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			_	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
			to make it easier	
			for CHs to	
			determine if there	
			are areas of	
			specified risk	
			within their supply	
	The High Conservation Value (HCV) Guidance does not clearly recognize and state certain HCV species require		chains. The Control	
	active management to maintain their habitats. Longleaf pine forests, bottomland hardwoods, early		Measures include	
	successional neotropical migratory birds, red cockaded woodpeckers, and gopher tortoises are just a small		collaborative	
	sample of the forest types and species that benefit from active forest management, including harvesting. Many		dialogues to	
	wildlife and plant species, including some that are federally listed, G1 or G2 ranked or are otherwise considered		determine a suite	
	rare or uncommon depend on early successional stage habitats or habitats created by active forest management.		of appropriate	
	Some, like the gopher tortoise, readily seek open canopy areas where sunlight hits the forest floor and		mitigation	
	stimulates growth of herbaceous species. Many highly desirable bottomland hardwood species, such as the red		activities to	
	or white oak species groups, must have opening in the canopy to ensure successful regeneration. The guidance		address threats to	
	as drafted seems to automatically place wood from these forest types or species habitats in the "high risk"		an HCV that is	
3.1 HCV 1 Def. &	category. Forest landowners who have management plans in place for these type habitats or species should not		designated as	
Guidance	be considered a high risk source of wood.		specified risk.	Economic
_		The IC guidance is to write	This wording has	-
		control measures and	been removed	
		standards that are written	from the second	
		using the SMART acronym.	draft of the NRA.	
		If the control measure or	This draft includes	
	Wording on shovel logging and BMP implementation appears in many spots where no data has been proven to	standard cannot follow this	a much greater	
	highlight that this is actually an issue on the ground. Until data is supported in a sufficient manner the wording	and be supported by peer	level of	
	should be removed. This insertion method during standards development is counterproductive to building trust	reviewed scientific	documentation	
	within the certificate holder basis and is creating additional unnecessary negative opinions during a crucial time	literature, language should	and rationale	
	where the standards are in the process of being developed.	be revised or removed.	provided for the	
			risk designations,	
3.1 HCV 1 Def. &	Cape fear arch: IP is concerned with Stakeholder (opinions) comments directing whether or not shovel logging is	HCV section 3.3.1 remove	including an	
	1 , , , , , , , , , , , , , , , , , , ,			Economic
Guidance	an issue in Pocosin/Carolina Bays. Logging by itself should not change regeneration.	BMP wording	assessment of	Economic

			T	
			whether or not the	
		Cape fear arch: Remove the	HCV is threatened	
		reference to stakeholder	by forest	
		perspective.	management.	
			The methodology	
			for identifying	
			individual species	
			changed from	
			expert opinion to	
			the more	
			systematic	
			approach that uses	
			the NatureServe	
			database and	
			assessing the	
			threats to each	
			species from forest	
			management	
			activities. The	
			resulting list of	
			species is quite	
	In addition, there are concerns about habitat protections for salmon in states like Oregon where the forestry		different than that	
3.1 HCV 1 Def. &	rules are weak. See section 9.1. In that case, reliance on BMPs and other state measures are insufficient control		included in the first	
Guidance	measures.		draft.	Environmental
			The methodology	
			for identifying	
			individual species	
			changed from	
			expert opinion to	
			the more	
			systematic	
			approach that uses	
			the NatureServe	
			database and	
			assessing the	
			threats to each	
			species from forest	
			management	
			activities. The	
			resulting list of	
			species is quite	
	RMS strongly encourages FSC to clearly focus on how forest management and third party certified acres can		different than that	
	promote habitat for "Priority Threatened and Endangered Species", rather than using their presence as a		included in the first	
	criteria for "high risk " wood. The list provided in the NRA runs the gamut from species that utilize mature		draft. The Control	
	forests (spotted owls and marbled murrelets) to those that require young forest conditions (Kirklands's Warbler)		Measures do not	
	to those that require clean water (Anadromous Salmoids) to those that need canopy openings and herbaceous		include specific	
	vegetation (gopher tortoise). Many working forests are managed for wood and wood products AND for habitat		requirements,	
	for these and other species in need of conservation attention. To blanket use these or any other species as an		rather there will be	
	automatic criteria for "high risk" wood will very clearly have unintended consequences of additional costs and		a collaborative	
	barriers for private working forest owners that could lead to adverse changes in land tenure or land use. A much		dialogue where a	
3.2 Identification	better path forward is one that encourages landowners to manage lands for rare species, rather than creating		suite of mitigations	
of HCV1	disincentives for land ownership and use.		will be developed.	Economic
	Very odd that HCV 1 – critical biodiversity areas – appears to be a very broad circle in a portion of northern		These areas were	
3.2 Identification	California in our footprint. Are these the hexagons discussed in the TNC report?		determined by the	
	· · · · · · · · · · · · · · · · · · ·		· ·	Economic
of HCV2			Critical Biodiversity	Economic

		<u> </u>		
	I would like a list of experts consulted and their background. It is not at all transparent to say, "we consulted		Areas Dataset that	
	experts."		identifies areas	
			with high	
			concentrations of	
			rare species. These	
			areas were then	
			assessed to	
			determine if they	
			are being	
			threatened by	
			forest	
			management. This	
			methodology, and	
			therefore results,	
			remains	
			unchanged in the	
			second draft of the	
			NRA, although	
			additional	
			documentation	
			and rationale have	
			been provided.	
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			CMs include the	
			use of regional	
			collaborative	
			dialogues that will include all	
	Due to the lack of analysis and justification for the major expansion of Specified Risk Areas into private lands that		include all interested	
	, , , , , , , , , , , , , , , , , , , ,			
	have not agreed to participate in the FSC Standards program, FSC US would be well served to retract its		stakeholders,	
3.2 Identification	proposed US National Risk Assessment, conduct an adequate economic and practical analysis and more		including non- certified	
	effectively engage FSC Certificate Holders, suppliers, and private landowners that it seeks to regulate in a more		landowners.	Economic
of HCV3 3.2 Identification	inclusive and open dialogue. Our procurement organization does not have technical expertise in identifying critical biodiversity areas. We		Thank you for your	LCOHOIIIC
	, , , , , , , , , , , , , , , , , , , ,			Economic
of HCV4	have chosen not to comment on this question at this time. The National Rick Assessment (NRA) identified Critical Ricdiversity Areas based on a species richness index	The NRA could be	comment. The second draft of	Economic
	The National Risk Assessment (NRA) identified Critical Biodiversity Areas based on a species richness index			
	developed by NatureServe and The Nature Conservancy (Chaplin et al. 2000). The analysis by Chapin et al.	strengthened by discussing	the NRA includes a	
	(2000) identified concentrations of "biodiversity" based on occurrences from NatureServe of 2,800 rare species	the extent to which uneven	much greater level	
	in the U.S., weighting each species proportional to its range.	survey effort for element	of documentation	
2.2 Idon###==#	The NaturaCome element engineere data available count information about about the section of the countries	occurrences and	and rationale	
3.2 Identification	The NatureServe element occurrence data provides sound information about observations of rare species.	occurrences of non-forest	provided for the	F:
of HCV5	However, the database and the analysis have certain limitations. For example, there have been no uniform	species may have influenced	risk designations,	Economic

	surveys for rare species across the nation. Thus, the geographic distribution of element occurrences is influenced	the delineation of Critical	including an	
	by survey effort and additional observations may remain undiscovered due to a lack of surveys. Also, as the NRA	Biodiversity Areas.	assessment of	
	acknowledges, the index based on these data is influenced by non-forest species. Although, the National Risk	<u>-</u>	whether or not the	
	Assessment presents no information about the extent of that influence it concludes that, "in areas that are	The NRA could be	HCV is threatened	
	predominantly forested or forest matrix it should be representative of biodiversity per HCV1." The NRA presents	strengthened by describing	by forest	
	no test of this assumption.	the regional experts who	management.	
		selected the Priority	These areas were	
	The NRA states that Priority Habitats in Critical Biodiversity Areas "were identified in part through consultation	Habitats in the Critical	determined by the	
	with regional experts," and that "Priority habitats were selected based on habitat types that were determined to	Biodiversity Areas, and the	Critical Biodiversity	
	be representative of the biodiversity associated with the area." However, the NRA presents no information	methods they used.	Areas Dataset that	
	about the regional experts who selected the areas or the methods and criteria that they used. Based on the	methous they used.	identifies areas	
	methods used to identify the Critical Biodiversity Areas, readers of the NRA are led to assume that the Priority	The NRA could be	with high	
	Habitats were selected because they support unusual concentrations of rare species. However, no evidence of	strengthened by describing	_	
	this relationship is presented. For which species are the Priority Habitats important? Identifying these		concentrations of	
		the regional experts who	rare species. These	
	relationships would greatly strengthen the NRA.	selected the Priority	areas were then	
		Habitats in the Critical	assessed to	
		Biodiversity Areas, and the	determine if they	
		methods they used.	are being	
			threatened by	
			forest	
			management. This	
			methodology, and	
			therefore results,	
			remains	
			unchanged in the	
			second draft of the	
			NRA, although	
			additional	
			documentation	
			and rationale have	
			been provided and	
			the focus has	
			shifted to the	
			entire CBA rather	
			than specific	
			habitats within the	
			CBA.	
 			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			These areas were	
	Critical Biodiversity Areas: Descriptions of the Priority Habitats identify "potential" threats that are unsupported		determined by the	
	by citations from the peer reviewed scientific literature and appear speculative. Terms such as "potential" and		Critical Biodiversity	
3.2 Identification	"may" appear numerous times with respect to "threats." Some of these potential threats are clearly		Areas Dataset that	
of HCV6	unsupported by scientific information.		identifies areas	Economic

			with high	
			concentrations of	
			rare species. These	
			areas were then	
			assessed to	
			determine if they	
			are being	
			threatened by	
			forest	
			management. This	
			methodology, and	
			therefore results,	
			remains	
			unchanged in the	
			second draft of the	
			NRA, although	
			additional	
			documentation	
			and rationale have	
			been provided and	
			the focus has	
			shifted to the	
			entire CBA rather	
			than specific	
			habitats within the	
			CBA.	
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			These areas were	
			determined by the	
	Priority Habitats: The NRA states that Priority Habitats in Critical Biodiversity Areas "were identified in part		Critical Biodiversity	
	through consultation with regional experts," and that "Priority habitats were selected based on habitat types		Areas Dataset that	
	that were determined to be representative of the biodiversity associated with the area." However, the NRA		identifies areas	
	presents no information about the regional experts who selected the areas or the methods and criteria that they		with high	
	used. Based on the methods used to identify the Critical Biodiversity Areas, readers of the NRA are led to		concentrations of	
	assume that the Priority Habitats were selected because they support unusual concentrations of rare species.		rare species. These	
	However, no evidence of this relationship is presented.		areas were then	
	The Priority Habitats do not appear to align with an established ecosystem classification system. Furthermore,		assessed to	
	descriptions in the NRA of some Priority Habitats do not contain sufficient detail to facilitate identification in the		determine if they	
	field. Because they are within Critical Biodiversity Areas identified based on element occurrence data from		are being	
	NatureServe, a logical approach would have been to identify Priority Habitats using NatureServe Ecological		threatened by	
	Systems (Comer et al. 2003) or U.S. National Vegetation Classification Alliances or Associations (Jennings et al.		forest	
3.2 Question for	2009). Such an alignment would allow a list of associated rare species to be developed and would enhance the		management. This	
Consultation	ability of forest managers to identify these Priority Habitats.		methodology, and	Economic
2300001011		L		_300

		1		
			therefore results,	
			remains	
			unchanged in the	
			second draft of the	
			NRA, although	
			additional	
			documentation	
			and rationale have	
			been provided and	
			the focus has	
			shifted to the	
			entire CBA rather	
			than specific	
			habitats within the	
			CBA.	
			The methodology	
			for identifying	
			individual species	
			changed from	
			expert opinion to	
			the more	
			systematic	
		More on this list later, but I		
		•	approach that uses	
		certainly don't think you	the NatureServe	
		covered an expansive list of	database and	
		T and E species that meet	assessing the	
		this criteria – seems these	threats to each	
		were cherry-picked – oddly,	species from forest	
		3 of the 6 species were from	management	
		the Pacific Coast! I had no	activities. The	
		idea 50% of the country's	resulting list of	
		most priority T and E species	species is quite	
		were found in my region –	different than that	
3.2 Question for		and all of them in California.	included in the first	
Consultation	Priority T and E species	Wow!	draft.	Economic
Consultation	Friority Failu E species	wow:		LCOHOITIC
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
	State or federally listed threatened or endangered species lists are readily available for public access through		HCV is threatened	
	online databases. The broad geographic designations of specified risk and required control measures will impose		by forest	
	significant, unwarranted cost and require resources not readily available to certificate holders, landowners and		management. FSC	
	loggers. It will be difficult for certificate holders to monitor and enforce this requirement, given the number of		_	
	1 , 9		US' intent is to	
	small private landowners in the United States. To identify critical biodiversity areas at the FMU level, certificate		provide resources	
	holders will need resources such as staff experts, government agency consultation, or utilize services of		to assist CHs in	
	contractor biologists, ecologists specializing in plants and wildlife. Most certificate holders do not have technical		determining	
3.2 Question for	expertise in identifying critical biodiversity areas without contacting outside technical resources at significant		whether or not an	
Consultation	cost.		HCV is present	Economic

		Γ		
		within	n their supply	
		area.		
3.2 Question for	Our procurement organization does not have technical expertise in identifying critical biodiversity areas. We	Thanl	k you for your	
Consultation	have chosen not to comment on this question at this time.	comn		Economic
		The s	econd draft of	
		the N	RA includes a	
			greater level	
			cumentation	
			ationale	
			ded for the	
		·	esignations,	
			ding an	
			sment of	
			her or not the	
			s threatened	
		by for		
			gement.	
			e areas were	
			mined by the	
			al Biodiversity	
			Dataset that	
			ifies areas	
		with I	high	
		conce	entrations of	
		rare s	pecies. These	
	The Priority Habitats do not appear to align with an established ecosystem classification system. Furthermore,	areas	were then	
	descriptions in the NRA of some Priority Habitats do not contain sufficient detail to facilitate identification in the	asses	sed to	
	field. Because they are within Critical Biodiversity Areas identified based on element occurrence data from	deter	mine if they	
	NatureServe, a logical approach would have been to identify Priority Habitats using NatureServe Ecological	are be	eing	
	Systems (Comer et al. 2003) or U.S. National Vegetation Classification Alliances or Associations (Jennings et al.	threa	tened by	
	2009). Such an alignment would allow a list of associated rare species to be developed and would enhance the	forest	t	
	ability of forest managers to identify these Priority Habitats.	mana	gement. This	
		meth	odology, and	
	Descriptions of the Priority Habitats identify "potential" threats that are unsupported by citations from the peer-		fore results,	
	reviewed scientific literature and appear speculative. Terms such as "potential" and "may" appear numerous	remai		
	times in Section 3.3.1 with respect to "threats." Some of these potential threats are clearly unsupported by	uncha	anged in the	
	scientific information. For example, in the description of Pocosins/ Carolina Bays in the Cape Fear Arch, the NRA		nd draft of the	
	states that "Some stakeholder perspective that 'shovel-logging' of these mesic sites may result in undesirable		although	
	regeneration." However, the NRA presents no technical basis for this perception.	additi		
			mentation	
	Similarly, the description of "Montane Longleaf Pine" suggests that the use of forest herbicides will potentially		ationale have	
	harm biodiversity although studies such as Iglay et al. (2014) have shown that herbicides can be used to maintain		provided and	
	high levels of understory plant diversity.		ocus has	
	inglifered of understory plant diversity.		ed to the	
	The NRA suggests that sedimentation from forest management activities is a threat to biodiversity values in the		CBA rather	
	Apalachicola Bay/River System in the Florida Panhandle and in the Oachita River Valley. However, the NRA		specific	
2.2 Question for			•	
3.2 Question for	presents no evidence to support these assertions, which contrast with the fact that the overall rate of implementation of forestry best management practices		ats within the	Economic
Consultation	implementation of forestry best management practices	CBA.	a a t b a d a l = :	Economic
			nethodology	
			entifying	
			dual species	
			ged from	
	The priority Threatened & Endangered species are federally listed, and therefore already afforded legal	exper	t opinion to	
3.2 Question for	protection under the Endangered Species Act. Procurement managers are knowledgeable of the ESA	the m	nore	
Consultation	requirements and the addition of control measures is of questionable value.	system	matic	Economic

			and the state of t	
			approach that uses	
			the NatureServe	
			database and	
			assessing the	
			threats to each	
			species from forest	
			management	
			activities. The	
			resulting list of	
			species is quite	
			different than that	
			included in the first	
			draft.	
			The second draft of	
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			These areas were	
			determined by the	
			Critical Biodiversity	
			•	
		Ciarra Narrada Carradia ara	Areas Dataset that	
		Sierra Nevada:Compliance	identifies areas	
	Sierra Nevada Mixed Conifer Stands Control Measure: Compliance with CA Forest Practice Rules and SFI Fiber	with CA Forest Practice	with high	
	Sourcing indicators should be sufficient to ensure compliance.	Rules and SFI Fiber Sourcing	concentrations of	
		indicators should be	rare species. These	
	Coastal Prairies and Montane Meadows Control Measure: Requirement to conduct surveys is ill defined and	sufficient to ensure	areas were then	
	onerous	compliance.	assessed to	
			determine if they	
	Mixed Conifer Klamath-Siskiyou Control Measure: Area currently adapted to lo-mid fire severity and frequency.	Klamath Siskiyou:	are being	
	Compliance with existing BMPs and Oregon Forest Practice Act should be sufficient to ensure compliance.	Compliance with existing	threatened by	
		BMPs and Oregon Forest	forest	
	Aguatic Habitats Southern Appalachians Control Measure: Cahaba River watershed is the center of the	Practice Act should be	management. This	
	biodiversity hotspot. Compliance with existing BMPs should be adequate to ensure compliance.	sufficient to ensure	methodology, and	
	Secure 500, incorpora compilance with existing 500 3 should be ducquate to ensure compilance.	compliance.	therefore results,	
	Bibb County Glades Southern Appalachians Control Measure: Area is already protected. Located within the TNC	compliance.	remains	
	Bibb County Glades Preserve which is located within Cahaba River National Refuge.	Southorn Ann Acustics		
	BIBB Country Glades Freserve within is located within Canaba river inational refuge.	Southern App. Aquatics:	unchanged in the	
	Landard Dira Hakitata Cantal Manayana Biadiyanita yaladida ada ada ada ada ada ada ada ada ad	Compliance with existing	second draft of the	
	Longleaf Pine Habitats Control Measures: Biodiversity value driven in part by understory plant community.	BMPs should be adequate to	NRA, although	
	Where landowners choose to maintain longleaf pine ecosystems is a landowner decision. Current systems can	ensure compliance.	additional	
	be protected by existing regulatory and non-regulatory rules and guidelines.		documentation	
		Bibb County GladesLocated	and rationale have	
	Apalachicola Bay and Steephead ravine along Apalachicola River System- Current compliance with relevant state	within the TNC Bibb County	been provided and	
	BMPS protect both systems.	Glades Preserve which is	the focus has	
		located within Cahaba River	shifted to the	
3.2 Question for	Pine Flatwoods Control Measure: Compliance with state forestry and wildlife BMPs and SFI Fiber Sourcing rules	National Refuge and have	entire CBA rather	
Consultation	should be adequate to ensure compliance.	sufficient protection	than specific	Economic
	, control of the cont	p		***************************************

			habitats within the CBA.	
		Longleaf Pine: Adequately protected under existing regulatory and non-regulatory rules and guidelines.		
		Apalachicola Bay & Steephead Ravines: Current compliance with relevant state BMPS protect both systems.		
		Pine Flatwoods Compliance with state forestry and wildlife BMPs and SFI Fiber Sourcing rules should be adequate to ensure compliance.		
3.2 Question for Consultation	Appvion does not currently have technical expertise in identifying critical biodiversity areas. We have chosen not to comment on this question at this time.		Thank you for your comment	Economic
	The selection of endangered species that are vertebrates, directly affected by forest management is an unusual	Selection of "darling species	The methodology for identifying individual species changed from expert opinion to the more systematic approach that uses the NatureServe database and assessing the threats to each species from forest management activities. The resulting list of species is quite different than that	
3.2 Question for Consultation	inclusion. How will new science or facts derived from future studies be included in a risk assessment? Will the CWWW update the NRA annually as companies have done to their own risk assessments in the past?	or landscapes" should be eliminated from the NRA.	included in the first draft.	Economic
	The NRA states that the list of Priority Threatened and Endangered species was developed based on the following criteria: • State or Federally-listed Threatened or Endangered species • Vertebrates		The methodology for identifying individual species changed from expert opinion to	
	 Commonly recognized as being a keystone species, indicator species, or otherwise representative of a given forested landscape Global Rarity Forest-dependent 		the more systematic approach that uses the NatureServe	
3.3 HCV1 Risk Designation	Directly affected by forest practices However, NRA acknowledges that the list of selected species is inherently value driven and based in part on		database and assessing the	Economic

	stakeholder input. Because of the subjective nature of the selection process, it is not possible to develop a list of	threats to each	
	"the most appropriate species." The Priority Threatened & Endangered Species all are federally listed and, thus,	species from forest	
	already are afforded protections of the Endangered Species Act. Thus, managers are already cognizant of the	management	
	need to minimize risk of "take," copious guidelines from federal and state agencies already exist, and the added	activities. The	
	value of the Control Measures is unclear. There is even the possibility that the Control Measures could conflict	resulting list of	
	with federal and state rules and regulations.	species is quite	
	Other Control Measures require actions which may be beyond the capacity of individual landowners. For	different than that	
	example, the Control Measures for Kirkland's warbler suggest than land owners should "conduct harvest	included in the first	
	operations in a manner sufficient to maintain the distribution and extent of mid-seral Jack Pine (aged 6-22 years)	draft.	
	across the landscape." However, individual landowners may have limited area of Jack Pine forest on their land	urait.	
	· · · · · · · · · · · · · · · · · · ·		
	and no data on the age-class distribution of Jack Pine across the landscape or intentions of other landowners.		
	Thus, landowners may be unable to implement the proposed Control Measure for this species.		
		The second draft of	
		the NRA includes a	
		much greater level	
		of documentation	
		and rationale	
		provided for the	
		risk designations,	
		including an	
		assessment of	
		whether or not the	
		HCV is threatened	
		by forest	
		,	
		management.	
		These areas were	
		determined by the	
		Critical Biodiversity	
		Areas Dataset that	
		identifies areas	
		with high	
		concentrations of	
		rare species. These	
		areas were then	
		assessed to	
		determine if they	
		are being	
		threatened by	
		forest	
		management. This	
		methodology, and	
		therefore results,	
		remains	
		unchanged in the	
		second draft of the	
		NRA, although	
	The Critical Biodiversity Areas identified as high risk priority habitats fail to take into account many of these	additional	
	habitats are established, maintained and protected from conversion to other uses because they are managed as	documentation	
	working forests, and fail to recognize millions of acres in these areas are third party certified to either the SFI or	and rationale have	
	ATF standards which should gualify wood from those forests as low risk. Certainly, many of the Critical	been provided and	
	Biodiversity Areas are important from a biodiversity standpoint. However, the Risk Assessment fails to clearly	the focus has	
	recognize working forests can and do protect biodiversity values within them, and a blanket "high risk"	shifted to the	
3.3 HCV1 Risk	designation will have significant unintended consequences by taking away incentives to keep these working	entire CBA rather	
	forests in forested conditions.		Economic
Designation	iorests in rorested Conditions.	than specific	ECOHOHIIC

			halatana . 100 to 0	<u> </u>
			habitats within the	
			CBA.	
		The best option here is to		
		simply put in a control		
		measure that states		
		montane meadows and	The second draft of	
		coastal prairies will not be	the NRA includes a	
		planted with conifers. I think	much greater level	
		expecting controlled	of documentation	
		material providers to	and rationale	
		MANAGE these stands to	provided for the	
		maintain their status via	risk designations,	
		burning or harvest	including an	
		(controlled burning can be a	assessment of	
		very difficult issue to	whether or not the	
		manage in many areas;	HCV is threatened	
		especially within the	by forest	
		Wildland-Urban interface;	management.	
		also, the Forest Practice	Additionally, the	
		Rules in California are only	scale of risk	
		now being changed to allow	designations has	
		exemptions for managing	been reevaluated	
		meadows so that conifers	to make it easier	
		can be harvested without	for CHs to	
		replanting – which is what	determine if there	
	It's unclear but I think the part of Mendocino county that fits in the critical biodiversity area on the map is	you are asking for here). I'm	are areas of	
	considered part of the California coastal prairies and montane meadows section. But I'm a bit challenged here			
2 2 UCV4 Biok	· · · · · · · · · · · · · · · · · · ·	jumping ahead – will get to this more in the control	specified risk	
3.3 HCV1 Risk	since 3.2.1.1 mentioned that only "forest associated" biodiversity was considered. Seems an overreach for	measures section.	within their supply	Faanamia
Designation	controlled wood to require controlled wood suppliers to MANAGE prairies and montane meadows.	measures section.	chains.	Economic
			The methodology	
			for identifying	
			individual species	
			changed from	
			expert opinion to	
			the more	
			systematic	
			approach that uses	
			the NatureServe	
			database and	
			assessing the	
			threats to each	
			species from forest	
			management	
			activities. The	
			resulting list of	
	Oregon Wild also supports identified Priority Threatened and Endangered Species, especially northern spotted		species is quite	
	owl, marbled murrelet, and listed anadromous salmon. Listed Bull trout should also be added to the list. Other		different than that	
3.3 HCV1 Risk	forest-dwelling species that should be recognized include: Pacific fisher (proposed for listing), Humboldt marten		included in the first	
Designation	(may be warranted), and the North Coast Range DPS of the dusky red tree vole (warranted but precluded).		draft.	Environmental
_	The critical biodiversity areas seem to be primarily based on water quality issues. Broad levels of BMP		The second draft of	
	compliance are generally in place and are shown to be effective to control the impacts of timber harvesting on		the NRA includes a	
	these issues. It is important that the NRA keep separate the impacts of timber harvesting and other activities on		much greater level	
	these ecosystems. The report notes that erosion and sedimentation from poor practices is the primary threat		of documentation	
3.3 HCV1 Risk	from timber harvesting. This may be true, but numerous studies and annual reviews have also shown that		and rationale	
Designation	erosion and sedimentation from timber harvesting does not have a significant impact on the water quality in		provided for the	Economic
Designation	Crosion and scannentation from timber harvesting does not have a significant impact on the water quality in		provided for the	LCOHOITIC

				I
	these regions. These areas are being impacted by forces outside of the forest products industry. Where it has		risk designations,	
	been shown that timber harvesting does not significantly impact the water quality values associated with these		including an	
	forest types, they should be removed from the NRA. The "values based" portion of this appears lopsided. This		assessment of	
	effort needs to be scientifically based and include the values of the companies operating in these regions and the		whether or not the	
	people that live and work there.		HCV is threatened	
			by forest	
			management.	
			_	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
			to make it easier	
			for CHs to	
			determine if there	
			are areas of	
			specified risk	
			within their supply	
			l .	
			chains.	
	Central California:			
	Sierra Nevada mixed conifer stands: good			
	Klamath – Siskiyou:			
	Mixed Conifer Stands: good		The second draft of	
	Southern Appalachians:		the NRA includes a	
	Aquatic Labitats - are explained well. Along with associated issues with forest management, i.e.		much greater level	
	sedimentation.		of documentation	
	Glades - this one is written like someone has a personal issue with it. "Potentially harmed by logging" and		and rationale	
	other activities that "may not recognize the values" are not specific enough to include in this type of		provided for the	
	classification. The other definitions point to specific practices and reasons those practices should be limited.		risk designations,	
	Montane Longleaf - also well-reasoned and specifics given for threats to diversity.		including an	
	Florida Panhandle:		assessment of	
	Longleaf pine habitats – good. Just like Montane		whether or not the	
	Apalachicola Bay/river system: also good and well-reasoned.		HCV is threatened	
3.3 HCV1 Risk	Steephead ravines - no reason in terms of issues like sedimentation. Again, like the Glades, nothing is listed.		by forest	
Designation	What are the potential threats from management? (specifically)		management.	Economic
	Central Florida:			
	• Pine Flatwoods – good.			
	<u> </u>			
	Cape Fear Arch:			
	Pocosins/Carolina Bays – most bays have a large cypress component, with some pine overstory, seems "shovel			
	logging" is the sole reason identified as creating undesirable vegetation and does not present a sound ecological			
	risk due to management.			
	Ouachita River Valley:			
	Aquatic Habitats: good			
	Central Appalachians:			
	Karst Habitats: Sedimentation seems to be the driving factor; which is hard to control with the soils and terrain			
	in this region, but can be reduced with proper implementation of BMPs and monitoring by forest managers.			
	The control Measures outlined in the draft NRA for species listed under the federal Endangered Species Act	Re-evaluate the six species	The methodology	
	appear to be limited to six specific species, but the reasons for identifying these species are not given. The	designated and explain why		
		,	for identifying	
	current CW standard does not go to the species-specific level, both on its face and as applied in the existing risk	existing law, conservation	individual species	
	assessments. (Note that Weyerhaeuser benchmarked all of the risk assessments covering our supply areas,	agreements, and other	changed from	
	which cover all of the southern US and western US and Canada.) The reasons are that individual species do not	programs are not adequate	expert opinion to	
	rise to the global/regional/national level of concern relevant under the CW standard, and that timber purchasers	to address risk in the US.	the more	
	can address the risks by expecting compliance with the Endangered Species Act (ESA) and conservation	Explain the basis for	systematic	
	agreements and incentive programs in the US. This means purchasers are not asked to enforce a different level	decisions so that auditors	approach that uses	
3.3 HCV1 Risk	of protection themselves through their supply chains. If these reasons are no longer valid to find low risk then	can defend them in the face	the NatureServe	
Designation	the NRA should explain why. And in doing so, it will be important to explain how the list nevertheless is limited to	of complaints, and so	database and	Economic
Pesignation	the tries should explain why. And in doing so, it will be important to explain how the list nevertheless is illilited to	or complaints, and so	database and	LCOHOITIC

	The control The control Controlled Ward and the U.S. Controlled Ward and the C	forder construction		
	six species. The proposed Controlled Wood standard will allow for a much longer and open-ended list of "High	landowners and other	assessing the	
	Conservation Values," and the standard has many opportunities for stakeholder complaints and appeals. When	participants know what to	threats to each	
	these occur, how will FSC auditors defend the decisions in the NRA? Without a strong statement of defensible	expect as they evaluate	species from forest	
	criteria, what species are covered and what landowners must do is left unclear and vulnerable to challenge.	whether to participate in the	management	
		CW system.	activities. The	
			resulting list of	
			species is quite	
			different than that	
			included in the first	
			draft.	
			The Priority Forest	
			Types were	
			developed by the	
			NRA WG using the	
			US FM standard as	
			guidance, along with additional	
			input from	
			stakeholders.	
			These areas were	
			then assessed to	
			determine if they	
	Descriptions of the Priority Habitats identify "potential" threats that are unsupported by citations from the peer-		are being	
	reviewed scientific literature and appear speculative. Terms such as "potential" and "may" appear numerous		threatened by	
	times in Section 3.3.1 with respect to "threats." Some of these potential threats are clearly unsupported by		forest	
	scientific information. For example, in the description of Pocosins/ Carolina Bays in the Cape Fear Arch, the NRA		management.	
	states that "Some stakeholder perspective that 'shovel-logging' of these mesic sites may result in undesirable			
	regeneration." However, the NRA presents no technical basis for this perception. Recent research by Kimberly		The methodology	
	Bohn and Matthew Cohen (School of Forest Resources and Conservation, University of Florida) recently		for identifying	
	evaluated plant communities in forested wetlands following mat logging, when conducted in accordance with		individual species	
	Florida best management practices. The authors found that mat-logging BMP's clearly reduced extent and		changed from	
	impact of skid trails on soil displacement, rutting, and microtopography. They also found that mat-logged sites		expert opinion to	
	appeared to have similar species composition to reference wetland sites and with more cypress stems in		the more	
	dominant positions. A publication from this research project is under development. Similarly, the description of		systematic	
	"Montane Longleaf Pine" suggests that the use of forest herbicides will potentially harm biodiversity although		approach that uses	
	studies such as Iglay et al. (2014) have shown that herbicides can be used to maintain high levels of understory		the NatureServe	
	plant diversity. The NRA suggests that sedimentation from forest management activities is a threat to		database and	
	biodiversity values in the Apalachicola Bay/River System in the Florida Panhandle and in the Oachita River Valley.		assessing the	
	However, the NRA presents no evidence to support these assertions, which contrast with the fact that the		threats to each	
	overall rate of implementation of forestry best management practices in Florida during 1997 – 2011 ranged from		species from forest	
	96% to 99% (Southern Group of State Foresters 2012), with implementation rates likewise being high elsewhere.		management	
			activities. The	
	The NRA provides no description of which rare species are to be addressed by the Control Measures. It also is		resulting list of	
	unclear how Control Measures for some Priority Habitats can be implemented. For example, forest harvesting		species is quite	
	by definition alters stand-level structure and, as a result, associated plant and animal communities change. Yet,		different than that	
3.3 HCV1 Risk	the Control Measure for Sierra Nevada Mixed Conifer Stands in California and Mixed Conifer Stands in the		included in the first	
Designation	Klamath-Siskiyou recommend that stand-level species and structural diversity be maintained over time.		draft.	Economic
	Lack of Criteria to Limit Priority Forest Types and Species-Specific Control Measures. The new FSC procedures		The Priority Forest	
	(FSC-PRO-60-002 and 60-002a) are quite detailed about the broad range of information that must be considered		Types were	
	in an NRA. With regard to High Conservation Value Forests (HCVFs), for example, FSC-PRO-60-002a spells out a		developed by the	
	detailed list of ecological factors that must be considered. The draft NRA arrives at various conclusions and risk		NRA WG using the	
	designations for HCVFs. And while some of the conclusions appear to be reasonable, the draft NRA does not		US FM standard as	
	adequately explain how the elements in FSC-PRO-60-002a were evaluated. Without an explanation of this		guidance, along	
3.3 HCV1 Risk	methodology the draft NRA is susceptible to challenge, and participants cannot anticipate how additional risk		with additional	
	designations may be made in the future. This creates significant risk for participating companies who rely on the			Economic
Designation	designations may be made in the future. This creates significant risk for participating companies who rely on the		input from	Economic

		Ι	T
	NRA. The draft NRA should "show its work" and better articulate how its conclusions meet the prescriptive	stakeholders.	
	requirements of FSC-PRO-60-002 and 60-002a.	These areas were	
		then assessed to	
		determine if they	
		are being	
		threatened by	
		forest	
		management.	
		The methodology	
		for identifying	
		individual species	
		changed from	
		expert opinion to	
		the more	
		systematic	
		approach that uses	
		the NatureServe	
		database and	
		assessing the	
		threats to each	
		species from forest	
		management	
		activities. The	
		resulting list of	
		species is quite	
		different than that	
		included in the first	
		draft.	
		The Priority Forest	
		Types were	
		developed by the	
		NRA WG using the	
		US FM standard as	
		guidance, along	
		with additional	
		input from	
		stakeholders.	
		These areas were	
		then assessed to	
		determine if they	
		are being	
		threatened by	
		forest	
		management.	
	Appvion is concerned that the NRA provides no description of which rare species are to be addressed by the	The methodology	
	Control Measures in priority habitats. Vague Control Measures such as "maintain structural diversity and stand-	for identifying	
	level species" are not implementable and would be next to impossible to monitor and evaluate effectiveness of	individual species	
	measures.	changed from	
		expert opinion to	
	The list contains foderally identified threatened and endangered energies beginn to be consisting to be being		
	The list contains federally-identified threatened and endangered species known to be sensitive to habitat	the more	
0.01101/4.51.1	modification and thus to forest management activities consistent with the criteria in 3.2.1.3. Most lands	systematic	
3.3 HCV1 Risk	managed in regions where these species are found are managed to protect the species or their habitats,	approach that uses	
Designation	including many of the Control Measures in Section IX.	the NatureServe	Economic

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			database and	
			assessing the	
			threats to each	
			species from forest	
			management	
			activities. The	
			resulting list of	
			species is quite	
			different than that	
			included in the first	
			draft.	
			The second draft of	
			the NRA includes a	
			much greater level	
			•	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
			designations has	
			been reevaluated	
			to make it easier	
		Allow participants to follow	for CHs to	
		state forest & wildlife	determine if there	
		assessments/strategies in	are areas of	
	Who or what body determines that these are affected adversely by forest management? i.e Many debates take	which they have a voice in	specified risk	
3.3 HCV1 Risk	place about bat populations being affected by forest management when science shows that it improves habitat	developing with their local	within their supply	
Designation	suitability.	forestry/wildlife agency.	chains.	Economic
Designation	Suitability.	Torestry, whathe agency.	These areas were	LCOHOIIIC
			determined by the	
			•	
			Critical Biodiversity	
			Areas Dataset that	
			identifies areas	
			with high	
	Priority Habitats: The NRA states that Priority Habitats in Critical Biodiversity Areas "were identified in part		concentrations of	
	through consultation with regional experts," and that "Priority habitats were selected based on habitat types		rare species. These	
	that were determined to be representative of the biodiversity associated with the area." However, the NRA		areas were then	
	presents no information about the regional experts who selected the areas or the methods and criteria that they		assessed to	
	used. Based on the methods used to identify the Critical Biodiversity Areas, readers of the NRA are led to		determine if they	
	assume that the Priority Habitats were selected because they support unusual concentrations of rare species.		are being	
	However, no evidence of this relationship is presented.		threatened by	
	The Priority Habitats do not appear to align with an established ecosystem classification system. Furthermore,		forest	
3.3 Question for	descriptions in the NRA of some Priority Habitats do not contain sufficient detail to facilitate identification in the		management. The	
Consultation	field. Because they are within Critical Biodiversity Areas identified based on element occurrence data from		second draft of the	
Critical	NatureServe, a logical approach would have been to identify Priority Habitats using NatureServe Ecological		NRA analyzes the	
Biodiversity and	Systems (Comer et al. 2003) or U.S. National Vegetation Classification Alliances or Associations (Jennings et al.		CBAs as a whole	
species	2009). Such an alignment would allow a list of associated rare species to be developed and would enhance the		rather than	
desginations	ability of forest managers to identify these Priority Habitats.		individual habitats	Economic
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		1		
			within the CBAs,	
			recognizing that	
			the habitats	
			contribute to the	
			biodiversity of	
			these areas.	
			Additional	
			documentation to	
			support the	
			justification and	
			rationale for the	
			risk designations	
			has been provided.	
			These areas were	
			determined by the	
	RMS has management authority for significant lands in the following "high risk priority habitats" and offers these		Critical Biodiversity	
	comments specific to them:		Areas Dataset that	
	1. Aquatic habitats in the Southern Appalachians: RMS agrees river systems such as the Cahaba River in		identifies areas	
	Alabama are home to an exceptional array of species and biodiversity; however, water quality and aquatic		with high	
	habitats in many of these river systems are well protected by forest Best Management Practices (BMPs). For		concentrations of	
	forest landowners and managers including RMS, whose lands are certified to a credible forest certification		rare species. These	
	system, BMP compliance is mandatory, and is highly effective in protecting water quality.		areas were then	
	Bibb County Glades (i.e. rock outcrops) are not traditional logging areas and are easily protected during forest		assessed to	
	management and harvesting operations. The simple presence of a rock outcropping in a working forest should		determine if they	
	not automatically place all wood from that forest in the high risk category.		are being	
	3. Longleaf pine habitats in the Florida Panhandle: RMS Strongly disagrees that wood from managed longleaf		threatened by	
	pine forests in the Florida panhandle or elsewhere in the southern US should be considered a Critical Biodiversity		forest	
	Area and thus "high risk". Longleaf pine forest acreage, and associated longleaf pine habitats is increasing in the		management. The	
	southern United States, and a primary reason for this increase is the ability of private forest owners to realize an		second draft of the	
	economic return from wood, straw, recreation, and ecosystem values associated with longleaf. RMS is actively		NRA analyzes the	
	working to increase acres of longleaf on lands we manage in this region, and the ability to manage and harvest		CBAs as a whole	
	longleaf pine trees for high quality wood products is one of the major drivers in our longleaf restoration efforts.		rather than	
	If wood from these forests is labeled high risk, and any of our primary customers unable to purchase that wood,		individual habitats	
	it will create a significant disincentive for us, and for other private landowners, to continue longleaf restoration		within the CBAs,	
	efforts across the species' historic range.		recognizing that	
	4. Apalachicola Bay / river system: RMS strongly disagrees with the statement "Biodiversity is potentially		the habitats	
	threatened from sedimentation of the river system, including from forest management activities". Forestry		contribute to the	
	BMPs have been documented by dozens of independent studies as being highly effective in protecting water		biodiversity of	
	quality. Many forest landowners in the Apalachicola drainage are certified to one of the three major forest		these areas.	
	certification systems; for these landowners, BMP compliance is mandatory. A review of literature available on		Additional	
3.3 Question for	the internet in a search for "Apalachicola River System causes of sedimentation or water quality degradation"		documentation to	
Consultation	failed to yield a single study where forest management or harvesting activity was a major source of		support the	
Critical	sedimentation or water quality degradation to the Apalachicola. Singling out forest management activity as a		justification and	
Biodiversity and	potential cause of sedimentation and resulting loss of aquatic biodiversity seems to be more reflective of		rationale for the	
species	stakeholder bias rather than scientific fact. We believe FSC standards and risk assessments should be based on		risk designations	
desginations	science rather than bias for or against certain activities.		has been provided.	Economic
	5. Cape Fear Arch : Pocosins and Carolina bays and their potential exposure to "shovel logging" are singled out as			
	"high risk" areas. This is a broad statement, again with perhaps unintended consequences. RMS agrees that			
	some pocosins and Carolina bays with an intact natural forest component, or very wet in nature are areas of high			
	biodiversity concentrations that should be protected. RMS, as well as other forest landowners certified to one of			
	the three forest certification schemes, typically do protect these type areas during ongoing forest management			
	and harvesting activities. Other "pocosins" and "Carolina bays" are actively managed forests, now supporting			
	their fourth or even fifth rotation of actively managed working pine forests. These areas may be logged by			
	tradition methods when conditions merit, or by "shovel logging" when conditions are wetter. Shovel logging			
	seems to have a negative connotation in the NRA, when in fact shovel logging can be extremely effective in			

	protecting site productivity and water quality. Further, pocosins and bays can be extremely large in size and owned by multiple small landowners. For these individuals, placing all wood from these forest types in the high risk category could effectively take much of the value of their forests away, and thus promote conversion of these forests to other uses. In this area, the Critical Biodiversity Area designation should focus on naturally intact and significant pocosins and Carolina bays, rather than be applied with a broad brush. 6. Ouachita River Valley – RMS again takes strong exception to the statements: Biodiversity in the Ouachita headwaters is largely driven by freshwater biodiversity. Many BMPs in the region are voluntary, and higher implementation rates are a straightforward way to enhance aquatic biodiversity values." Much of the Ouachita River headwaters and watershed is either in public ownership, or private ownership that has certified its forest management activities to one of three standards, thereby mandating BMP adherence and compliance. RMS has no idea how designation as a Critical Biodiversity Area will lead to "higher implementation rates" of BMP compliance. Further, an internet literature search on Ouachita River sedimentation and pollution sources" fails to cite a single study where forest management activities are considered to be a significant source of sedimentation in the Ouachita River system. Rather, numerous studies in this region demonstrate forestry BMPs are highly effective at protecting water quality. Again, RMS sees this as another instance the focus should be on certifying more acres to one of the three certification systems, rather than being punitive toward wood from currently certified forests.			
3.3 Question for Consultation Critical Biodiversity and species desginations	Priority T and E species – no bats, no mammals? I did a quick search on USFWS website and state ESA websites and found many species in northeast states that meet the proposed criteria. Why were they not included? This is an incredibly short list and again – 3 of the 6 species listed are found in the coastal redwood region of northern California. Some examples of other species Atlantic Salmon (Gulf of maine)? Canada lynx? Gray wolf? Peregrine falcon? Golden Eagle? Box Turtle (listed in Maine)? Indiana bat? NSO: NSO description does not accurately describe the NSO population in northern California that is thriving in managed timberlands. In northern California, NSOs are doing best on managed timberlands – so the definition just does not fit here as there are very limited late successional forests on these forestlands – yet somehow the population is doing reasonably well.	Need to review list. It appears to me that there are many more species that should be included that weren't. Either provide criteria that fit only these 6 species or revise list so all species that fit the criteria are included. Is the environmental community really happy with this list? NSO: Add, "Additionally, NSOs can thrive in younger forests managed for timber harvest where they typically nest in stands with dense canopy, large trees, and existing nest structures."	The methodology for identifying individual species changed from expert opinion to the more systematic approach that uses the NatureServe database and assessing the threats to each species from forest management activities. The resulting list of species is quite different than that included in the first draft.	Economic
3.3 Question for Consultation Critical Biodiversity and species desginations	RCW are known to also use loblolly pine as habitat. The guidance mentions longleaf pine savannahs, so is the list inclusive, or not? Meaning, do RCW in loblolly pine stands require control measures? Also, how would a procurement company participate in a safe harbour program?	Clarification is needed regarding the applicability of the list of control measures.	The methodology for identifying individual species changed from expert opinion to the more systematic approach that uses the NatureServe database and assessing the threats to each species from forest management activities. The resulting list of species is quite	Economic

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Critical modification and thus to forest management activities consistent with the criteria in 3.2.1.3. Most lands Biodiversity and managed in regions where these species are found are managed to protect the species or their habitats,	3.3 Question for		restrictive	
Biodiversity and managed in regions where these species are found are managed to protect the species or their habitats,	Consultation	The list contains federally-identified threatened and endangered species known to be sensitive to habitat	requirements for	
	Critical	modification and thus to forest management activities consistent with the criteria in 3.2.1.3. Most lands	non-certified	
	Biodiversity and	managed in regions where these species are found are managed to protect the species or their habitats,	landowners.	
	T			
desginations measures for Listed Anadromous Salmonids are particularly concerning due to the high cost of expert actions will be Economic	·	1	-	Economic
	Consultation Critical Biodiversity and species	The list contains federally-identified threatened and endangered species known to be sensitive to habitat modification and thus to forest management activities consistent with the criteria in 3.2.1.3. Most lands managed in regions where these species are found are managed to protect the species or their habitats, including many of the Control Measures in Section IX. While not present in Evergreen's wood basket, the control	restrictive requirements for non-certified landowners. Rather, a suite of	

	consultants and extending protection areas beyond those designated in regulatory forest practices acts	identified through	
	administered by state regulatory agencies. Wood suppliers are not under the control of the consuming mills.	a collaborative	
	Developing customized BMPs for all listed and major tributary streams is unrealistic.	dialogue at a	
		regional meeting.	
		The methodology	
		for identifying	
		individual species	
		changed from	
		expert opinion to	
		the more	
		systematic	
		approach that uses	
		the NatureServe	
		database and	
		assessing the	
		threats to each	
		species from forest	
		management	
		activities. The	
		resulting list of	
		=	
		species is quite	
		different than that	
		included in the first	
		draft.	
		The Control	
		Measures in the	
		second draft of the	
		NRA do not	
		explicitly include	
		restrictive	
	Many of the specified priority habitats in Critical Biodiversity Areas are the focus of private (ENGO), state,	requirements for	
	and/or federal conservation and/or regulatory programs. While likely to already be implementing practices	non-certified	
	consistent with most of the specified control measures, landowners not already committed to certifying their	landowners.	
	lands under FSC are unlikely to agree to inspections or written commitments to implement the measures. The	Rather, a suite of	
	Company is not in the position to be an enforcement agent for federal and state regulatory agencies. The NRA	actions will be	
	states that Priority Habitats in Critical Biodiversity Areas "were identified in part through consultation with	identified through	
	regional experts," and that "Priority habitats were selected based on habitat types that were determined to be	a collaborative	
	representative of the biodiversity associated with the area." However, the NRA presents no information about	dialogue at a	
	the regional experts who selected the areas or the methods and criteria they used. Based on the lack of	regional meeting.	
	information about how the Critical Biodiversity Areas were identified, readers of the NRA are left to assume that		
	the Priority Habitats were selected because they support unusual concentrations of rare species. However, no	The methodology	
	evidence of this relationship is presented. For which species are the Priority Habitats important? Identifying	for identifying	
	these relationships provides information that can strengthen the scientific rigor of the NRA and provide public	individual species	
	commenters with information necessary to assess the proposed control measures.	changed from	
		expert opinion to	
	The list contains federally-identified threatened and endangered species known to be sensitive to habitat	the more	
	modification and thus to forest management activities consistent with the criteria in 3.2.1.3. Most lands	systematic	
	managed in regions where these species are found are managed to protect the species or their habitats,	approach that uses	
3.3 Question for	including many of the Control Measures in Section IX.	the NatureServe	
Consultation		database and	
Critical	The control measures for Listed Anadromous Salmonids are particularly concerning due to the high cost of	assessing the	
Biodiversity and	expert consultants and extending protection areas beyond those designated in regulatory forest practices acts	threats to each	
species	administered by state regulatory agencies in the Northwest. Wood suppliers are not under the control of the	species from forest	
desginations	consuming mills. Developing customized BMPs for all listed and major tributary streams is unrealistic.	management	Economic

		activities. The	
		resulting list of	
		species is quite	
		different than that	
		included in the first	
		draft.	
		These areas were	
		determined by the	
		Critical Biodiversity	
		Areas Dataset that	
		identifies areas	
		with high	
		concentrations of	
		rare species. These	
		areas were then	
		assessed to	
		determine if they	
		are being	
		threatened by	
		forest	
		management. The	
		second draft of the	
		NRA analyzes the	
		CBAs as a whole	
		rather than	
		individual habitats	
		within the CBAs,	
		recognizing that	
		the habitats	
		contribute to the	
		biodiversity of	
		these areas.	
		Additional	
		documentation to	
		support the	
		justification and	
		rationale for the	
		risk designations	
		has been provided.	
		The methodology	
		for identifying	
		individual species	
		changed from	
		expert opinion to	
		the more	
		systematic	
		approach that uses	
		the NatureServe	
3.3 Question for		database and	
Consultation	Yes the identified ecosystems represent the biodiversity in the specific areas, the control measures are realistic	assessing the	
Critical	and attainable. They are also auditable by regional experts and foresters with knowledge of best management	threats to each	
Biodiversity and	practices.	species from forest	
species		management	
desginations	Species identified are accurate based on my knowledge, control measures are realistic and attainable.	activities. The	Economic

				T
			resulting list of	
			species is quite	
			different than that	
			included in the first	
			draft.	
			The methodology	
			for identifying	
	The NRA states that the list of Priority Threatened and Endangered species was developed based on the		individual species	
	following criteria:		changed from	
			expert opinion to	
	State or Federally-listed Threatened or Endangered species		the more	
	Vertebrates		systematic	
	Commonly recognized as being a keystone species, indicator species, or otherwise representative of a given		approach that uses	
	forested landscape		the NatureServe	
	Global Rarity		database and	
	Forest-dependent		assessing the	
	Directly affected by forest practices		threats to each	
			species from forest	
	However, NRA acknowledges that the list of selected species is inherently value driven and based in part on	The NRA could be	management	
3.3 Question for	stakeholder input. Because of the subjective nature of the selection process, it is not possible to develop a list of	strengthened by recognizing	activities. The	
Consultation	"the most appropriate species." The Priority Threatened & Endangered Species all are federally listed and, thus,	that regulatory mechanisms	resulting list of	
Critical	already are afforded protections of the Endangered Species Act. Thus, managers are already cognizant of the	already in place in the	species is quite	
Biodiversity and	need to minimize risk of "take," copious guidelines from federal and state agencies already exist, and the added	United States to conserve	different than that	
species	value of the Control Measures is unclear. There is even the possibility that the Control Measures could conflict	threatened and endangered	included in the first	
desginations	with federal and state rules and regulations.	species.	draft.	Economic
acogacions	man read at the state rates and regulations.	species.	The methodology	20011011110
			for identifying	
			individual species	
			changed from	
		We do not object to the	expert opinion to	
		inclusion of this species, as it	the more	
		could potentially be	systematic	
		negatively affected if harvest	approach that uses	
		were to occur during the	the NatureServe	
		nesting season.	database and	
		Additionally, since almost all	assessing the	
		known nesting locations	threats to each	
		occur on FSC certified or	species from forest	
		Federal lands, it will be	management	
3.3 Question for		reasonably easy for a	activities. The	
Consultation		company to obtain	resulting list of	
Critical		documentation confirming	species is quite	
Biodiversity and	We find the choice of Kirtland's Warbler in this context to be somewhat interesting. It does meet all of the	that that harvests were done	different than that	
species	criteria listed in 3.2.1.3, including that it is "Directly affected by forest practices." However, in general, it is far	in a way that protects the	included in the first	
desginations	more positively affected by forest practices than negatively affected by them.	species.	draft.	Economic
	Parametry and the control of t		The methodology	
			for identifying	
			individual species	
			changed from	
3.3 Question for			expert opinion to	
Consultation			the more	
Critical			systematic	
Biodiversity and	The priority Threatened & Endangered species are federally listed, and therefore already afforded legal		approach that uses	
species	protection under the Endangered Species Act. Procurement managers are knowledgeable of the ESA		the NatureServe	
desginations	requirements and the addition of control measures is of questionable value.		database and	Economic
uesgiiiatiUlis	requirements and the addition of control measures is of questionable value.		udiavase dilu	LCOHOHHC

			assessing the	
			threats to each	
			species from forest	
			management	
			activities. The	
			resulting list of	
			species is quite	
			different than that	
			included in the first	
			draft.	
		RCW: Current T&E		
		requirements for not having		
		a "take" of RCW are		
		sufficient protection		
		including US Fish and		
		Wildlife Service recovery		
		•	The methodeless	
		plans already in place.	The methodology	
	The Date of The standard of States and Controlled States and Contr	Contraction C	for identifying	
	The Priority Threatened & Endangered Species all are federally listed and, thus, already are afforded protections	Gopher Tortise: Current	individual species	
	of the Endangered Species Act. Existing guidelines from federal and state agencies already exist and should be	activities aimed at	changed from	
	recognized as sufficient control measures	mechanical disturbance	expert opinion to	
	Red Cockaded Woodpecker: Current T&E requirements for not having a "take" of RCW are sufficient protection	avoidance around burrows	the more	
	including US Fish and Wildlife Service recovery plans already in place.	are sufficient	systematic	
	Gopher Tortoise Control Measure: Control measures should only apply in gopher tortoise range where federally		approach that uses	
	listed as threatened. Current activities aimed at mechanical disturbance avoidance around burrows are	NSO: Acknowledge existing	the NatureServe	
	sufficient. "	protections already in-place	database and	
		to provide nesting, foraging	assessing the	
	Northern Spotted Owl Control Measure: Complex set of regulations related to preservation of habitat already in	and dispersal habitats.	threats to each	
	effect through Pacific Northwest.	•	species from forest	
		Anadramous Salmonid: FSC	management	
3.3 Question for	Anadramous Salmonids Control Measure: The control measure is an attempt to impose the FSC Forest	should rely on	activities. The	
Consultation	Management Standard indirectly through FSC Chain of Custody Certificate Holders and independent suppliers.	implementation of State	resulting list of	
Critical	Meeting water quality temperature standards is not an auditable measure and therefore impractical as a control	forest management	species is quite	
Biodiversity and	measure	regulations which has	different than that	
species	FSC should rely on implementation of State forest management regulations which has adequately addressed this	adequately addressed this	included in the first	
desginations	concern.	concern.	draft.	Economic
desginations	concern.	concern.	These areas were	LCOHOITIC
			determined by the	
			Critical Biodiversity	
			Areas Dataset that	
			identifies areas	
			with high	
			concentrations of	
			rare species. These	
			areas were then	
			assessed to	
			determine if they	
			are being	
			threatened by	
3.3 Question for			forest	
Consultation	Many of the specified priority habitats in Critical Biodiversity Areas are the focus of private (ENGO), state, and/or		management. The	
Critical	federal conservation and/or regulatory programs. While likely to already be implementing practices consistent		second draft of the	
Biodiversity and	with most of the specified control measures, landowners not already committed to certifying their lands under		NRA analyzes the	
species	FSC are unlikely to agree to inspections or written commitments to implement the measures. Appyion is not in		CBAs as a whole	
desginations	the position to be an enforcement agent for federal and state regulatory agencies.		rather than	Economic
acaginations	The position to be an emoternent agent for reactal and state regulatory agenties.		rather thall	LCOHOITHC

	T	1	ı	
			individual habitats	
			within the CBAs,	
			recognizing that	
			the habitats	
			contribute to the	
			biodiversity of	
			these areas.	
			Additional	
			documentation to	
			support the	
			justification and	
			rationale for the	
			risk designations	
			has been provided.	
			These areas were	
			determined by the	
			Critical Biodiversity	
			Areas Dataset that	
			identifies areas	
			with high	
			concentrations of	
			rare species. These	
			areas were then	
			assessed to	
			determine if they	
			are being	
			threatened by	
			forest	
			management. The	
			second draft of the	
			NRA analyzes the	
			CBAs as a whole	
			rather than	
			individual habitats	
			within the CBAs,	
			recognizing that	
			the habitats	
			contribute to the	
		Contact the longleaf alliance	biodiversity of	
		to get their view on the	these areas.	
		ICUN listing of this species.	Additional	
3.3 Question for		Management for longleaf	documentation to	
Consultation	Recognizing that the commercial use of longleaf is beneficial for the tree species in that it provides incentives to	pine is not so clear and clean	support the	
Critical	plant and conserves the symbiotic species such as gopher tortoise and the indigo snake. Conversion to other	cut. Issue suggested control	justification and	
Biodiversity and	types of forest or to non-forest is of course bad.	measures with room for	rationale for the	
species	Control measures for longleaf are appropriate but native range and management techniques can be argued (i.e.	adjustment based on site	risk designations	
desginations	prescribed burning liability near road ways do not allow its growth).	location.	has been provided.	Economic
IV. HCV 2 -				
Landscapes				
4.1 HCV 2 Def. &				
Guidance				
4.2 HCV 2				
Identification				

4.3 HCV 2 Risk	T			
Designation				
V. HCV 3 -				
Ecosystems &				
Habitats				
5.1 HCV 3 Def. &				
Guidance				
			A list of experts is	
			included in the	
		Please add an addendum	second draft of the	
		with a list of experts and	NRA as required by	
		their expertise consulted –	the FSC	
5.2 HCV 3		which pieces of the NRA	International	
Identification	Regional experts were consulted. Who?	they provided expertise on.	template.	Economic
5.2 HCV 3	Oregon Wild strongly supports unmapped Areas of Specified Risk including "HCV3: Areas of primary forest and	they provided expertise on	Thank you for your	20011011110
Identification	Old Growth forest, that are on publically-owned [sic] lands in the Rocky Mountain or Pacific Coast regions."		comment	Environmental
Tacific medical	on drown forest, that are on passically owned [step lands in the nocky mountain or racine coast regions.		The second draft of	Liiviioiiiieitai
			the NRA includes a	
			much greater level	
			of documentation	
			and rationale	
			provided for the	
			risk designations,	
			including an	
			assessment of	
			whether or not the	
			HCV is threatened	
			by forest	
			management.	
			Additionally, the	
			scale of risk	
	The new FSC procedures (FSC-PRO-60-002 and 60-002a) are quite detailed about the broad range of information		designations has	
	that must be considered in an NRA. With regard to High Conservation Value Forests (HCVFs), for example, FSC-		been reevaluated	
	PRO-60-002a spells out a detailed list of ecological factors that must be considered. The draft NRA arrives at		to make it easier	
	various conclusions and risk designations for HCVFs. And while some of the conclusions appear to be reasonable,		for CHs to	
	the draft NRA does not adequately explain how the elements in FSC-PRO-60-002a were evaluated. Without an		determine if there	
	explanation of this methodology the draft NRA is susceptible to challenge, and participants cannot anticipate		are areas of	
	how additional risk designations may be made in the future. This creates significant risk for participating	Samo as above relative to	specified risk	
5.2 HCV 3	companies who rely on the NRA. The draft NRA should "show its work" and better articulate how its conclusions	Same as above, relative to other HCV topics beyond	within their supply	
Identification	meet the prescriptive requirements of FSC-PRO-60-002 and 60-002a.	T&E species.	chains.	Economic
5.2 Question for	meet the prescriptive requirements of 150-1 NO-00-002 and 00-002a.	TGL Species.	Citalitis.	Leonomic
Consultation				
CONSCILLATION			The second draft of	
			the NRA designates	
			specified risk for	
			old growth forests	
			on publically-	
	Primary Forest Control Measure: Harvest of primary forest on public land in the Inland West and Pacific		owned lands in the	
	Northwest would be an extremely rare event. Current protections are sufficient.		Pacific Coast and	
	The state of the s	Acknowledge the broad	Rocky Mountain	
	Old Growth Control Measure: Given the definition of Old Growth that was pre-colonial in nature there is	levels of protection already	regions that are	
	considerable concern that datasets used for analysis are inadequate for determination. The draft document	in-place throughout the	not protected (as	
5.3 HCV 3 Risk	inappropriately determines protection levels for old growth. Old Growth and Primary Forest Control Measures	Inland West and Pacific	demonstrated by	
Designation	addressing private lands should be dropped due to serious legal issues.	Northwest.	GAP Status 1 and 2	Economic
Designation	addicessing private iairus sirodia be dropped due to seriods iegai issues.	INOI LIIWESL.	Oni Status I aliu Z	LCOHOITIC

			anne in the USCS	
			areas in the USGS	
			PAD US dataset).	
			The Priority Forest	
			Types were	
			developed by the	
			NRA WG using the	
			US FM standard as	
			guidance, along	
			with additional	
			input from	
			stakeholders.	
			These areas were	
			then assessed to	
			determine if they	
			are being	
			threatened by	
			forest	
	Recognition of all species or habitats on the IUCN Red List as high risk is not warranted in the United States. A		management.	
	significant case in point is longleaf pine. In 2014, the IUCN determined longleaf pine forests in the southern		Additional	
	United States as a threatened species; a determination made that appears to ignore a positive trend in acres in		documentation to	
	longleaf and the need for markets for longleaf pine as an incentive for landowners to establish longleaf. For FSC		support the	
	to consider wood and fiber from longleaf forests as high risk only creates a barrier to continued expansion of		justification and	
	longleaf pine acres across the US South. We strongly urge FSC to clearly identify longleaf pine from sustainably		rationale for the	
5.3 HCV 3 Risk	managed forests as low risk, thus encouraging private forest landowners to establish longleaf pine as a viable		risk designations	
Designation	economic forest cover type.		has been provided.	Economic
			Thank you for your	
			comment. In the	
			second draft of the	
			NRA, the glossary	
			has been aligned	
		The definition in the glossary	with the glossary in	
5.3 HCV 3 Risk	4.3.2 3rd paragraph: "For the sake of the Controlled Wood Risk Assessment, "old growth" refers to late-	does not match the FM	the FSC US FM	
Designation	successional forests that fit the FM definition of old growth, and are pre-colonial in nature."	definition? Which way is it?	Standard.	Economic
	g		The Priority Forest	
			Types were	
			developed by the	
			NRA WG using the	
			US FM standard as	
			guidance, along	
			with additional	
			input from	
			stakeholders.	
			These areas were	
			then assessed to	
		Dofining Priority Forest		
	The NIPA states that the Driggity Egreet Types were developed based on the ESC LIC Forest Management list	Defining Priority Forest	determine if they	
	The NRA states that the Priority Forest Types were developed based on the FSC US Forest Management list,	Types based on a	are being	
	guidance from Proforest, and additional stakeholder input. The NRA again acknowledges that "These Priority	classification system such as	threatened by	
	Forest Types and associated Control Measures are inherently value-driven, and are based on stakeholder input	NatureServe Ecological	forest	
	and the Forest Management list of regionally important ecosystems." As with Priority Habitats, the Priority	Systems (Comer et al. 2003)	management.	
	Forest Types do not appear to align with an established ecosystem classification system. Defining Priority Forest	or U.S. National Vegetation	Additional	
	Types based on a classification system such as NatureServe Ecological Systems (Comer et al. 2003) or U.S.	Classification Alliances or	documentation to	
	National Vegetation Classification Alliances or Associations (Jennings et al. 2009) would strengthen the NRA.	Associations (Jennings et al.	support the	
5.3 HCV 3 Risk	One advantage of using Associations is that they have been assigned conservation ranks using a consistent and	2009) would strengthen the	justification and	
Designation	unbiased approach.	NRA.	rationale for the	Economic

				T.
			risk designations	
			has been provided.	
			The second draft of	
			the NRA does not	
			include separate	
			control measures	
			for old growth	
			forests and does	
		Primary Forest: Current	not identify	
		protections are sufficient.	specific mitigation	
		•	actions within the	
		Old Growth Control	control measures.	
	Primary Forest Control Measure: Harvest of primary forest on public land in the Inland West and Pacific	Measure: Acknowledge the	Rather, a suite of	
	Northwest would be an extremely rare event. Current protections are sufficient.	broad levels of protection	actions will be	
	,	already in-place throughout	identified through	
	Old Growth Control Measure: Given the definition of Old Growth that was pre-colonial in nature there is	the Inland West and Pacific	a collaborative	
5.3 HCV 3 Risk	considerable concern that datasets used for analysis are inadequate for determination. The draft document	Northwest. Do not seek to	dialogue at a	
Designation	inappropriately determines protection levels for old growth.	apply to private lands	regional meeting.	Economic
Designation	mappropriatery actornines protection levels for old growth.	apply to private latius	The second draft of	Leonomic
			the NRA designates	
			specified risk for	
			old growth forests	
			on publically-	
			owned lands in the	
			Pacific Coast and	
			Rocky Mountain	
			regions that are	
			not protected (as	
			demonstrated by	
5.3.2 Question for			GAP Status 1 and 2	
Consultation Old	Old Growth and Primary Forest Control Measures addressing private lands should be dropped due to serious		areas in the USGS	
Growth	legal issues.		PAD US dataset).	Economic
			The Priority Forest	
			Types were	
			developed by the	
			NRA WG using the	
	RMS strongly disagrees with the criteria used for late successional bottomland hardwoods and native pine		US FM standard as	
	savannas in their designation as Priority Forest Types. Consideration of bottomland hardwoods that are 80		guidance, along	
	years of age as late successional and therefor Priority Forestry Types having specified risk is arbitrary and		with additional	
	capricious and not grounded in any scientific basis. Many forest owners are managing their bottomland		input from	
	hardwood forests for quality hardwood lumber, and overstory tree ages exceeding 80 years are very common in		stakeholders.	
	these situations. Further, to grow quality lumber shade intolerant tree species such as the red and white oak		These areas were	
	species groups or green and white ash require active forest management to remove less desirable species such		then assessed to	
	as box elder and beech, trees exhibiting poor growth form or quality, or to create openings for these shade		determine if they	
	intolerants to regenerate. These activities are considered normal forest management in these systems with an		are being	
	economic objective of a high value end product and secondary objectives of improving wildlife habitat. Tree		threatened by	
	species, site quality, soils, and landowner objectives dictate stand age to achieve this objective. If FSC places an		forest	
	arbitrary 80 year criteria in place as the threshold for late successional forests, the result for many bottomland		management.	
	forests will be they will be harvested for pulpwood or lower quality lumber or other wood products at ages		Additional	
	below 80 years.		documentation to	
			support the	
	Regarding longleaf pine savannas, our comments above relative to longleaf stand here as well. RMS encourages		justification and	
5.3.2 Question for	FSC to change the focus on Priority Forest Types as a driver for risk to a focus that includes Priority Forest Types		rationale for the	
Consultation Old	third party certified or being managed with a plan in place that incorporates biodiversity values of this forests as		risk designations	
Growth	low risk wood		has been provided.	Economic
	I to the state of		p. o aca.	

		Old growth redwood stands		
		on private lands are highly		
		protected within the current		
		regulatory framework. It is		
		highly unlikely for a permit		
		to be issued to harvest in a	The second draft of	
		Type I OG stand in California.	the NRA designates	
		.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	specified risk for	
		Old growth redwood stands	old growth forests	
		on private lands are highly	on publically-	
		protected within the current	owned lands in the	
		regulatory framework. It is	Pacific Coast and	
		highly unlikely for a permit	Rocky Mountain	
		to be issued to harvest in a	regions that are	
		Type I OG (or Type II beyond	not protected (as	
	Primary and old growth redwood forest in coast redwood stands ARE highly regulated by the current regulatory	what is allowed under	demonstrated by	
5.3.2 Question for	framework and I greatly disagree that they should have specified risk. I expect the risk of actually harvesting in a	current FSC standards, i.e.	GAP Status 1 and 2	
Consultation Old	Type I stand in California is much much lower than the risk of harvesting one of the last remnant such stands in	thin from below) stand in	areas in the USGS	
Growth	other (non-picked out) states.	California.	PAD US dataset).	Economic
			The second draft of	
			the NRA no longer	
			separately	
			categorizes	
			redwood stands	
			and designates	
			specified risk for	
			old growth forests	
			on publically-	
			owned lands in the	
			Pacific Coast and	
	Evergreen Packaging does not procure fiber from forests where redwood trees grow. However, compared to		Rocky Mountain	
	the vast extent of the redwood forest type (approximately 3 million acres), the remaining unprotected old-		regions that are	
	growth forests in the United States are not significant. Late successional stands are far more common, but		not protected (as	
	attempts to exclude these from harvest, even by voluntary market-based mechanisms such as forest		demonstrated by	
5.3.2 Question for	certification, are likely to be counter-productive.		GAP Status 1 and 2	
Consultation Old	Protecting other species (beyond redwood) would be quite challenging and is unrealistic. Is there any indication		areas in the USGS	
Growth	that this would advance conservation sufficient to justify the cost and challenges?		PAD US dataset).	Economic
Growen	that this would develoe conservation surface to justify the cost and chancinges.		The second draft of	Leonomic
			the NRA no longer	
			_	
			separately	
			categorizes	
			redwood stands	
			and designates	
			specified risk for	
			old growth forests	
	Private landowners in the redwood region have contributed to the protection of significant amounts of old-		on publically-	
	growth redwood forest. Absent programs to purchase and protect remaining old-growth redwood on private		owned lands in the	
	lands, it is not realistic to expect them to be protected with no compensation to the landowner. Compared to		Pacific Coast and	
	the vast extent of the redwood forest type (approximately 3 million acres) the remaining unprotected old-		Rocky Mountain	
	growth is not of significant size. Late successional stands are far more common, but attempts to exclude these		regions that are	
	from harvest, even by voluntary market-based mechanisms such as forest certification, are likely to be counter-		not protected (as	
	productive.		demonstrated by	
5.3.2 Question for	production.		GAP Status 1 and 2	
Consultation Old	Protecting other species (beyond Redwood) would be quite challenging and is unrealistic. Is there any indication		areas in the USGS	
				Economic
Growth	that this would advance conservation sufficient to justify the cost and challenges?		PAD US dataset).	Economic

_			T	,
			The second draft of	
			the NRA designates	
			specified risk for	
			old growth forests	
			on publically-	
			owned lands in the	
			Pacific Coast and	
			Rocky Mountain	
			regions that are	
			not protected (as	
			demonstrated by	
			GAP Status 1 and 2	
			areas in the USGS	
			PAD US dataset).	
			The rationale	
			behind the	
			decision to only	
			include public	
5.3.2 Question for	Old Growth protection should apply to private lands.		lands is	
Consultation Old	Each FMU needs to be evaluated individually to determine if all species or just the redwood component would		documented in	
Growth	qualify for old growth designation.		Annex E.	Economic
			The second draft of	
			the NRA no longer	
			separately	
			categorizes	
			redwood stands	
			and designates	
		FSC cannot take away the	specified risk for	
		rights of private landowners	old growth forests	
		to market their timber just	on publically-	
		because of its age. If timber	owned lands in the	
		species is not an RTE species	Pacific Coast and	
	It would be preferable for all old growth forest to be preserved should compensation to landowners occur. i.e.	then no one has a right to	Rocky Mountain	
	public schools get severance taxes lost from non-harvest on public lands, private landowners receive	take the value of their	regions that are	
	compensation for lost revenue or ecosystem services are valued more.		not protected (as	
	compensation for lost revenue or ecosystem services are valued more.	property. Landowner cannot		
		be publically blackballed	demonstrated by	
	Private landowners in the redwood region have contributed to the protection of significant amounts of old-	taking a landowner's	GAP Status 1 and 2	
	growth redwood forest. Absent programs to purchase and protect remaining old-growth redwood on private	traditional rights. FSC then	areas in the USGS	
	lands, it is not realistic to expect them to be protected with no compensation to the landowner. Compared to	would become a violator of	PAD US dataset).	
	the vast extent of the redwood forest type (approximately 3 million acres) the remaining unprotected old-	its own standard.	The rationale	
	growth is not of significant size. Late successional stands are far more common, but attempts to exclude these	Use educational	behind the	
	from harvest, even by voluntary market-based mechanisms such as forest certification, are likely to be counter-	opportunities to engage with	decision to only	
	productive.	landowners. Do not exclude	include public	
5.3.2 Question for		them due to the	lands is	
Consultation Old	Protecting other species (beyond Redwood) would be quite challenging and is unrealistic. Is there any indication	identification of "Old	documented in	
Growth	that this would advance conservation sufficient to justify the cost and challenges?	Growth."	Annex E.	Economic
	Riverbank areas of the St John River: The "upper St John" should be clarified. At minimum I would suggest			
	limiting the area to upstream from the town of Allagash. Below that point, there is a history of settlement and			
	farming close to the river. It is also worth noting that this area is nearly exclusively managed by major			
	landowners and has been under the jurisdiction of the State of Maine Land Use Planning Commission since the			
	mid 1970s.		This area is not	
		Question the need to	designated as	
	I started my career working in that area, and even in the mid- 1970s was aware of the sensitivity of the flood	include this given 40 years of	specified risk in the	
5.3.3 Priority	plain and riparian areas that could be special habitat with such plants as Furbush lousewart.	regulation by State of	second draft of the	
Forest Types		Maine.	NRA.	Economic
. 0. 000 . /pco				

	This is a highly regulated area, and as such I would consider it <i>low risk</i> .			
	This is a highly regulated area, and as such i would consider it iow risk.			
5.3.3 Priority	Bottomland Hardwoods: This definition is likely acceptable. Some references on how to ID these forests would be helpful. Native Longleaf: While the definition is ok, the designation of "native" also being planted could cause confusion. There are many efforts going on to restore longleaf pine in the southeast, but the goal of these efforts is also to make longleaf a commercial project to incentivize more planting of longleaf. Adding control measures to	Bottomland Hardwoods: Include references (or a map) so that companies can evaluate the risk that these forests are in their catchment Native longleaf: Could restoration projects be exempt from control measures if they are new	Additional documentation is provided to help CHs identify the Priority Forest Types. The second draft of the NRA does not identify specific mitigation actions within the control measures, rather a suite of actions will be identified through a collaborative dialogue at a	
Forest Types	restoration projects could hamper these efforts.	plantings as well?	regional meeting.	Economic
5.3.3 Priority Forest Types	The conservation values of concern are already protected by law and regulations. For example, the riparian areas and floodplain associated with the upper St. John's River in Maine are protected by Maine's Forest Practices Act and by the Land Use Planning Commission. The proposed control measures for the other types will be costly and would not be justified by the modest conservation gains.		This area is not designated as specified risk in the second draft of the NRA.	Economic
	Because Longleaf pine is increasing within the southeast due to many factors, and land is actively being recruited into the longleaf type, we feel that control measures should be oriented towards increasing awareness, recognizing indicators, and managing for T&E species that are present. The differentiation between native and newly recruited will blur over time. We are concerned with how priority forest habitats were chosen and the definitions provided. They have not been structured in a manner that translates well to the resource on the ground. Because these areas have not been defined with a scientific background or existing classification systems, rare species or indicator species cannot be used to assist in SMART control measures that aim towards good management of the resource. Characteristics of the HCV or PFT must be defined along with indicator species so that control measures can be attainable. The only way to bring credibility to this issue is to align peer reviewed research and ecosystem classifications that have already been published with the USNRA. Defining Priority Forest Types based on a classification system such as NatureServe Ecological Systems (Comer et al. 2003) or U.S. National Vegetation Classification Alliances or Associations (Jennings et al. 2009) would allow for attainable control measure design. One advantage of using Associations is that they have been assigned conservation ranks using a consistent and unbiased approach. Because Longleaf pine is increasing within the southeast due to many factors, and land is actively being recruited into the longleaf type, we feel that control measures should be oriented towards increasing awareness,	Align Priority forest types and control measures by referencing peer reviewed science that have occurred on characteristics and desired outcomes for HCV's and PFTs. This will allow for certificate holders to accurately gear monitoring and training to have an attainable outcome. Auditing methods will also easily align with this standards design. There is no current reasonable burden of proof that can be implemented for longleaf pine for certificate holders on a purchase by purchase basis and there will also be no auditing measurability given the current way the control measure is worded. The control measure should be written based on species management for GT and	The second draft of the NRA does not identify specific mitigation actions within the control measures, rather a suite of actions will be identified through a collaborative	
5.3.3 Priority Forest Types	recognizing indicators, and managing for T&E species that are present. The differentiation between native and newly recruited will blur over time.	RCW where they are found to occur both inside and	dialogue at a regional meeting.	Economic

		outside of language at aire		
		outside of longleaf pine		
		habitat.		
			Additional	
			documentation is	
			provided to help	
			CHs identify the	
			Priority Forest	
	We are concerned that listing Mesophytic cove sites as PFT will be confusing and un-auditable. Other than		Types. The second	
	foresters practicing in the region few have ever heard of Mesophytic coves. Certainly no loggers in the region		draft of the NRA	
	and few if any mill, concentration yard or land owners have. As defined by Lucy Braun the geographic area that		does not identify	
	is home to Mesophytic coves is immense, covering portions of ten states in the Central and Southern		specific mitigation	
	Appalachians. Because these sites are located on such an immense landscape they are by no means rare and		actions within the	
	many have some level of protection on public land in the region. Private non-industrial forest land owners who		control measures,	
	only sell timber once in their life time will have no interest in harvesting their timber in a way that "maintains		rather a suite of	
	natural stand diversity and structure consistent with this habitat type, including some retention of late-		actions will be	
	successional elements." Few if any of these landowners will even know if they have a Mesophytic cove site on	Suggest dropping	identified through	
	their property and most timber sales in the Appalachians still occur with no involvement from a professional	Appalachian Mesophytic	a collaborative	
5.3.3 Priority	forester. By listing Mesophytic Coves as a specified risk we are essentially stating that much of the Appalachians	Cove Sites from the Priority	dialogue at a	
Forest Types	need to be managed in much the same manner as an FSC certified tract is managed.	Forest Types.	regional meeting.	Economic
			Additional	
			documentation is	
			provided to help	
			CHs identify the	
			Priority Forest	
			•	
			Types. The second	
			draft of the NRA	
	Stands with mixed mesophytic characteristics are common throughout Appalachia and make up a significant		does not identify	
	portion of the procurement area of mills in the Appalachian region. They are home to some rare animal species	Due to the abundance of	specific mitigation	
	which are already provided protections through section 3.4.3 of the US National Risk Assessment.	mixed mesophytic forests	actions within the	
	The term "cove" (a recess or small valley in the side of a mountain) is vague, open to varied interpretations, and	within Appalachia and the	control measures,	
	would be difficult to audit consistently.	difficulty in auditing any	rather a suite of	
		requirement for "coves",	actions will be	
	1) Mixed mesophytic forests are abundant throughout Appalachia, and "cove" sites are difficult to define and	MWV suggests removing	identified through	
	audit.	"Mesophytic Cove Sites"	a collaborative	
5.3.3 Priority	2) The control measures requiring the maintenance of "stand structure" do not allow sufficient flexibility for	from the priority forest	dialogue at a	
Forest Types	timber harvesting or habitat maintenance for endangered species requiring early successional habitat.	types list.	regional meeting.	Economic
			Additional	
			documentation is	
			provided to help	
			CHs identify the	
			Priority Forest	
		A concerted off	Types. The second draft of the NRA	
		A concerted effort at		
		identification and protection	does not identify	
		of truly special areas,	specific mitigation	
		supported where necessary	actions within the	
		by appropriate	control measures,	
	Late successional bottomland hardwoods. The definition is very broad, and the 80 year age limit may well	compensation for owners	rather a suite of	
	incentivize owners to fell trees before they reach 80. This is a severe limit on management, and could limit the	and clear plans for	actions will be	
	availability of quality saw timber. The provision as written is more likely to promote felling of bottomland	subsequent management,	identified through	
	hardwoods before they reach 80 years, and divert older stands (those that may be most in need of sensitive	are far more likely to deliver	a collaborative	
5.3.3 Priority	management and harvesting) to markets with lower standards than FSC's. While it is clearly desirable to identify	an improved outlook for this	dialogue at a	
Forest Types	and retain these valuable forests, this recommendation does not do it.	type of forest.	regional meeting.	Economic
i orest rypes	and retain these valuable forests, this recommendation does not do it.	type or forest.	regional infecting.	Leonomic

			Additional	
			documentation is	
			provided to help	
			CHs identify the	
			Priority Forest	
			Types. The second	
			draft of the NRA	
			does not identify	
			•	
			specific mitigation	
			actions within the	
			control measures,	
			rather a suite of	
			actions will be	
5.3.3 Question for			identified through	
Consultation			a collaborative	
Priority Forest	The conservation values of concern are already protected by law and regulations. The proposed control		dialogue at a	
Types	measures will be costly and give only modest conservation gains.		regional meeting.	Economic
71			Additional	· · · · · ·
1			documentation is	
			provided to help	
			CHs identify the	
			Priority Forest	
			Types. The second	
			draft of the NRA	
			does not identify	
			specific mitigation	
			actions within the	
			control measures,	
			rather a suite of	
			actions will be	
5.3.3 Question for			identified through	
Consultation			a collaborative	
Priority Forest	The conservation values of concern are already protected by law and regulations. The proposed control		dialogue at a	
· · · · · · · · · · · · · · · · · · ·	measures for the other types will be costly and would not be justified by the modest conservation gains.		_	Economic
Types	measures for the other types will be costly and would not be justified by the modest conservation gains.		regional meeting.	ECOHOHIIC
			This area is not	
5.3.3 Question for		Given these strong control	designated as	
Consultation	The Saint John riverbanks are protected today by 250 foot regulated buffers. The St Francis Floodplain	measures that are already in	specified risk in the	
Priority Forest	(designated by MNAP) which is part of the Saint John River watershed has been an HCVF under J. D. Irving's FSC	place this area should really	second draft of the	
Types	certification for 5 years.	be considered low risk.	NRA.	Economic
			Additional	
			documentation is	
			provided to help	
			CHs identify the	
			Priority Forest	
			Types. The second	
			draft of the NRA	
			does not identify	
			specific mitigation	
			actions within the	
			control measures,	
5.3.3 Question for			rather a suite of	
Consultation			actions will be	
Priority Forest	All identified systems are regionally significant.		identified through	
Types	Adequate control measure have been identified.		a collaborative	Economic
/	4	l		,

			19.1	
			dialogue at a	
			regional meeting.	
			This area is not	
5.3.3 Question for	The conservation values of concern are already protected by law and regulations. For example, the riparian areas		designated as	
Consultation	and floodplain associated with the upper St. John's River in Maine are protected by Maine's Forest Practices Act		specified risk in the	
Priority Forest	and by the Land Use Planning Commission. The proposed control measures for the other types will be costly and		second draft of the	
Types	would not be justified by the modest conservation gains.		NRA.	Economic
. /			Roadless Areas are	
5.3.4 Question for	Other readless areas on federal lands that are greater than EOO acres		designated as Low	
	Other roadless areas on federal lands that are greater than 500 acres.	Da wat daalawata thaaa	_	
Consultation	- Hard to identify	Do not designate these	Risk in the second	
Roadless areas	- Harvesting under control of USFS and would be subject to review?	unmapped areas.	draft of the NRA.	Economic
			Roadless Areas are	
			designated as Low	
			Risk in the second	
			draft of the NRA.	
			Documentation	
			and rationale	
	The NRA should Protect Roadless Areas >1,000 acres.		behind this	
5.3.4 Question for	It's nice that the NRA recognizes inventoried roadless areas on the national forests. However, the USFS RARE II		designation are	
Consultation	dataset has problems that FSC should address. [Additional supporting information & citations provided		provided in Annex	
Roadless areas	supporting the expansion of roadless designation]		E.	Environmental
Moduless areas	supporting the expansion of roadiess designation]		Roadless Areas are	Liivii Oiliileiltai
5 2 4 O				
5.3.4 Question for			designated as Low	
Consultation			Risk in the second	
Roadless areas	The inclusion of additional roadless areas not already covered by federal designation is not justified.		draft of the NRA.	
			Roadless Areas are	
5.3.4 Question for			designated as Low	
Consultation	The inclusion of roadless areas under 5,000 acres is not justified or practical given the lack of sufficient data on		Risk in the second	
Roadless areas	smaller areas.		draft of the NRA.	Economic
	The inclusion of roadless areas under 5,000 acres is not justified or practical. Risk should not be designated on			
	Federal lands outside of Inventoried Roadless areas and Wilderness Study Areas. Federal lands are some of the			
	most heavily regulated areas for timber management in the nation, with laws including the National Forest			
	Management Act and National Environmental Policy Act. Timber sales are developed in accordance with forest			
	management plans and undergo rigorous environmental reviews, with stakeholder input and the opportunity for			
	parties to appeal the decisions made by the Forest Service and Bureau of Land Management, and ultimately,		Roadless Areas are	
5.3.4 Question for	challenge the decisions in court. FSC-US should rely on the system currently in place, and refrain from adding an		designated as Low	
Consultation	additional unnecessary and duplicative level of burden that could hinder the ability of these land managers to		Risk in the second	
Roadless areas	effectively manage and sustain our nation's public forests.		draft of the NRA.	Economic
Noduless alleas	effectively manage and sustain our nation's public forests.		+	LCOHOTTIC
5 2 4 Q			Roadless Areas are	
5.3.4 Question for			designated as Low	
Consultation	No. 2d. de 2. ce2. cele. 14 ce fell ce de cele. Cele. cele. cele. Cele. cele. cele. Cele. cele. Cele. cele. cele. cele. Cele. cele.		Risk in the second	
Roadless areas	No risk designation should not fall on the other federal roadless areas.		draft of the NRA.	
			Roadless Areas are	
5.3.4 Question for			designated as Low	
Consultation			Risk in the second	
Roadless areas	MWV believes that the acreage of roadless areas already identified and under protection are adequate.		draft of the NRA.	
VI. HCV 4 - Critical				
Ecosystem				
Services				
VII. HCV 5 -				
Community				
Needs				
VIII. HCV 6 -				
Cultural Values				
Cultural values				

		ı		T
	RMS strongly opposes control measures as outlined in Section 9, and we strongly believe they go beyond legal or			
	reasonable expected land management measures on private lands for these species or forest types. We ask you		HCV 6 has been	
	to give strong consideration to both the impact and net future result of implementing the control measures as		designated as Low	
	outlined in 9.1. You clearly state "Procurement policiesshall be designed and implement to avoid harm to the		Risk in the second	
	species where that species is 'known to occur'", yet you go on to dictate desired end conditions, habitats, and		draft of the NRA,	
	management activities. In multiple instances, these activities go far beyond what is required by the Endangered		therefore there are	
IX. Control	Species Act. In the sum of activities across the species range, does FSC really believe these control measures will		no associated	
Measures	expand species numbers or habitats?		control measures.	Economic
	Expert consultation is not realistic and the costs of performing on the ground surveys are prohibitive, current			
	federal and state agency jurisdiction and enforcement is sufficient. Restrictive requirements may cause			
	landowners to consider converting land to other uses as a response to the requirements. Expecting certificate			
	holders to insure that surveys and assessments of whether certain priority T&E species are present (known to			
	occur) on a site will be challenging. Landowners, suppliers or certificate holders would have to contract with		HCV 6 has been	
	wildlife experts, or request visits from regulatory agencies to survey for occurances. It is unlikely to gain		designated as Low	
	landowner cooperation for on-site surveys. Landowner incentive to protect would have to come through		Risk in the second	
	programs designed to reward the landowner for their efforts. The controlled wood standard is attempting to		draft of the NRA,	
	impose FSC forest management standards on suppliers and landowners who have no intention or desire towards		therefore there are	
IX. Control	certification to the FSC standards. Certificate holders would bear the burden of imposing FSC criteria on private		no associated	
Measures	land and independent contractors, or have to abandon otherwise valid sources of fiber supply.		control measures.	Economic
			HCV 6 has been	
	Expert Advice: For multiple control measures, FSC-US is proposing use of expert advice from outside consultants.		designated as Low	
	Many certificate holders have individuals on staff with the requisite knowledge and skills to serve as experts, yet		Risk in the second	
	they have been disqualified in the draft NRA for no clear reason. Presumably any experts utilized by certificate		draft of the NRA,	
	holders will be paid by them, continuing the same potential conflict that FSC-US is attempting to avoid by		therefore there are	
IX. Control	requiring outside experts. Forcing the use of outside experts also may affect the employment of company		no associated	
Measures	experts if they are unable to perform their duties due to FSC rules.		control measures.	Economic
			The methodology	
			for identifying	
			individual species	
			changed from	
			expert opinion to	
			the more	
			systematic	
			approach that uses	
			the NatureServe	
			database and	
			assessing the	
			threats to each	
			species from forest	
			management	
	We cite one specific example to support our position for a species with which we have significant management		activities. The	
	experience, the gopher tortoise in the context of the NRA language "Maintain native longleaf pine savanna per		resulting list of	
	Priority Forest Types". Yes, the gopher tortoise is historically a keystone species for longleaf pine and fire driven		species is quite	
	ecological systems. However, the gopher tortoise is also a species that thrives in loblolly or slash pine forests		different than that	
	that are managed primarily for economic objectives. Gopher tortoises are present in many loblolly stands that		included in the first	
	RMS manages, and they in fact are doing very well in those stands. Our management regime includes thinnings		draft. Gopher	
	and mid story release treatments that promote herbaceous growth, which is perhaps the real key to gopher		tortoise is no	
	tortoise presence. Our foresters and contract loggers are aware of active gopher tortoise colonies and burrows,		longer designated	
	and take appropriate steps to protect them during any mechanized forest operation. Native longleaf pine		as specified risk in	
9.1 HCV 1 -	savanna is not a requirement for gopher tortoise habitat, and the inference that we must provide this habitat		the second draft of	
Priority T&E CMs	anywhere we have gopher tortoises or be considered a "risk" is beyond our comprehension.		the NRA.	Economic
	anymore we have gopiner corcolled or se considered a Tisk is beyond our comprehension.	Marbelled Murrelet & Scale:	The methodology	20011011110
9.1 HCV 1 -	Very important question – what defines occurrence Within the range of the species? Habitat available and	Best thing that can be done	for identifying	
Priority T&E CMs	within range? Or actual surveys indicating a species exists here. Lots of work to do on this question.	for marbled murrelets is to	individual species	Economic
THOTILY TOLL CIVIS	within runge: Or actual our veys mulcating a species exists field, tots of work to do on this question.	TOT THAT DIEG THUTTETELS IS LO	maividuai species	Leonomic

		and the same and the same	.1 1.6	1
		grow bigger trees. At what	changed from	
		scale is the control measure	expert opinion to	
		expected to be followed?	the more	
		Within stand of occurrence?	systematic	
		Within home range? Within	approach that uses	
		x feet? Scale is an important	the NatureServe	
		question here and needs to	database and	
		be addressed.	assessing the	
			threats to each	
			species from forest	
			management	
			activities. The	
			resulting list of	
			species is quite	
			different than that	
			included in the first	
			draft. The scale of	
			risk designations	
			has also been	
			revised to assist	
			certificate holders	
			in determining	
			whether or not	
			they areas of	
			specified risk are	
			· ·	
			within their supply	
			areas.	
	FSC US unreasonably expects that procurement organizations have the expertise, capacity and capability to			
	survey and assess whether certain priority T&E species are present on-site (known to occur). Procurement			
	foresters are not trained wildlife biologists and are not capable of effectively serving in the manner envisioned.			
	Procurement organizations would have to try and convince the landowner that they hire a wildlife expert, or			
	agree to allow the procurement organization to bring outside experts onto their properties to look for such			
	occurrences. Given the threat that such priority species would be found, there is no incentive and virtually no			
	likelihood that landowners would agree to conduct such surveys.			
	·		The scale of risk	
	A more practical approach would be to offer incentive, easement or purchase programs to protect such species,		designations has	
	rather than impose the threat of Boycotts, habitat set-asides at landowner expense and confiscation of forest		been revised to	
	assets.		assist certificate	
	6356.			
	FCC LIC again suggests that sither suggest consultants be availabled as land a		holders in deciding	
	FSC US again suggests that either expert consultants be employed, or landowners that have chosen not to		whether or not	
	implement the FSC US Forest Management Standards conduct harvest operations according to the riparian		they areas of	
	standards set in the Standard (V1.0) or the appropriate region. FSC US has lost sight of the intent of the		specified risk are	
9.1 HCV 1 -	Controlled Wood Standard, and instead has turned it into the equivalent of the FSC Standards for Forest		within their supply	
Priority T&E CMs	Management, imposed indirectly through FSC Chain of Custody Certificate Holders and independent suppliers.		areas.	Economic
			The methodology	
	Gopher tortise: The current wording within this control measure assumes that GT is only found within longleaf	Gopher tortise: Change	for identifying	
	habitat. This control measure will have no impacts on the actual species where GT is found outside of longleaf	control measure to be	individual species	
	habitat. If control measures are to call for training and implementation for suppliers on the ground the control	specific to the species as	changed from	
	measure must be written in a way that fosters the same treatment for that species both inside and outside of its	opposed to the typical forest	expert opinion to	
	natural habitat. Change control measure to be specific to the species as opposed to the typical forest where the	where the species is found.	the more	
	species is found. Allow for control measure to be training of suppliers.	Allow for control measure to	systematic	
	species is found. Allow for control measure to be training of suppliers.	be training of suppliers.		
9.1 HCV 1 -	PC Woodpacker: Other plans and designs are being managed by the USEWS in the receivery of this species. As	be training or suppliers.	approach that uses	
	RC Woodpecker: Other plans and designs are being managed by the USFWS in the recovery of this species. As	DCM. Defeate the USENIC	the NatureServe	Faanamia
Priority T&E CMs	opposed to adding additional measures beyond federal backing the FSCUSNRA should call for certificate holders	RCW: Refer to the USFWS	database and	Economic

	to assist the federal initiative to recover this species through control measures such as training, monitoring, and	DCW/ recovery plan for	accessing the	
	, , , , , , , , , , , , , , , , , , , ,	RCW recovery plan for	assessing the	
	outreach.	management guidelines.	threats to each	
			species from forest	
			management	
			activities. The	
			resulting list of	
			species is quite	
			different than that	
			included in the first	
			draft. Gopher	
			tortoise and red	
			cockaded	
			woodpecker are no	
			longer designated	
			as specified risk in	
			the second draft of	
			the NRA.	
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
	The same additional account he state and the same and the same and the same and the same additional account in the same and the same an		suite of actions will	
	There are additional concerns about weakness in the control measures for certain species. Regarding habitat		be identified	
	protections for the Marbled Murrelet at section 9.1., control measures should require protection of all Murrelet		through a	
	populations and habitats, and not be couched in terms of maintaining habitats "across landscapes" As currently		collaborative	
9.1 HCV 1 -	written, the "across landscapes" language could allow for habitat in one area to be wiped-out as long as there is		dialogue at a	
Priority T&E CMs	habitat elsewhere. That loose language is not acceptable.		regional meeting.	Environmental
	Control Measures for Priority Threatened & Endangered Species		The methodology	
	The NRA acknowledges that the list of selected species is inherently value driven and based, in part, on		for identifying	
	stakeholder input. Because of the subjective nature of the selection process, it is not possible to develop a list of		individual species	
	"the most appropriate species." The Priority Threatened & Endangered Species are federally listed, and thus,		changed from	
	already afforded the protections of the Endangered Species Act. Thus, managers are already cognizant of the		expert opinion to	
	need to minimize risk of "take," copious guidelines from federal and state agencies already exist, and the added		the more	
	value of the Control Measures is unclear. There is even the possibility that the Control Measures could conflict		systematic	
	with federal and state rules and regulations.		approach that uses	
	Some Control Measures appear to be based on incorrect perceptions about forestry practices and impacts on		the NatureServe	
	forest vegetation. For example, the NRA suggests that managers should "Minimize impact on gopher tortoise		database and	
	habitats, including site prep, where they are known to occur." However, silvicultural practices such as use of		assessing the	
	chemical site preparation rather than mechanical site preparation, banding vs. broadcasting of herbaceous weed		threats to each	
	control herbicides, and thinning can be used to control hardwood encroachment and enhance herbaceous		species from forest	
	understory communities in plantation forests (see publications such as Jeffries et al. 2010; Jones et al. 2009,		management	
	2012; Lane et al. 2011). When combined with prescribed fire, herbicides are particularly useful for promoting		activities. The	
	development of a pine grassland community (e.g., Jones and Chamberlain 2004, Iglay et al. 2014) that often		resulting list of	
	provides high-quality habitat for species such as the gopher tortoise. A 2010 survey by NCASI indicated that		species is quite	
	1.	i	1 .	ĺ
	many family forest owners in the range of the tortoise routinely use these and other practices in their pine		different than that	
	many family forest owners in the range of the tortoise routinely use these and other practices in their pine forests to favor open stand conditions and enhance understory vegetation. Herbicides are particularly important			
	forests to favor open stand conditions and enhance understory vegetation. Herbicides are particularly important		included in the first	
	forests to favor open stand conditions and enhance understory vegetation. Herbicides are particularly important for forest management where fire risk or smoke impacts make controlled burning difficult or impossible. Other		included in the first draft. The second	
	forests to favor open stand conditions and enhance understory vegetation. Herbicides are particularly important for forest management where fire risk or smoke impacts make controlled burning difficult or impossible. Other Control Measures require actions that may be beyond the capacity of individual landowners and mills. For		included in the first draft. The second draft of the NRA	
	forests to favor open stand conditions and enhance understory vegetation. Herbicides are particularly important for forest management where fire risk or smoke impacts make controlled burning difficult or impossible. Other Control Measures require actions that may be beyond the capacity of individual landowners and mills. For example, the Control Measures for Kirkland's warbler suggest than land owners should "conduct harvest"		included in the first draft. The second draft of the NRA does not identify	
	forests to favor open stand conditions and enhance understory vegetation. Herbicides are particularly important for forest management where fire risk or smoke impacts make controlled burning difficult or impossible. Other Control Measures require actions that may be beyond the capacity of individual landowners and mills. For example, the Control Measures for Kirkland's warbler suggest than land owners should "conduct harvest operations in a manner sufficient to maintain the distribution and extent of mid-seral Jack Pine (aged 6-22 years)		included in the first draft. The second draft of the NRA does not identify specific mitigation	
9.1 HCV/1	forests to favor open stand conditions and enhance understory vegetation. Herbicides are particularly important for forest management where fire risk or smoke impacts make controlled burning difficult or impossible. Other Control Measures require actions that may be beyond the capacity of individual landowners and mills. For example, the Control Measures for Kirkland's warbler suggest than land owners should "conduct harvest operations in a manner sufficient to maintain the distribution and extent of mid-seral Jack Pine (aged 6-22 years) across the landscape." However, mills and suppliers may have limited area of Jack Pine forest on their land and		included in the first draft. The second draft of the NRA does not identify specific mitigation actions within the	
9.1 HCV 1 - Priority T&E CMs	forests to favor open stand conditions and enhance understory vegetation. Herbicides are particularly important for forest management where fire risk or smoke impacts make controlled burning difficult or impossible. Other Control Measures require actions that may be beyond the capacity of individual landowners and mills. For example, the Control Measures for Kirkland's warbler suggest than land owners should "conduct harvest operations in a manner sufficient to maintain the distribution and extent of mid-seral Jack Pine (aged 6-22 years)		included in the first draft. The second draft of the NRA does not identify specific mitigation	Economic

		actions will be	
		identified through	
		a collaborative	
		dialogue at a	
		regional meeting.	
	Some Control Measures appear to be based on incorrect perceptions about forestry practices and impacts on		
	forest vegetation. For example, the NRA suggests that managers should "Minimize impact on gopher tortoise		
	habitats, including site prep, where they are known to occur." However, silvicultural practices such as use of		
	chemical site preparation rather than mechanical site preparation, banding vs. broadcasting of herbaceous weed		
	control herbicides, and thinning can be used to control hardwood encroachment and enhance herbaceous		
	understory communities in plantation forests (see publications such as Jeffries et al. 2010; Jones et al. 2009,		
	2012; Lane et al. 2011). When combined with prescribed fire, herbicides are particularly useful for promoting		
	development of a pine grassland community (e.g., Jones and Chamberlain 2004, Iglay et al. 2014) that often	The second draft of	
	provides high-quality habitat for species such as the gopher tortoise. A 2010 survey by NCASI indicated that	the NRA does not	
	many family forest owners in the range of the tortoise routinely use these and other practices in their pine	identify specific	
	forests to favor open stand conditions and enhance understory vegetation. Herbicides are particularly important	mitigation actions	
	for forest management where fire risk or smoke impacts make controlled burning difficult.	within the control	
		measures, rather a	
	Other Control Measures require actions which may be beyond the capacity of individual landowners. For	suite of actions will	
	example, the Control Measures for Kirkland's warbler suggest that land owners should "conduct harvest	be identified	
	operations in a manner sufficient to maintain the distribution and extent of mid-seral Jack Pine (aged 6-22 years)	through a	
	across the landscape." However, individual landowners may have limited area of Jack Pine forest on their land	collaborative	
9.1 HCV 1 -	and no data on the age-class distribution of Jack Pine across the landscape or intentions of other landowners.	dialogue at a	
Priority T&E CMs	Thus, landowners may be unable to implement the proposed Control Measure for this species.	regional meeting.	Economic
THOTICY TOLL CIVIS	mas, fandowners may be anable to implement the proposed control weasare for this species.	The methodology	Leonomic
		for identifying	
		individual species	
		changed from	
		expert opinion to	
		the more	
		systematic	
		approach that uses	
		the NatureServe	
		database and	
		assessing the	
		threats to each	
		species from forest	
		management	
		activities. The	
		resulting list of	
		species is quite	
		different than that	
		included in the first	
		draft. The second	
		draft of the NRA	
		does not identify	
	The Control Measures for Priority Threatened and Endangered Species Are Open-Ended and Well Beyond Legal	specific mitigation	
	Requirements. Control Measures outlined in the draft NRA for species listed under the federal Endangered	actions within the	
	Species Act appear to be limited to six specific species, but the reasons for identifying these species for controls	control measures,	
		•	
	above and beyond the law are not given. The governing Controlled Wood standard allows for a much longer and	rather a suite of	
	open-ended list of "High Conservation Values," and the standard has many opportunities for stakeholder	actions will be	
	complaints and appeals, raising the question how FSC auditors will defend the decisions in the NRA. The NRA	identified through	
	also does not explain why it is not deferring to existing legal requirements and conservation agreements to	a collaborative	
9.1 HCV 1 -	protect listed species. As a result, what landowners must do to identify and protect listed species is left unclear	dialogue at a	
Priority T&E CMs	and vulnerable to challenge.	regional meeting.	Economic

			The scale of risk	
			designations has	
			been revised to	
			assist certificate	
			holders in	
F	FSC US unreasonably expects that procurement organizations have the expertise, capacity and capability to		determining	
s	survey and assess whether certain priority T&E species are present on-site (known to occur). Procurement		whether or not	
	foresters are not trained wildlife biologists and are not capable of effectively serving in the manner envisioned.		they areas of	
			specified risk are	
p	Procurement organizations would have to try and convince the landowner that they hire a wildlife expert, or		within their supply	
	agree to allow the procurement organization to bring outside experts onto their properties to look for such		areas. Additionally,	
	occurrences. Given the threat that such priority species would be found, there is no incentive and virtually no		the second draft of	
	likelihood that landowners would agree to conduct such surveys.		the NRA does not	
"	ilkelinood that landowners would agree to conduct such surveys.			
			identify specific	
	A more practical approach would be to offer incentive, easement or purchase programs to protect such species,		mitigation actions	
	rather than impose the threat of Boycotts, habitat set-asides at landowner expense and confiscation of forest		within the control	
a	assets.		measures, rather a	
			suite of actions will	
	FSC US again suggests that either expert consultants be employed, or landowners that have chosen not to		be identified	
ir	implement the FSC US Forest Management Standards conduct harvest operations according to the riparian		through a	
S	standards set in the Standard (V1.0) or the appropriate region. FSC US has lost sight of the intent of the		collaborative	
9.1 HCV 1 - C	Controlled Wood Standard, and instead has turned it into the equivalent of the FSC Standards for Forest		dialogue at a	
	Management, imposed indirectly through FSC Chain of Custody Certificate Holders and independent suppliers.		regional meeting.	Economic
,	, , , , , , , , , , , , , , , , , , , ,	No. A company participating	0	
		in a controlled wood		
		program should be enabled		
		to use the best available		
		information to assess where		
		priority T and E species (the		
		list needs to be seriously		
		reviewed and revised BTW)		
		might occur. The company		
		should be able to come up		
		with their own assessment		
		plan (any combination of		
		databases, regional or local		
		experts, other sources of		
		information) to assess		
		whether a species occurs in		
		a potential area. CBs should		
		be able to audit the	The scale of risk	
		effectiveness of their plan to	designations has	
		assess occurrence of priority	been revised to	
		T and E species. DO NOT tell	assist certificate	
		businesses how to do this,	holders in	
0.1 Question for		•		
9.1 Question for		they have a far better idea	determining	
Consultation -		of the best information	whether or not	
"known to occur"		available for the region in	they areas of	
, expert		question then folks	specified risk are	
	Does the note give sufficient clarity and flexibility around assessing species occurrence? Should database	developing the CW	within their supply	
	searches be a required part of this assessment?	assessment.	areas.	Economic
9.1 Question for			The second draft of	
a.t dnestion for				
Consultation -			the NRA does not	
I - I			the NRA does not identify specific	

			talata alao e e e e e e	
consultation &			within the control	
databases			measures, rather a	
			suite of actions will	
			be identified	
			through a	
			collaborative	
			dialogue at a	
			regional meeting.	
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
9.1 Question for			suite of actions will	
Consultation -			be identified	
"known to occur"			through a	
, expert	Expert consultation is not realistic and the costs of performing on the ground surveys are prohibitive. Current		collaborative	
consultation &	federal and state agency jurisdiction and enforcement is sufficient without wood procurement organizations		dialogue at a	
databases	intervening.		regional meeting.	Economic
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
9.1 Question for	In various places, expert consultation is required or may be used. As to the question of whether in-house		suite of actions will	
Consultation -	experts are acceptable, yes they should be. It should be noted that use of experts, whether in-house or outside,		be identified	
"known to occur"	is going to be very costly. Therefore, requirements for expert consultation in control measure should be used		through a	
, expert	very sparingly. It should be recognized that many suppliers will not have the wherewithal to hire such experts. It		collaborative	
consultation &	should be recognized that expert opinion can vary among experts, and this could result in inconsistent		dialogue at a	
databases	implementation of control measures among certificate holders.		regional meeting.	Economic
databases	implementation of control measures among certificate moders.	Database review for T/E	regional meeting.	Leonomic
		should be one way of		
		highlighting that risk is	The second draft of	
		minimized. Training should	the NRA does not	
		be another way of	identify specific	
		•		
		highlighting that risk is	mitigation actions within the control	
		minimized. 3rd party		
0.1 Question for		certification should exempt	measures, rather a suite of actions will	
9.1 Question for		suppliers from this		
Consultation -		requirement altogether.	be identified	
"known to occur"	Civan the model of indirect supply it is impropried to you in a database country.	Any of the three list	through a	
, expert	Given the model of indirect supply it is impractical to require a database search. Training on control measures is	Any of the three ways listed	collaborative	
consultation &	required within the DDS section. Control measures should be geared towards this education that will ultimately	above should be acceptable	dialogue at a	F
databases	have an on the ground impact and not limited to a database review.	to minimize risk of impacts.	regional meeting.	Economic
			The second draft of	
0.4.0			the NRA does not	
9.1 Question for			identify specific	
Consultation -	Sufficient clarity is given in the note for 9.1.		mitigation actions	
"known to occur"	Databases searches and expert consultation (even in-house) should be required.		within the control	
, expert			measures, rather a	
consultation &	Consultation with in-house experts where available is sufficient, for those without experts in-house consultation		suite of actions will	
databases	with outside experts should be conducted.		be identified	Economic

			through a	
			collaborative	
			dialogue at a	
			regional meeting.	
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
9.1 Question for			suite of actions will	
Consultation -			be identified	
"known to occur"	The note does give sufficient clarity and flexibility around assessing species occurrence. Database searches		through a	
, expert	should only be required on direct purchases. Expert consultation should not be required.		collaborative	
consultation &			dialogue at a	
databases	Consultation with in-house experts is sufficient. Use of published literature should be noted.		regional meeting.	Economic
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
9.1 Question for			suite of actions will	
Consultation -			be identified	
"known to occur"			through a	
, expert	Expert consultation is not realistic and the costs of performing on the ground surveys are prohibitive. Current		collaborative	
consultation &	federal and state agency jurisdiction and enforcement is sufficient without wood procurement organizations		dialogue at a	
databases	intervening		regional meeting.	Economic
databases	mervening		The second draft of	Leonomic
		Databases often have	the NRA does not	
		copious amounts of very	identify specific	
		dated occurrence data	mitigation actions	
		present. Parsed out	within the control	
		databases that is applicable	measures, rather a	
9.1 Question for			suite of actions will	
*		to today would have to be		
Consultation -		provided.	be identified	
"known to occur"		Cost to access the	through a	
, expert	Not the control of the Control of	database would have to be	collaborative	
consultation &	No it does not provide sufficient clarity.	minimal and very user	dialogue at a	
databases	Database search should not be required unless provided at little cost to participant	friendly.	regional meeting.	Economic
		First, get the NSO habitat	The methodology	
		correct for northern	for identifying	
		California – NSO's in	individual species	
		California select for home	changed from	
		ranges with a wide variety of	expert opinion to	
		habitats; including some	the more	
		nesting/roosting habitat	systematic	
		with available nest	approach that uses	
		structures (number 1	the NatureServe	
	The information here is more pertinent for Oregon and Washington. In California, NSOs use an entirely different	limitation)! Re-write and	database and	
	prey base and live in entirely different habitat conditions. It's ridiculous to require harvest to not reduce habitat	take out the late	assessing the	
9.1 Question for	quality where a species exists (it could be argued that the harvest of any tree will reduce habitat quality) – at	successional forest section –	threats to each	
Consultation -	what scale are we talking? Home range? Across the species range? These control measures are unenforceable	what they need is a mix of	species from forest	
NSO	because the interpretation of the CM is unclear.	Nesting/roosting habitat and	management	Economic
		0, 0	- 0	

		foraging habitat to meet needs. Require that where NSOs occur – harvest meets critical habitat minimums as required by USFWS and state wildlife agencies. LEAVE IT AT THAT. As written this is incredibly difficult to assess; not specific –I have no idea how I would enforce what is written – far easier to check to make sure harvest operations are meeting state and federal law required to the endangered species.	activities. The resulting list of species is quite different than that included in the first draft. Northern Spotted Owl is no longer designated as specified risk in the second draft of the NRA.	
9.1 Question for Consultation - NSO	While not in Evergreen's wood shed, we are concerned with the general approach in this NRA as the cost of implementing such a control program is not justified and is unlikely to happen in any event. Additional restrictions add costs and may eventually make forestry uneconomic. Forest owners that have not voluntarily subscribed to the FSC Forest Management Standards are very likely to reject such controls. Evergreen Packaging is not positioned or willing to be the enforcement agent and impose high costs on private landowners for some of the control measures outlined in the proposed NRA.		The methodology for identifying individual species changed from expert opinion to the more systematic approach that uses the NatureServe database and assessing the threats to each species from forest management activities. The resulting list of species is quite different than that included in the first draft.	Economic
9.1 Question for Consultation - NSO 9.1 Question for Consultation - NSO	The cost of implementing a control program is not justified and is unlikely to happen in any event. Additional restrictions add costs and may eventually make forestry uneconomic. Forest owners that have not voluntarily subscribed to the FSC Forest Management Standards are very likely to reject such controls. The Company is not positioned or willing to be the enforcement agent and impose high costs on private landowners. Current control measures for RT& E and their habitat types provide some flexibility for suppliers, the control measures will ensure the longevity of the species and their habitat.		The second draft of the NRA does not identify specific mitigation actions within the control measures, rather a suite of actions will be identified through a collaborative dialogue at a regional meeting. The second draft of the NRA does not identify specific mitigation actions within the control measures, rather a suite of actions will	Economic

			be identified	
			through a	
			collaborative	
			dialogue at a	
			regional meeting.	
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
			suite of actions will	
			be identified	
	The cost of implementing a control program is not justified and is unlikely to happen in any event. Additional		through a	
9.1 Question for	restrictions add costs and may eventually make forestry uneconomic. Forest owners that have not voluntarily		collaborative	
Consultation -	subscribed to the FSC Forest Management Standards are very likely to reject such controls. Appyion is not		dialogue at a	
NSO	positioned or willing to be the enforcement agent and impose high costs on private landowners.		regional meeting.	Economic
1,130	positioned or mining to be the emotechnene agent and impose high costs on private inhuowhers.		The second draft of	LCOHOIIIC
			the NRA does not	
		Allow compliance with	identify specific	
		applicable State BMPs to	mitigation actions	
		• •	within the control	
		meet this control measure.		
		BMP compliance is already	measures, rather a	
		required in many supplier	suite of actions will	
		contracts. Eliminate	be identified	
		requirement for consultation	through a	
9.1 Question for		in areas where management	collaborative	
Consultation -	In Maine, State BMPs address this. In Maine, salmon habitat is identified, and BMPs are established. Further	protocols are established	dialogue at a	
Salmonids	consultation should not be required.	and publicized.	regional meeting.	Economic
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
			suite of actions will	
			be identified	
	Local, regional, and state governments will address basin-level standards – no need to add the "expert		through a	
9.1 Question for	consultation" thing in here. Does this mean someone could argue a basin plan developed by a water quality		collaborative	
Consultation -	board did not involve expert consultation so more review needs to be done before it can be called controlled	Remove the expert	dialogue at a	
Salmonids	wood? Seems ridiculous.	consultation clause.	regional meeting.	Economic
	While not present in Evergreen's wood basket, the control measures for Listed Anadromous Salmonids are			
	particularly concerning due to the high cost of expert consultants and extending protection areas beyond those		The second draft of	
	designated in regulatory forest practices acts administered by state regulatory agencies. Wood suppliers are not		the NRA does not	
	under the control of the consuming mills. Developing customized BMPs for all listed and major tributary streams		identify specific	
	is unrealistic.		mitigation actions	
			within the control	
	While not in Evergreen's wood shed, we are concerned with the general approach in this NRA as the cost of		measures, rather a	
	implementing such a control program is not justified and is unlikely to happen in any event. The cost and		suite of actions will	
	complexity of such an effort is likely to prevent adoption and to drive forest owners, and ultimately consuming		be identified	
	mills, away from FSC. A less-costly approach would be to specify reasonable regional default protections, and		through a	
9.1 Question for	then allow for deviation based on consultation with experts, where they exist. Requiring reference to this		collaborative	
Consultation -	literature is not likely to be the deciding factor, as the cost-benefit consideration will likely drive most decision-		dialogue at a	
Salmonids	makers away from the controlled wood program regardless of this final requirement.		regional meeting.	Economic
34	makers and a man are controlled wood program regardless of this final requirement.		. co.onai meemig.	

		1		
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
			suite of actions will	
	The cost and complexity of such an effort is likely to prevent adoption and to drive forest owners, and ultimately		be identified	
	consuming mills, away from FSC. A less-costly approach would be to specify reasonable regional default		through a	
9.1 Question for	protections, and then allow for deviation based on consultation with experts, where they exist. Requiring		collaborative	
Consultation -	reference to this literature is not likely to be the deciding factor, as the cost-benefit consideration will likely drive		dialogue at a	
Salmonids	most decision-makers away from the controlled wood program regardless of this final requirement.		regional meeting.	Economic
Samonas	most decision makers away from the controlled wood program regulatess of this matricipantement.		The second draft of	Leonomic
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
			suite of actions will	
			be identified	
			through a	
9.1 Question for			collaborative	
Consultation -	Current control measures for RT& E and their habitat types provide some flexibility for suppliers, the control		dialogue at a	
Salmonids	measures will ensure the longevity of the species and their habitat.		regional meeting.	Economic
	The control measures for Listed Anadromous Salmonids are particularly concerning due to the high cost of			
	expert consultants and extending protection areas beyond those designated in regulatory forest practices acts			
	administered by state regulatory agencies in the Northwest. Wood suppliers are not under the control of the			
	consuming mills. Developing customized BMPs for all listed and major tributary streams is unrealistic.			
	, ,			
	The cost and complexity of such an effort is likely to prevent adoption and to drive forest owners, and ultimately		The second draft of	
	consuming mills, away from FSC. A less-costly approach would be to specify reasonable regional default		the NRA does not	
	protections, and then allow for deviation based on consultation with experts, where they exist. Requiring		identify specific	
	reference to this literature is not likely to be the deciding factor, as the cost-benefit consideration will likely drive		mitigation actions	
	most decision-makers away from the controlled wood program regardless of this final requirement.		within the control	
	most decision makers away from the controlled wood program regulatess of this imarrequirement.		measures, rather a	
	Implementing water quality standards similar to the Control Measures for anadromous salmonids is not realistic,		suite of actions will	
	as forestry has a minor impact on aquatic habitats as demonstrated by very high implementation rates of BMPs.		be identified	
	Current BMP implementation rates at 95+% are due largely to the SFI program's SFI Implementation Committee			
0.1 Question for			through a	
9.1 Question for	and training infrastructure. Harvesting contractors and their employees will struggle to implement a different		collaborative	
Consultation -	and more restrictive set of riparian buffers beyond those established by state forestry and water quality		dialogue at a	Foonomic
Salmonids	agencies. Judgments as to the effectiveness of BMPs should be left to the respective state agencies.		regional meeting.	Economic
	Sierra Nevada Mixed Conifer Stands Control Measure: Compliance with CA Forest Practice Rules and SFI Fiber			
	Sourcing indicators should be sufficient to ensure compliance.			
			The second draft of	
	Coastal Prairies and Montane Meadows Control Measure: Requirement to conduct surveys is cost prohibitive.		the NRA does not	
	These habitats are often found as inclusions within other forest conditions making it very difficult to delineate.		identify specific	
			mitigation actions	
	Mixed Conifer Klamath-Siskiyou Control Measure: Area currently adapted to lo-mid fire severity and frequency.		within the control	
	Compliance with existing BMPs should be sufficient to ensure compliance.		measures, rather a	
			suite of actions will	
	Aquatic Habitats Southern Appalachians Control Measure: Cahaba River watershed is the center of the		be identified	
9.2 HCV 1 -	biodiversity hotspot. Compliance with existing BMPs should be adequate to ensure compliance.		through a	
Critical		Existing protections should	collaborative	
Biodiversity Area	Bibb County Glades Southern Appalachians Control Measure: Area is already protected. Located within the TNC	be acknowledged and	dialogue at a	
CMs	Bibb County Glades Preserve which is located within Cahaba River National Refuge.	accepted.	regional meeting.	Economic
CIVIS	Dies County Glades i reserve willer is located within canaba fiver frational neruge.	accepted.	regional infecting.	Leonomic

	Longleaf Pine Habitats Control Measures: Biodiversity value driven in part by understory plant community.			
	Adequately protected under existing regulatory and non-regulatory rules and guidelines.			
	Disc Estuarda Control Manager Compliance with state forestry and wildlife DNADs and CELEbra Sourcian rules			
	Pine Fatwoods Control Measure : Compliance with state forestry and wildlife BMPs and SFI Fiber Sourcing rules should be adequate to ensure compliance.			
	should be adequate to ensure compliance.		The CBAs were	
			determined by the	
			Critical Biodiversity	
			Areas Dataset that	
			identifies areas	
			with high	
			concentrations of	
			rare species. The	
			second draft of the	
			NRA analyzes the	
			CBAs as a whole	
			rather than	
			individual habitats	
			within the CBAs, recognizing that	
			the habitats	
			contribute to the	
			biodiversity of	
			these areas. The	
			Priority Forest	
			Types were	
			developed by the	
			NRA WG using the	
			US FM standard as	
			guidance, along	
			with additional	
			input from	
			stakeholders. Both	
			of these areas	
			were then	
			assessed to	
			determine if they are being	
			threatened by	
			forest	
			management.	
			Additional	
			documentation to	
	The NRA identified Critical Biodiversity areas based on a species richness index developed by NatureServe and		support the	
	The Nature Conservancy (Chaplin et al. 2000). The analysis by Chapin et al. (2000) identified concentrations of		justification and	
	"biodiversity" based on occurrences from NatureServe of 2,800 rare species in the U.S., weighting each species		rationale for the	
	proportional to its range. The NatureServe element occurrence data provides sound information about		risk designations	
	observations of rare species. However, the database and the analysis have limitations. For example, there have		has been provided.	
	been no uniform surveys of rare species across the nation. Thus, the geographic distribution of element			
	occurrences is influenced by survey effort and additional observations may remain undiscovered due to a lack of		Additionally, the	
0.2 50//4 00//5 1	surveys. Also, as the NRA acknowledges, the index based on these data is influenced by non-forest species.		second draft of the	
9.2 hCV 1 - Critical	Although, the NRA presents no information about the extent of that influence, it concludes that "in areas that		NRA does not	
Biodiversity Area	are predominantly forested or forest matrix it should be representative of biodiversity per HCV1." The NRA presents no test of this assumption.		identify specific	Economic
CMs	ן אופספונס ווט נפסנ טו נוווס מססטווויףנוטוו.	l	mitigation actions	Economic

			within the control	
			measures, rather a	
			suite of actions will	
			be identified	
			through a	
			_	
			collaborative	
			dialogue at a	
			regional meeting.	
	The NRA states that Priority Habitats in Critical Biodiversity Areas "were identified in part through consultation			
	with regional experts," and that "Priority habitats were selected based on habitat types that were determined to			
	be representative of the biodiversity associated with the area." However, the NRA presents no information			
	about the regional experts who selected the areas or the methods and criteria they used. Based on the lack of			
	information about how the Critical Biodiversity Areas were identified, readers of the NRA are left to assume that			
	the Priority Habitats were selected because they support unusual concentrations of rare species. However, no			
	evidence of this relationship is presented. For which species are the Priority Habitats important? Identifying			
	these relationships provides information that can strengthen the scientific rigor of the NRA and provide public			
	commenters with information necessary to assess the proposed control measures.			
	Additionally, the Priority Habitats do not appear to align with an established ecosystem classification system.			
	Furthermore, descriptions in the NRA of some Priority Habitats do not contain sufficient detail to facilitate			
	identification in the field. Because they are within Critical Biodiversity Areas identified based on element			
	occurrence data from NatureServe, a logical approach would have been to identify Priority Habitats using			
	NatureServe Ecological Systems (Comer et al. 2003) or U.S. National Vegetation Classification Alliances or			
	Associations (Jennings et al. 2009). Such an alignment would allow a list of associated rare species to be			
	developed and would enhance the ability of forest managers to identify these Priority Habitats.			
	Descriptions of the Priority Habitats identify "potential" threats that are unsupported by citations from the peer-			
	reviewed scientific literature and appear speculative. Terms such as "potential" and "may" appear numerous			
	times in Section 3.3.1 with respect to "threats." Some of these potential threats clearly are unsupported by			
	scientific information. For example, in the description of Pocosins/ Carolina Bays in the Cape Fear Arch, the NRA			
	states that there is "[s]ome stakeholder perspective that 'shovel- logging' of these mesic sites may result in			
	undesirable regeneration." However, the NRA presents no technical basis for this perception.			
	Recent research by Kimberly Bohn and Matthew Cohen (School of Forest Resources and Conservation, University			
	of Florida) evaluated plant communities in forested wetlands following mat logging in accordance with Florida			
	best management practices. The authors found that mat-logging Best Management Practices clearly reduced the			
	extent and impact of skid trails on soil displacement, rutting, and microtopography. They also found that mat-			
	logged sites appeared to have similar species composition to reference wetland sites and with more cypress			
	stems in dominant positions. A publication from this research project is under development.			
	Similarly, the description of "Montane Longleaf Pine" suggests that the use of forest herbicides will potentially			
	harm biodiversity, although studies such as Iglay et al. (2014) have shown that herbicides can be used to			
	maintain high levels of understory plant diversity. The NRA suggests that sedimentation from forest			
	management activities is a threat to biodiversity values in the Apalachicola Bay/River System in the Florida			
	Panhandle and in the Oachita River Valley.			
	·			
	However, the NRA presents no evidence to support these assertions, which contrast with the fact that the			
	overall rate of implementation of forestry best management practices in Florida during 1997 – 2011 ranged from			
	96% to 99% (Southern Group of State Foresters 2012), with implementation rates likewise high elsewhere.			
	The NRA provides no description of which rare species are to be addressed by the Control Measures. It also is			
	unclear how Control Measures for some Priority Habitats can be implemented. For example, forest harvesting by			
	definition alters stand-level structure and, as a result, associated plant and animal communities change. Yet, the			
	Control Measure for Sierra Nevada Mixed Conifer Stands in California and Mixed Conifer Stands in the Klamath-			
	Siskiyou recommend that stand-level species and structural diversity be maintained over time.			
		After further assessment of	The second draft of	
	While BMP use may be voluntary and BMPs differ among states, it is important to remember that compliance	the situation in Alabama,	the NRA does not	
9.2 Question for	with the Clean Water Act is not. In order to assess whether separate requirements are needed in Alabama data	decide if control measures	identify specific	
Consultation -	would need to be present that the BMPs are not affective and/or not being properly implemented. This	are needed. A possible	mitigation actions	
		-	_	Faanamia
BMPs in Alabama	document doesn't go into enough detail to assess that. If the data do show this, then a possible control measure	control measure could be for	within the control	Economic

	The factor of the section of the sec	the configuration of the con-		
	could be for the certificate holder to perform a subset of site visits to ensure low risk of non-conformance with	the certificate holder to	measures, rather a	
	the CWA.	perform a subset of site	suite of actions will	
		visits to ensure low risk of	be identified	
		non-conformance with the	through a	
		CWA.	collaborative	
			dialogue at a	
			regional meeting.	
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
	FSC US states that Alabama BMPs are insufficient without any supporting evidence, then suggests that more		within the control	
	rigourous BMPs (above and beyond those adopted by other states and approved by the EPA) should be		measures, rather a	
	implemented in Alabama. Implementing water quality standards similar to the control measures for andromous		suite of actions will	
	salmonids is not realistic, forestry has a minor impact on aquatic habitats with the implementation of BMPs, and		be identified	
	there is robust evidence that Clean Water Act compliance related to forestry activity is successful due to BMP		through a	
9.2 Question for	implementation by loggers and landowners. Landowners should not have to adopt more restrictive riparian		collaborative	
Consultation -	buffers, those established by the state forestry and water quality agencies via established BMPs are effective and		dialogue at a	
BMPs in Alabama	sufficient.			Economic
DIVIES III AIGUGIIIG	Surreint.		regional meeting. The second draft of	LCOHOIIIC
			the NRA does not	
			identify specific	
			mitigation actions	
	Implementing water quality standards similar to the Control Measures for anadromous salmonids is not realistic,		within the control	
	as forestry has a minor impact on aquatic habitats as demonstrated by very high implementation rates of BMPs		measures, rather a	
	and training infrastructure (likely due to SFI Implementation Committees). Harvesting contractors and their		suite of actions will	
	employees will struggle to implement a different and more restrictive set of riparian buffers beyond those		be identified	
	established by state forestry and water quality agencies. Judgments as to the effectiveness of BMPs should be		through a	
9.2 Question for	left to the respective state agencies. It is unrealistic to expect FSC Certificate Holders to implement measures		collaborative	
Consultation -	beyond BMP compliance through command and control measures on loggers and landowners not voluntarily		dialogue at a	
BMPs in Alabama	subscribed to the FSC Forest Management standards.		regional meeting.	Economic
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
			suite of actions will	
			be identified	
			through a	
9.2 Question for	FSC US speculates, without any stated evidence, that the Alabama BMPs are somehow insufficient to protect		collaborative	
Consultation -	aguatic habitat. The suggestion is then offered that additional BMPs, above and beyond those adopted by the		dialogue at a	
BMPs in Alabama	States, or undefined water quality standards, would have to be implemented in lieu of State BMPs.		regional meeting.	Economic
DIVII 3 III Alaballia	States, or undermed water quality standards, would have to be implemented in ned of state bivirs.		The second draft of	Leonomic
			the NRA does not	
			identify specific	
	DAMP consideration in Alabama. Foothermore to decide that consists decide at DAMP control of the decide at the second sec		mitigation actions	
	BMPs compliance in Alabama. For the group to decide that expertly developed BMPs are inadequate to address		within the control	
	their values, there must be compelling data to support that. This decision cannot be value driven as each		measures, rather a	
	chamber may have different values regarding this.		suite of actions will	
9.2 Question for			be identified	
Consultation -	Otherwise state water quality BMP compliance is generally an appropriate control measure for these areas.		through a	
BMPs in Alabama	Compliance trends are available and logger training has proven an effective tool for implementation.		collaborative	Economic

			dialogue at a	
			regional meeting.	
		Remove wording from	The second draft of	
		standard calling for	the NRA does not	
		additional measures to be	identify specific	
		taken in specific states,	mitigation actions	
		including wording on page	within the control	
		26 of 'control measures and	measures, rather a	
		questions for consultation.'	suite of actions will	
			be identified	
	The NRA states that BMPs are poorly implemented in specific states or that sedimentation is a key issue in	9.2 Q for consult – If data	through a	
9.2 Question for	specific areas. There is no scientific reference to these grounds and findings. Land is currently certified to both	cannot be provided on	collaborative	
Consultation -	FSC and SFI standards within these states and the FSC FM standards do not require that additional steps are	impacts this section should	dialogue at a	
BMPs in Alabama	taken. This wording within the NRA is beyond what is required on FSC certified land.	be removed.	regional meeting.	Economic
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
	Stakeholder concern is not evidence that BMPs are insufficient. BMPs are studied, tested and approved through		suite of actions will	
	a rather tedious process. Compliance rates for voluntary BMPs in the southeast is well over 90%, rivalling		be identified	
	mandated BMP states.		through a	
9.2 Question for	One cannot recommend that measures beyond state issued and EPA approved BMP programs are necessary for		collaborative	
Consultation -	protection of aquatic resources, without substantial evidence that these resources are in fact harmed by current		dialogue at a	
BMPs in Alabama	practices.		regional meeting.	Economic
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
			suite of actions will	
			be identified	
0.2.0	see the little and th		through a	
9.2 Question for	FSC should not require measures beyond Alabama BMPs based on stakeholder concerns. Standard requirements		collaborative	
Consultation -	should be data driven and judgments as to the effectiveness of BMPs should be the domain of the relevant state		dialogue at a	
BMPs in Alabama	agencies.		regional meeting.	Economic
	FSC US speculates, without any stated evidence, that the Alabama BMPs are somehow insufficient to protect			
	aquatic habitat. The suggestion is then offered that additional BMPs, above and beyond those adopted by the			
	States, or undefined water quality standards, would have to be implemented in lieu of State BMPs.		The second draft of	
	FSC US also suggests excessively vague Control Measures for Pocosins/Carolina Bays, including "harvesting in a		the NRA does not	
	manner that maintains native plant diversity." Clearly, a wood procurement organization has no influence on		identify specific	
	maintaining native plant diversity and it is unclear what training programs would be appropriate, what		mitigation actions	
	monitoring should take place and how verification of effectiveness would be conducted.		within the control	
	monitoring should take place and now verification of effectiveness would be conducted.		measures, rather a	
	FSC US goes on to suggest that wood procurement organizations should somehow be held responsible for		suite of actions will	
	implementing Control Measures to maintain Longleaf Pine Savannas and Late Successional Bottomland		be identified	
	Hardwoods "across the landscape." The Control Measure suggests some sort of "mitigation banking" as a		through a	
9.2 Question for	burden of proof to show that harvesting is compensated by recruitment elsewhere. These kinds of statements		collaborative	
Consultation -	and propositions suggest that FSC US has no concept or understanding of what FSC Certificate Holders are able		dialogue at a	
BMPs in Alabama	to do, and not do, as wood procurement organizations.		regional meeting.	Economic
DIVIT 3 III Alabalila	to do, and not do, as wood procurement organizations.		regional meeting.	LEGITOTTIC

			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
		BMP compliance should be	suite of actions will	
		made mandatory and should	be identified	
		•		
		be included in supplier	through a	
9.2 Question for		agreements for the priority	collaborative	
Consultation -	If BMP compliance data is available, updated, reliable and defensible then any changes proposed by stakeholders	habitats within critical	dialogue at a	
BMPs in Alabama	should be made through the state channels not FSC.	biodiversity areas.	regional meeting.	Economic
	The requirement says that companies cannot take fiber from IFLs on public lands. However, the Summary says		IFLs are designated	
	that only the IFLs and Roadless areas in the western states have specified risk. So are all IFLs on public lands off		as Low Risk in the	
	limits or not? The language in the summary appears to mean that all IFLs & Roadless areas others than those	Clarify the stance on IFLs	second draft of the	
9.3 HCV 2 - IFL	listed are "low risk"	and Roadless areas	NRA.	Economic
			Roadless Areas are	
	Inventoried Roadless Areas and Wilderness Study Areas Control Measure: The draft document inappropriately		designated as Low	
9.4 HCV 3 -	determines protection levels for roadless areas.		Risk in the second	
Roadless Areas	Under federal law timber harvest is not currently allowed in either of these designations.		draft of the NRA.	Economic
110uuless 7 ii eus	The requirement says that companies cannot take fiber from IFLs on public lands. However, the Summary says		IFLs are designated	Leonomic
	that only the IFLs and Roadless areas in the western states have specified risk. So are all IFLs on public lands off		as Low Risk in the	
0.41101/3		Clarify the stance on IFI o		
9.4 HCV 3 -	limits or not? The language in the summary appears to mean that all IFLs & Roadless areas others than those	Clarify the stance on IFLs	second draft of the	
Roadless Areas	listed are "low risk"	and Roadless areas	NRA.	Economic
	Designation of Risk on Federal Lands (5.3.4 Roadless Areas): Risk should not be designated on Federal lands			
	outside of Inventoried Roadless areas and Wilderness Study Areas. Federal lands are some of the most heavily			
	regulated areas for timber management in the nation, with laws including the National Forest Management Act			
	and National Environmental Policy Act. Timber sales are developed in accordance with forest management plans			
	and undergo rigorous environmental reviews, with stakeholder input and the opportunity for parties to appeal			
	the decisions made by the Forest Service and Bureau of Land Management, and ultimately, challenge the		Roadless Areas are	
	decisions in court. FSC-US should rely on the system currently in place, and refrain from adding an additional		designated as Low	
9.4 HCV 3 -	unnecessary and duplicative level of burden that could hinder the ability of these land managers to effectively		Risk in the second	
Roadless Areas	manage and sustain our nation's public forests.		draft of the NRA.	Economic
			Roadless Areas are	
			designated as Low	
9.4 HCV 3 -	Inventoried Roadless Areas and Wilderness Study Areas Control Measure:		Risk in the second	
Roadless Areas	Under federal law timber harvest is not currently allowed in either of these designations.		draft of the NRA.	Economic
110uuless 7 ii eus	Mesophytic Cove Sites Control Measure: The control measure is vague, would be difficult to measure, and		draft of the Nivi.	Leonomic
	would be un-auditable.			
	would be diff-additable.			
	Late Suppositional Restaurand Handward Control Magazine The control in contro			
	Late Successional Bottomland Hardwood Control Measure: The control measure is ambiguous. Seems to			
	require a landscape level assessment or inventory of stands that meet the conditions. This beyond the capability			
	of most procurement organizations.		The second draft of	
	Greater than 100 years would be a more appropriate age class.		the NRA does not	
	These stand conditions cannot be maintained even if they are protected.		identify specific	
	The Control Measure for Late Successional Bottomland Hardwoods will be challenging to implement. It requires		mitigation actions	
	that "Where stands greater than 80 years old are clearcut or otherwise harvested in a manner that reduces the		within the control	
	quality and quantity of this forest type, it is shown that a commensurate quantity and quality of bottomland		measures, rather a	
	hardwoods are being recruited in the > 80 year age class." It is unclear how this can be implemented when		suite of actions will	
	decisions about harvesting are made by individual landowners who may only have limited area of this forest type		be identified	
	on their property and no information about age-class distribution of bottomland hardwood forests within the		through a	
9.5 HCV 3 -	broader landscape. A further concern is that this Control Measure is based on the invalid assumption that		collaborative	
Priority Forest	harvesting of bottomland hardwood forests >80 years old diminishes biodiversity value. While harvesting may		dialogue at a	
Types	change stand age class and structure, it does not diminish biodiversity.		regional meeting.	Economic
	1 0 0		U	

	T		Т	
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
	We previously stated our concerns relative to the requirements for 9.2 and 9.5 around longleaf pine savannas		measures, rather a	
	and late successional bottomland forests; however, we emphasize them again here as related to Control		suite of actions will	
	Measures. Rewording the requirements to encourage active management rather than specifying 80 years of age		be identified	
	for bottomland hardwoods or demonstrating "commensurate recruitment" when stands are harvested would		through a	
9.5 HCV 3 -	help keep both forest types in well managed working forest conditions. Clearly specifying any priority forest type		collaborative	
Priority Forest	that is third party certified or has a forest management plan that incorporates the species' ecological		dialogue at a	
Types	management needs as "low risk" would again serve as incentive to increase acres of these forest types.		regional meeting.	Economic
			The second draft of	
			the NRA does not	
			identify specific	
			mitigation actions	
		Re recruitment of longleaf	within the control	
		some examples of burden of	measures, rather a	
		proof could include:	suite of actions will	
		Support (financial or in	be identified	
		kind) of longleaf restoration	through a	
9.5 HCV 3 -		efforts	collaborative	
Priority Forest		Net increase in longleaf	dialogue at a	
Types	See comments above re bottomlands and longleaf	acreages in the supply area	regional meeting.	Economic
		,	The second draft of	
	FSC US also suggests excessively vague Control Measures for Pocosins/Carolina Bays, including "harvesting in a		the NRA does not	
	manner that maintains native plant diversity." Clearly, a wood procurement organization has no influence on		identify specific	
	maintaining native plant diversity and it is unclear what training programs would be appropriate, what		mitigation actions	
	monitoring should take place and how verification of effectiveness would be conducted.		within the control	
			measures, rather a	
	FSC US goes on to suggest that wood procurement organizations should somehow be held responsible for		suite of actions will	
	implementing Control Measures to maintain Longleaf Pine Savannas and Late Successional Bottomland		be identified	
	Hardwoods "across the landscape." The Control Measure suggests some sort of "mitigation banking" as a		through a	
9.5 HCV 3 -	burden of proof to show that harvesting is compensated by recruitment elsewhere. These kinds of statements		collaborative	
Priority Forest	and propositions suggest that FSC US has no concept or understanding of what FSC Certificate Holders are able		dialogue at a	
Types	to do, and not do, as wood procurement organizations.		regional meeting.	Economic
	I cannot speak to any scientific basis for several of the PFTs; however I will address the mesophytic cove sites		, ,	
	and bottom land hardwoods. Neither are clearly enough defined to allow for measurement of compliance.			
	Additionally, neither of these types appear to have a silvicultural basis for the management techniques outlined.		The second draft of	
	,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,,		the NRA does not	
	Compliance: There is no reasonable method that I can use to explain this idea to a supply base and require that		identify specific	
	they avoid them or maintain certain stand structure elements to remain compliant. The PFTs seem to be		mitigation actions	
	subjective and lacking in a solid scientific basis. The NRA cannot function with a wish list of poorly defined areas		within the control	
	to potentially protect. I understand the idea and I can agree that there are important areas to consider that are		measures, rather a	
	difficult to map. I also understand that these areas will be located on private land and that as an industry and a		suite of actions will	
	certification scheme, we will not be able to dictate the terms of management on these sites. Putting the onus of		be identified	
	nearly impossible compliance expectations on the economic chamber will not solve this issue. Instead, it will		through a	
9.5 HCV 3 -	undermine the system and cause further erosion in the number of certified manufacturers. Areas of specified		collaborative	
Priority Forest	risk need to go beyond just specifying a risk, they must specify the area, the control measure, and what the		dialogue at a	
Types	impact of the control measure will be.		regional meeting.	Economic
1,1,000	Bottomland Hardwoods: This control measure is not implementable for a procurement organization or any	Bottomland Hardwoods:	The second draft of	
9.5 HCV 3 -	organization that is not the actual land manager. The age criterion for this control measure is meaningless when	The control measure is	the NRA does not	
Priority Forest	the desired outcome is to ensure that a characteristic is maintained across the landscape. If the wording within	currently NOT	identify specific	
Types	the desired outcome is to ensure that a characteristic is maintained across the landscape. If the wording within the FSC FM standard allows for management of old growth stands while maintaining stand characteristics with	implementable: Remove 80	mitigation actions	Economic
i ypes	The 130 FM Standard anows for management of old growth stands while maintaining stand characteristics with	implementable. Remove 60	mingation actions	LCOHOITIC

	no mention of age, this control measure should also have that flexibility.	year age wording from this control measure. The note	within the control measures, rather a	
	Without baseline data on stand age and stand characteristics we do not see how any organization or CB will be	below this control measure	suite of actions will	
	able to implement a monitoring program. The companies that are purchasing this material are only purchasing	should be removed.	be identified	
	small components of the wood sold from an individual harvest. This network of multiple companies purchasing	Silvala se removear	through a	
	from one logger/supplier creates issues implementing any control measure other than training and literature		collaborative	
	geared towards desired stand characteristics that are maintained and BMPs that are upheld.		dialogue at a	
	Secret towards desired stand characteristics that are maintained and similar that are apricial		regional meeting.	
	We do not believe auditing consistency will occur because of how this control measure is written. Different		regional meeting.	
	outcomes will be achieved due to each company choosing their own monitoring plan. It is likely that no			
	consistency will occur as one company may find that land is being recruited only for another to highlight that not			
	enough is being recruited to consider the material controlled or uncontrolled.			
			The Priority Forest	
			Types were	
			developed by the	
			NRA WG using the	
			US FM standard as	
			guidance, along	
			with additional	
			input from	
			stakeholders.	
			These areas were	
			then assessed to	
	The NRA states that the Priority Forest Types were developed based on the FSC US Forest Management list,		determine if they	
	guidance from Proforest, and additional stakeholder input. The NRA again acknowledges that "These Priority		are being	
	Forest Types and associated Control Measures are inherently value-driven, and are based on stakeholder input		threatened by	
	and the Forest Management list of regionally important ecosystems." As with Priority Habitats, the Priority		forest	
	Forest Types do not appear to align with an established ecosystem classification system. Defining Priority Forest		management.	
	Types based on a classification system such as NatureServe Ecological Systems (Comer et al. 2003) or U.S.		Additional	
	National Vegetation Classification Alliances or Associations (Jennings et al. 2009) would strengthen the NRA. One		documentation to	
	advantage of using Associations is that they have been assigned conservation ranks using a consistent and		support the	
	unbiased approach.		justification and	
			rationale for the	
	Some Control Measures require that forests be "harvested in a way that maintains natural stand diversity and		risk designations	
	structure" or maintains the "quality" of the forest type. The term "quality" is subjective, so consideration of		has been provided.	
	"quality" will be difficult. Further, as previously mentioned, forest harvesting by definition alters stand-level		Additionally, the	
	structure, and associated plant and animal communities will change subsequently. Thus, it is unclear how		second draft of the	
	harvesting can be implemented without changing stand-level diversity and structure.		NRA does not	
	The Control Manage of Control		identify specific	
	The Control Measure for Late Successional Bottomland Hardwoods will be challenging to implement. It requires		mitigation actions	
	that "Where stands greater than 80 years old are clearcut or otherwise harvested in a manner that reduces the		within the control	
	quality and quantity of this forest type, it is shown that a commensurate quantity and quality of bottomland		measures, rather a	
	hardwoods are being recruited in the > 80 year age class." It is unclear how this can be implemented when		suite of actions will	
	decisions about harvesting are made by individual landowners who may only have limited area of this forest type		be identified	
0 5 HCV 3	on their property and no information about age-class distribution of bottomland hardwood forests within the broader landscape. A further concern is that this Control Measure is based on the invalid assumption that		through a	
9.5 HCV 3 -	· · · · · · · · · · · · · · · · · · ·		collaborative	
Priority Forest	harvesting of bottomland hardwood forests >80 years old diminishes biodiversity value. While harvesting may change stand age class and structure, it does not diminish biodiversity.		dialogue at a	Economic
Types	Some Control Measures require that forests be "harvested in a way that maintains natural stand diversity and	The NRA should avoid the	regional meeting. The second draft of	LCOHOHHC
	structure" or maintains the "quality" of the forest type. The term "quality" is subjective, so consideration of	use of subjective terms such	the NRA does not	
	"quality" will be difficult. Further, as previously mentioned, forest harvesting by definition alters stand-level	as "quality" when referring	identify specific	
	structure, and associated plant and animal communities will change subsequently. Thus, it is unclear how	to Priority Forest Types, and	mitigation actions	
9.5 HCV 3 -	harvesting can be implemented without changing stand-level diversity and structure.	should ensure that the	within the control	
Priority Forest	narvesting can be implemented without changing stand rever diversity and structure.	Control Measures are	measures, rather a	
Types	The Control Measure for Late Successional Bottomland Hardwoods will be challenging to implement. It requires	practicable.	suite of actions will	Economic
iypes	The control Measure for Late Successional Bottomand Hardwoods will be challenging to implement. It requires	practicable.	Juice of actions will	Leonomic

Priority Forest Types	made by private landowners. It is unrealistic to expect FSC Certificate Holders to maintain or restore any forest type through command and control measures on loggers and landowners.		suite of actions will be identified	Economic
9.5 HCV 3 -	Procurement organizations cannot be held responsible for land use change and forest management decisions		The second draft of the NRA does not identify specific mitigation actions within the control measures, rather a	
9.5 HCV 3 - Priority Forest Types	which wood is bought, it is not possible to have a proof point of "harvested in way that maintains" unless there is reliance on exiting systems and guidelines at a state and federal level. Mesophytic Cove Sites: The control measure is vague, would be difficult to measure, and would be un-auditable. Late Successional Bottomland Hardwood: This control measure is ambiguous as it seems to require a landscape level assessment or inventory of stands that meet the conditions. This beyond the capability of most procurement organizations. Greater than 100 years would be a more appropriate age class. The Control Measure for Late Successional Bottomland Hardwoods will be challenging to implement. It requires that "Where stands greater than 80 years old are clear-cut or otherwise harvested in a manner that reduces the quality and quantity of this forest type, it is shown that a commensurate quantity and quality of bottomland hardwoods are being recruited in the > 80 year age class." It is unclear how this can be implemented when decisions about harvesting are made by individual landowners who may only have limited area of this forest type on their property and no information about age-class distribution of bottomland hardwood forests within the broader landscape. A further concern is that this Control Measure is based on the invalid assumption that harvesting of bottomland hardwood forests >80 years old diminishes biodiversity value. While harvesting may change stand age class and structure, it does not diminish biodiversity. Native Longleaf Pine Savanna: This control measure is not achievable. The FSC control measure states, "where longleaf Pine is harvested in a manner that reduces the quality and quantity of this forest type, it is shown that a commensurate quantity and quality of longleaf pine savannah is being recruited elsewhere." A wood procurement organization cannot go into the complexity of its supply chain to determine at the forest acre level what a landowner has properly decided for their lands. We can		The second draft of the NRA does not identify specific mitigation actions within the control measures, rather a suite of actions will be identified through a collaborative dialogue at a regional meeting.	Economic
9.5 HCV 3 - Priority Forest Types	The cerulean warbler, a species specifically noted by FSC as a species that uses mesophytic cove sites, requires early successional habitat. Requiring the maintenance of "natural standstructure" does not allow for the development of critical habitat for cerulean warblers and would be detrimental to the species. Some of the control measures require that forests be "harvested in a way that maintains natural stand diversity and structure" or maintains the "quality" of the forest type. In a procurement wood organization and the way in	Suggested re-wording if Mesophytic Cove Sites remain as a PFT: Mesophytic cove sites: Stands having mixed- mesophytic characteristics (as defined by Lucy Braun) are harvested in a way that maintains natural stand diversity, including some retention of late- successional elements.	The second draft of the NRA does not identify specific mitigation actions within the control measures, rather a suite of actions will be identified through a collaborative dialogue at a regional meeting.	Economic
	that "Where stands greater than 80 years old are clearcut or otherwise harvested in a manner that reduces the quality and quantity of this forest type, it is shown that a commensurate quantity and quality of bottomland hardwoods are being recruited in the > 80 year age class." It is unclear how this can be implemented when decisions about harvesting are made by individual landowners who may only have limited area of this forest type on their property and no information about age-class distribution of bottomland hardwood forests within the broader landscape. A further concern is that this Control Measure is based on the invalid assumption that harvesting of bottomland hardwood forests >80 years old diminishes biodiversity value. While harvesting may		be identified through a collaborative dialogue at a regional meeting.	

through a collaborative dialogue at a regional meeting. The second draft of the NRA does not identify specific mitigation actions within the control measures, rather a suite of actions will be identified through a collaborative dialogue at a regional meeting. Finally to address your specific question for consultation in this section "what is a reasonable burden of proof to expect CHS to show that where these forest types are harvested there is commensurate recruitment be identified through a classward, and the expectation is that the harvested stand will be regenerated to the same forest type as harvested, and the expectation is that the harvested stand will be regenerated to the same forest type as harvested, we see no need to demonstrate "crecruitment elsewhere". Nothing is changing except the age of the forest type, and that will be dynamic over time anyway. The second draft of the NRA does not identify specific mitigation actions will be identified through a collaborative dialogue at a suite of actions will be identified through a collaborative dialogue at a suite of actions will be identified through a collaborative dialogue at a soulce of actions will be identified through a landowners. It is unrealistic to expect certificate holders to maintain or restore any dialogue at a regional meeting. Economic The second draft of the NRA does not identify specific mitigation actions within the control measures imposed on independent loggers and landowners. The second draft of the NRA does not identify specific mitigation actions within the control within the con
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9.5 Question for Consultation - "Across the landscape" clause Independent private forest landowners. It is unrealistic to expect certificate holders to maintain or restore any forest type through relationships with contractors and control measures imposed on independent loggers and landowners. Independent private forest landowners. It is unrealistic to expect certificate holders to maintain or restore any forest type through relationships with contractors and control measures imposed on independent loggers and landowners. Independent private forest landowners. It is unrealistic to expect certificate holders to maintain or restore any forest type through relationships with contractors and control measures imposed on independent loggers and landowners. Independent private forest landowners. It is unrealistic to expect certificate holders to maintain or restore any forest type through relationships with contractors and control measures imposed on independent loggers and landowners. Economic The second draft of the NRA does not identify specific mitigation actions
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9.5 Question for Procurement organizations cannot be held responsible for land use change and forest management decisions through a
Consultation - made by private landowners. It is unrealistic to expect FSC Certificate Holders to maintain or restore any forest collaborative
"Across the type through command and control measures on loggers and landowners not voluntarily subscribed to the FSC dialogue at a
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the NRA does not
identify specific
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suite of actions will be identified 9.5 Question for through a

			T	
		Consider having one allowed		
		option of monitoring		
		provided for all certificate		
		holders for landscape level		
		control measures so that		
		consistency of auditing and		
		interpretation is clear within		
		each region where		
		landscape level control		
		measures occur. If		
		landscape level monitoring		
		cannot be implemented or		
		designed by the CWWG,		
		-		
		clearly define landscape		
		level characteristics desired	The second draft of	
		within each PFT/HCV and	the NRA does not	
		include several	identify specific	
		characteristics that each	mitigation actions	
1		HCV or priority forest type	within the control	
		needs. Redesign control	measures, rather a	
		measures to include a	suite of actions will	
		maintenance of the	be identified	
9.5 Question for		characteristics present so	through a	
Consultation -	The NRA has failed by prescribing landscape level control measures that are to be implemented via monitoring.	that control measures can	collaborative	
"Across the	The DDS section of the NRA will not be operational given the current wording of some control measures.	have an attainable and	dialogue at a	
landscape" clause	Auditing these control measures against the DDS requirements will not be possible.	measurable outcome.	regional meeting.	Economic
ianuscape ciause	Adulting these control measures against the DDS requirements will not be possible.	measurable outcome.	The second draft of	Leonomic
			the NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
			suite of actions will	
			be identified	
9.5 Question for			through a	
Consultation -			collaborative	
"Across the	The question here should be how any certificate holder could provide this proof; it is almost impossible without		dialogue at a	
landscape" clause	having full control of the FMU and/or implementing FSC STD 30-010.		regional meeting.	Economic
,			The second draft of	
			the NRA does not	
1			identify specific	
1			mitigation actions	
1			within the control	
			measures, rather a	
			suite of actions will	
0.50			be identified	
9.5 Question for			through a	
Consultation -			collaborative	
"Across the	Procurement organizations should not be held responsible for landscape level land use change, and forest		dialogue at a	
landscape" clause	management decisions made by private landowners.		regional meeting.	Economic
	The NRA suggests control measures at the "landscape" level that are not implementable by Certificate Holders.		The second draft of	
9.5 Question for	One control measure suggests that land owners "conduct harvest operations in a manner sufficient to maintain		the NRA does not	
Consultation -	the distribution and extent of mid-seral Jack Pine across the landscape." FSC fails to recognize that landowners		identify specific	
"Across the	are not FSC Controlled Wood certificate holders and have little to no capacity to effect landscape level		mitigation actions	
landscape" clause	management. A further concern is that one of the Control Measures is based upon the invalid assumption that		within the control	Economic
idilascape ciause	management. That their concern is that one of the control weastres is based upon the invalid assumption that		Within the Control	Leonomic

	harvesting of bottomland hardwood forests >80 years old diminishes biodiversity values. While harvesting may change stand age class and structure, it does not diminish biodiversity. Speculative and personal judgments must be removed from the document.	All this talk about longleaf is kind of a moot point. It should be stated to suit	measures, rather a suite of actions will be identified through a collaborative dialogue at a regional meeting. The second draft of the NRA does not identify specific mitigation actions	
9.5 Question for Consultation - "Across the landscape" clause 9.6 HCV 3 - Primary forest &	Proof of recruitment at the landscape level could be provided by organizations like the Longleaf Alliance, state DNRs/Forestry Commissions, NRCS CRP planting programs, periodic review of regional data eg FIA, etc.	IUCN and then cite all the wonderful work taking place to restore the ecosystem and the markets that support the regeneration of the tree by providing economical return. Case closed.	within the control measures, rather a suite of actions will be identified through a collaborative dialogue at a regional meeting.	Economic
9.6 Question for Consultation - Redwood CMs	Of all the forests, old growth and primary forest control measures on public lands should NOT apply to the redwood region because of the regulatory framework in California.	In California, there are multiagency, multi-disciplinary review teams which include on-the-ground inspections and enforcement and mandatory public solicitation of input and comment on every THP. There are strong systems (as well as laws and rules) in place to insure the protection of significant high conservation value (HVCF) areas. The definition of what constitutes a HVCF is very clear. Primary and old growth redwood forests are low risk to be threatened by forest management activities due	The second draft of the NRA designates specified risk for old growth forests on publically-owned lands in the Pacific Coast and Rocky Mountain regions that are not protected (as demonstrated by GAP Status 1 and 2 areas in the USGS PAD US dataset). Additionally, the second draft of the NRA does not identify specific mitigation actions within the control measures, rather a suite of actions will be identified through a collaborative dialogue at a regional meeting.	Economic

		overlay of the California		
		Forest Practice Act and		
		California Forest Practice		
		Rules. These rules require		
		multi-agency, multi-		
		disciplinary review teams		
		and on the ground		
		inspection for every		
		submitted harvest plan.		
		These harvest plans must		
		provide protections for a		
		multitude of values in the		
		forest including extensive		
		watercourse protections		
		(with greater protections for		
		watercourses inhabited by		
		threatened salmonid		
		species); protections for		
		domestic water supplies;		
		protections for endangered		
		and threatened wildlife		
		species and habitat		
		(including protections for		
		late-successional habitat).		
		(California Forest Practice		
		Rules 2014 accessible online		
		at www.fire.ca.gov).		
			The second draft of	
			the NRA designates	
			specified risk for	
			old growth forests	
			on publically-	
			owned lands in the	
			Pacific Coast and	
			Rocky Mountain	
			regions that are	
			not protected (as	
			demonstrated by	
			GAP Status 1 and 2	
			areas in the USGS	
			PAD US dataset).	
			Additionally, the	
			second draft of the	
			NRA does not	
			identify specific	
			mitigation actions	
			within the control	
			measures, rather a	
			suite of actions will	
			be identified	
			through a	
9.6 Question for	It is not practical to apply Primary Forest Control Measures on private lands in the redwood region to all forest		collaborative	
Consultation -	products. The concept of requiring FSC Certificate Holders to force set-asides and preservation of certain forests		dialogue at a	
Redwood CMs	is unrealistic.		regional meeting.	Economic
			0	-

General, Control	Are the control measures reasonably implementable by FSC CoC certificate holders. Point 2, is sadly missing	identify specific	
		I	i
1	regard to the draft control measures: 1) Appropriateness of the Control Measure to protect the species; and 2)	the NRA does not	
	Appropriateness of Control Measures: The question for consultation should address two important issues with	The second draft of	
		regional meeting.	Economic
	is unrealistic.	dialogue at a	
	products. The concept of requiring FSC Certificate Holders to force set-asides and preservation of certain forests	collaborative	
	It is not practical to apply Primary Forest Control Measures on private lands in the redwood region to all forest	through a	
		be identified	
		suite of actions will	
		measures, rather a	
		within the control	
		mitigation actions	
		identify specific	
		NRA does not	
		second draft of the	
		Additionally, the	
		PAD US dataset).	
		areas in the USGS	
		GAP Status 1 and 2	
		demonstrated by	
		not protected (as	
		regions that are	
		Rocky Mountain	
		Pacific Coast and	
		owned lands in the	
		on publically-	
		old growth forests	
		specified risk for	
		the NRA designates	
Neuwood CIVIS	CUILIUI IIICASUICS.	regional meeting. The second draft o	
Redwood CMs	control measures.		Economic
Consultation -	Each FMU needs to be evaluated separately to determine if all species or just redwood specifically should follow	dialogue at a	
9.6 Question for		collaborative	
		through a	
		be identified	
		suite of actions will	
		measures, rather a	
		within the control	
		mitigation actions	
		identify specific	
		the NRA does not	
	2 2 party mass areas massing to have the company new ager parenase tracematerials	The second draft of	
	wherein one company must avoid material only to have the company next door purchase that material.	regional meeting.	Economic
	Monitoring developed by one company will be subject to auditor's approval, leading to inconsistent approaches	dialogue at a	
		collaborative	
		through a	
		be identified	
		suite of actions will	
		measures, rather a	
		within the control	
		mitigation actions	
		identify specific	
		the NRA does not	
		The second draft or	

	protection activity, but if it is not feasible to implement, then it has no value.	within the control	
	The draft control measures are demonstrated evidence that FSC US has lost sight of the intent of the Controlled	measures, rather a	
	Wood Standard, and instead has turned it into the equivalent of the FSC Standards for Forest Management,	suite of actions will	
	imposed indirectly through FSC Chain of Custody Certificate Holders and independent suppliers.	be identified	
	, , , , , , , , , , , , , , , , , , , ,	through a	
		collaborative	
		dialogue at a	
		regional meeting.	
Part 3: Conversion I	Risk Assessment and Control Measures		
		FSC has clearly	
		articulated that the	
		consideration of	
		risk of materials	
		from areas of	
		conversion is	
		required, even if	
		the conversion is	
		not due to forest	
		management	
		activities. The	
	Secretary and the secretary an	second draft of the	
	Conversion Risk Assessment: The conversion of forestland to other land uses is not a forest products demand	NRA limits the	
I. Introduction &	driven issue. If anything, strong demand for forest and paper products provides landowners with an incentive to	areas of specified	
Summary	keep their lands in forest cover and production.	risk.	Economic
		FSC has clearly	
		articulated that the	
		consideration of	
		risk of materials	
	The conversion of forestland to other land uses is not a forest products demand driven issue. If anything, strong	from areas of	
	demand for forest and paper products provides landowners with a positive incentive to keep their lands in forest	conversion is	
	cover and production. Disagree with requirements that some conversion sources are not allowed as controlled	required, even if	
	wood fiber input. Land use decisions are made by private corporate and family forest landowners in the United	the conversion is	
	States based upon economic returns, long-term management planning, and landowner objectives for property	not due to forest	
	they own. Imposing vague and arbitrary land use controls such as acreage size restrictions for legal land	management	
	conversions, may cause conversion wood fiber not to be utilized when harvested during land use change and left	activities. The	
	behind as waste versus being utilized the circular economy. Certified organizations will have to find alternative	second draft of the	
	fiber to replace wasted conversion sources, creating accelerated harvesting of other forests. Certain land	NRA limits the	
Introduction 0			
I. Introduction &	coversions (such as mining) will occur regardless of requirements to exlude it as controlled wood source.	areas of specified	Foonemic
Summary	Conversion sources should be allowed as controlled wood input.	risk.	Economic
	The conversion of forestland to other land uses is not a forest products demand driven issue. If anything, strong	FSC has clearly	
	demand for forest and paper products provides landowners with a positive incentive to keep their lands in forest	articulated that the	
	cover and production.	consideration of	
		risk of materials	
	Disincentives to the maintenance of forest cover include regulatory forestry policies that cause landowners to	from areas of	
	conclude that keeping their lands in forestry is a poor investment decision. The FSC US National Risk	conversion is	
	Assessment, with its proposed Control Measures and associated costs/burdens on landowners and procurement	required, even if	
	organizations, will have the unfortunate effect of causing more forest conversion.	the conversion is	
	_	not due to forest	
	As private U.S. landowners discover that FSC US is attempting to indirectly and involuntarily involve them in the	management	
	FSC US Forest Management Standard, they will maintain their distance from the FSC Program. FSC Certificate	activities. The	
I. Introduction &	Holders access private lands by permission only and are guests of the landowner while on their property. It is	second draft of the	
			Economic
Summary	inconceivable that FSC Certificate Holders would become regulators of private forest management and land use	NRA limits the	Economic

	,			
	planning to address totally new and unfounded conservation and preservation objectives.		areas of specified	
			risk. Additionally,	
	FSC Chain of Custody Certificate Holders that purchase wood from independent entities and work with private		the CMs include	
	landowners will likely drop their FSC Controlled Wood Certificates and any influence that FSC may have had, will		the use of regional	
	be permanently lost.		collaborative	
			dialogues that will	
			include all	
			interested	
			stakeholders,	
			including non-	
			certified	
			landowners.	
			The second draft of	
			the NRA contains	
			control measures	
			where the exact	
			mitigation actions	
			will be determined	
	Mood from Conversion (2.4.4.1 and 2.4.4.2)		during a	
	Wood from Conversion (3.4.4.1 and 3.4.4.2)		collaborative	
	These indicators serve a useful role, and correctly note that de minimis levels of conversion may occur. However,		dialogue at a	
	it is not clear how the monitoring and evaluation component of these programs would be completed by		regional meeting.	
	companies attempting to meet these requirements, and it may prove to be impossible or unduly burdensome.		Therefore,	
	U.S. facilities source from hundreds to thousands of private timberland owners in a year. Landowners are under		monitoring and	
	no legal obligation to disclose the intent of their forest activities. Certificate holders easily could be put in the		evaluation are not	
I. Introduction &	untenable position of having, in good faith, purchased and utilized what they believed to be low-risk material,		explicitly included	
Summary	and then, after the fact, finding out that this was not the case and being forced to take corrective action.		in the second draft.	Economic
			Thank you for your	
			comment.	
			Additional analysis	
			has been carried	
			out and this	
			documentation	
			and rationale for	
			the risk	
			designations have	
			been incorporated	
I. Introduction &	Conversion section of the risk assessment is adequate -		into the second	
Summary	Comments were made above regarding inconsistency of acceptable conversion areas, etc		draft of the NRA.	Economic
,			FSC has clearly	
			articulated that the	
			consideration of	
			risk of materials	
			from areas of	
			conversion is	
			required, even if	
	The draft NRA would block mills from buying wood salvaged from forest land converted to another land use, if		•	
	, 6		the conversion is	
	the area converted is larger than 40 acres in size. It is unclear how this would be implemented, particularly		not due to forest	
	whether the 40-acre reference means contiguous acres, a single geographic area, one forest owner, one		management	
	purchaser, one transaction, one FSC certificate, or one single year. Another concern is whether the forest		activities. The	
	owner's intent will have to be documented and if so, in what manner. Documentation would be a significant		second draft of the	
	intrusion in both a business transaction and property ownership. This is both unrealistic and inappropriate,		NRA limits the	
	especially in the absence of a compelling need: the NRA's analysis shows that conversion of forest land is not a	Re-evaluate the criteria and	areas of specified	
I. Introduction &	major problem in the US. And nothing in the NRA suggests that a boycott of salvaged wood would have any	results related to	risk. Additionally,	
Summary	effect on the levels of land use change, which is driven by other factors, not the value of the salvaged wood.	conversion.	the CMs include	Economic

			the use of regions!	
			the use of regional	
			collaborative	
			dialogues that will	
			include all	
			interested	
			stakeholders,	
			including non-	
			certified	
			landowners.	
			FSC has clearly	
			articulated that the	
			consideration of	
			risk of materials	
			from areas of	
			conversion is	
			required, even if	
	The conversion of forestland to other land uses is not a forest products demand driven issue. If anything, strong		the conversion is	
	demand for forest and paper products provides landowners with a positive incentive to keep their lands in forest		not due to forest	
	cover and production.		management	
	cover and production.		activities. The	
	Disincentives to the maintenance of forest cover include regulatory forestry policies that cause landowners to		second draft of the	
	conclude that keeping their lands in forestry is a poor investment decision. The FSC US National Risk		NRA limits the	
	Assessment, with its proposed Control Measures and associated costs/burdens on landowners and procurement		areas of specified	
			•	
	organizations, will have the unfortunate effect of causing more forest conversion.		risk. Additionally,	
	As a state of the		the CMs include	
	As private U.S. landowners discover that FSC US is attempting to indirectly and involuntarily involve them in the		the use of regional	
	FSC US Forest Management Standard, they will maintain their distance from the FSC Program. FSC Certificate		collaborative	
	Holders access private lands by permission only and are guests of the landowner while on their property. It is		dialogues that will	
	inconceivable that FSC Certificate Holders would become regulators of private forest management and land use		include all	
	planning to address totally new and unfounded conservation and preservation objectives.		interested	
			stakeholders,	
	FSC Chain of Custody Certificate Holders that purchase wood from independent entities and work with private		including non-	
I. Introduction &	landowners will likely drop their FSC Controlled Wood Certificates and any influence that FSC may have had, will		certified	
Summary	be permanently lost.		landowners.	Economic
			The second draft of	
			the NRA maintains	
			the distinction	
			between natural	
			forest, semi-	
			natural forest and	
			plantations, but	
			directs users to the	
			FSC US Plantation	
			guidance for	
		Encourage this rational to	assistance.	
		continue to be included with	Additional	
		the allowance of material	clarification has	
		from conversion exemptions	been included to	
		being allowed. Use of this	further explain that	
		fiber is much better than	just because a	
		burning and landfilling so	stand is planted, it	
I. Introduction &	Exemption allowing small holders (20 acs) to convert to plantations will allow them to realize more productivity	long as we are not	is not necessarily a	
Summary	for their forest and in turn the property will remain in forest longer.	encouraging conversion.	plantation.	Economic
II. Conversion	The prohibition on buying wood from landowners who convert 20 acres of forest to "plantations" has similar	ccoaraging conversion.	The second draft of	23011011110
Framework	problems. Forest owners in the US manage native species, which don't appear to be viewed as plantations under		the NRA maintains	Economic
Trainework	problems, rolest owners in the 03 manage native species, which don't appear to be viewed as plantations under		THE INDA HIGHITAINS	Economic

	FSC's definitions. In any case it will not be known if they meet the plantation definition for some years after planting, when and if they fail to develop the "principal characteristics and key elements" of natural forest systems. So the risk of conversion will be low and generally not measurable at the time of logging. The NRA does not explain how these issues will be addressed, issues such as intent and documentation. This is also an unworkable restriction that isn't justified under the NRA.		the distinction between natural forest, semi- natural forest and plantations, but directs users to the FSC US Plantation guidance for assistance. Additional clarification has been included to further explain that just because a stand is planted, it is not necessarily a plantation.	
III. Explanatory			•	
Materials				
3.1 Conversion				
Context				
3.2 Conversion Datasets				
Datasets			The data-driven	
			approach to	
			assessing	
			conversion in the	
			first draft was	
			inconclusive, so a	
			qualatative	
			literature review	
	These are difficult to understand. I'm not sure what the difference between gross and net acres presented are?	Exclude tables or provide an	was carried out to	
	Labelling the tables and providing more background information so I know what I am looking at would help. Also,	explanation of the	determine the risk	
3.3 Conversion	what is the baseline for comparison in these tables – it's not really clear. More clarity on these are called for – or	information found within	of conversion at a	
Results	exclude them – because they don't really provide much information without further discussion as is.	the tables.	finer scale.	Economic
	RMS does not agree with or support the two tiered De Minimis exemption from conversion. It defies logic that		The second draft of	
	FSC would accept 40 acres as de minimis for a conversion of a forested tract to a non-forested use, while using		the NRA maintains	
	20 acres as the upper acceptable de minimis threshold for a forested tract to a plantation. It defies logic that		the distinction	
	the stricter threshold for conversion of a forested tract to a plantation is because the "conversion to plantation is		between natural	
	a forestry decision". We would put forth that both decisions are likely economic decisions. We further put forth		forest, semi-	
	a forested plantation offers far more ecological benefits and forest related economic values than an asphalted parking lot, a strip mall or a subdivision. Further, exempting specific areas such as urban infill, public benefits, or		natural forest and	
	FSC certified mills seems to be a change in philosophy for FSC, and one that seems to benefit certain		plantations, but directs users to the	
	stakeholders at the expense of others. We agree with the concept of de minimis, we agree some conversion		FSC US Plantation	
	should be allowed without introducing high risk wood into the system; what we disagree with is the sliding scale		guidance for	
	against forest plantations and for addressing certain activities. We urge FSC to adopt a consistent approach; e.g.,		assistance.	
	XX acres or XX% acres are considered de minimis or exempt for purposes of conversion, which seems to be the		Additional	
	approach outlined in the Conversion Risk Assessment Framework.		clarification has	
			been included to	
	RMS does not agree with the concept expressed that a natural forest is better ecologically that a plantation.		further explain that	
	We offer as a case in point two loblolly pine stands 25 years of age in numerous southern states. One stand is		just because a	
	loblolly that was regenerated naturally; the other a loblolly stand that was planted. Both stands have been		stand is planted, it	
IV. DDS	thinned over time, both have had chemical treatments to reduce woody competition and both have been		is not necessarily a	
Justification	fertilized. Almost any visitor to the two stands could not identify any significant ecological differences between		plantation. The	Economic

	the two stands. Yet, under the NRA, wood from the natural stand is low risk, wood from the planted stand may	control measure	;
	be high risk. This scenario can be repeated in other forest types across the country as well. FSC does not place	require a compa	ıy
	this same level of risk on plantations in other countries; we struggle to understand the scientific rationale for this	to include the	
	higher level of risk associated with plantations in the US.	following	
	·	statement in	
	RMS cannot determine at what point a plantation is considered a "conversion" and therefore high risk. The	educational	
	FSC US Forest Management Standard does at least define certain plantations as being "established after 1994"	materials:	
	as not being eligible for certification. Does that still stand in terms of the NRA? Or are all P10 plantations	materials.	
	· · · · · · · · · · · · · · · · · · ·		
	considered "high risk" regardless of year of establishment? We ask FSC for clear and consistent language with		
	regards to plantations and associated risk as related to this NRA.		
		"Any conversion	
		forest to plantat	
		or non-forest us	
		may have negati	ve
		impacts on socia	,
		economic and/o	
		environmental	
		values. However	
		the greatest risk	
		materials from	
		conversions	
		entering the sup	alv
		chain is from larg	-
		conversions.	CI
		Therefore, to	
		minimize the rish	
		of adverse impa	
		from conversion	
		and the risk of	
		materials from	
		conversions	
		entering the FSC	
		supply chain, we	
		will not accept	
		materials from	
		converted forest	
		areas that are	
		greater than 100	
		acres (40.5	
		hectares)."	
		The second draft	of
		the NRA maintai	
		the distinction	13
	Cuitavio for forest convenien. The applicable viet entering for forest convenient and the large transfer.	between natural	
	Criteria for forest conversion. The applicable risk criteria for forest conversion appears to have been changed to	forest, semi-	
	an outright ban, recognizing the de minimus exemption, on using wood from any conversion of natural or semi-	natural forest an	u
	natural forests to other uses, regardless of spatial scale or the reason for conversion. Such a standard would be	plantations, but	. 1
	difficult to enforce and in many cases would not further the core principles of FSC. In order to further FSC's goals,	directs users to t	
	the treatment of wood from converted forests requires a more nuanced approach that truly seeks to identify	FSC US Plantatio	ו
	and minimize risks in regions where forest lands are systematically being lost to other uses due to poor	guidance for	
	management or misaligned economic incentives. At a minimum, FSC would be better served to retain the	assistance.	
	existing indicator of losses to forest land not exceeding 0.5% per year at the eco-regional level. With respect to	Additional	
	the de minimus exemption, it is illogical that the exemption would be larger for forests converted to non-forest	clarification has	
IV. DDS	use than for those converted to plantations. This suggests that FSC deems it more conducive to convert forests	been included to	
Justification	to non-forests than to have trees on the landscape in the form of a plantation.	further explain t	nat Economic
			1

			:	
			just because a	
			stand is planted, it	
			is not necessarily a	
			plantation. The	
			control measures	
			require a company	
			to include the	
			following	
			statement in	
			educational	
			materials:	
			"Any conversion of	
			forest to plantation	
			or non-forest use	
			may have negative	
			impacts on social,	
			economic and/or	
			environmental	
			values. However,	
			the greatest risk of	
			materials from	
			conversions	
			entering the supply	
			chain is from larger	
			conversions.	
			Therefore, to	
			minimize the risk	
			of adverse impacts	
			from conversion,	
			and the risk of	
			materials from	
			conversions	
			entering the FSC	
			supply chain, we	
			will not accept	
			materials from	
			converted forest	
			areas that are	
			greater than 100	
			acres (40.5	
			hectares)."	
	The average conversion size to add one irrigation system is 100ac. This is a very common type of land clearing			
	for past used agricultural land in the US.			
	In the US as landowners have become larger and larger it is not uncommon for a large agricultural landowner to		The control	
	plant in trees or let fallow his fields according to commodity pricing and his long term plans. The NRA DDS	Change conversion for	measures require a	
	threshold does not accurately allow for this to occur. The landowner is making this decision and thus there will	agriculture to allow for	company to	
	be no real impact on the ground from the implementation of this control measure. The land where this is	flexibility of past used	include the	
	occurring may have been converted to agriculture a few times over the last 200 years and land will continue to	agricultural land to be	following	
	swing back and forth. Because agriculture has the same 'bigger is better' mentality this standard will be unfairly	brought back into	statement in	
IV. DDS	implemented in the southern states compared to the northern states that have the same conversion happening	agriculture use at any size	educational	
Justification	at a smaller tract and landowner size.	threshold.	materials:	Economic
			"Any conversion of	,
			forest to plantation	
			or non-forest use	
	1		טי ווטוו-וטופגנ עגפ	

may have negati impacts on social impacts of social impacts on social impacts on social impacts on social impacts on social impacts on social impacts on social impacts on social impacts on social impacts on social impacts on social impacts of social impacts on social impacts on social impacts on social impacts on social impacts on social impacts on social impacts of social impacts on soc	
impacts on socia	
Impacts on social	ıl,
economic and/o	r
environmental	
values. However	,
the greatest risk	of
materials from	
conversions	
entering the sup	inly
chain is from lar	* *
conversions.	501
Therefore, to	
minimize the ris	
of adverse impa	
from conversion	,
and the risk of	
materials from	
conversions	
entering the FSC	:
supply chain, we	
will not accept	
materials from	
converted fores:	:
areas that are	
greater than 100	,
acres (40.5	´
hectares)."	
V. Estimates from	
datanalysis	
RMS urges FSC to address the inherent bias against plantations, eliminate the "two tier" definition plantations	
currently used, and take a clear position that includes wood from all plantations as low risk. The FSC definition of	
plantation as "a stand that lacks the principal characteristics and key elements of natural forest systems" and the	
statement "FSC does not consider all planted stands as plantations" is at its essence wordplay to game the	
certification system rather a definition consistent with Society of American Forestry (SAF) principles and	
practices or long standing forest management teachings in dozens of accredited university forestry programs	
across the United States. Further, this "two tier" system can and will in many cases lead to a planted "semi The second draf	t of
natural forest" of the present being a "plantation" of tomorrow. As a specific example, RMS harvests a planted the NRA maintai	
loblolly pine stand today that has in place an herbaceous species component, a mid-story hardwood component, the distinction	
and the overstory of loblolly pine. FSC would clearly state this stand, prior to harvest, has key characteristics and between natura	
elements of a natural forest system, hence its designation as a semi-natural forest. RMS uses chemicals to site forest, semi-	
<u> </u>	.d
reduce competing vegetation. We later apply fertilizer to the loblolly pines to stimulate their growth. We use	
and rely on chemicals and herbicides, thus FSC now considers this to be a plantation. Under the criteria directs users to	
	n
proposed, and the current "two tier" FSC plantation designation, we have converted a semi-natural stand to a FSC US Plantation	
plantation; hence wood from this conversion is high risk. And 28 years later, at time of harvest, the "plantation" guidance for	
plantation; hence wood from this conversion is high risk. And 28 years later, at time of harvest, the "plantation" guidance for	
plantation; hence wood from this conversion is high risk. And 28 years later, at time of harvest, the "plantation" guidance for again looks and has the characteristics of a "semi-natural forest". This example is not farfetched, it is reality on assistance.	
plantation; hence wood from this conversion is high risk. And 28 years later, at time of harvest, the "plantation" again looks and has the characteristics of a "semi-natural forest". This example is not farfetched, it is reality on millions of acres across the southern United States today. Further, it is fact that an auditor or a FSC stakeholder could use either designation on these millions of acres at any point in time in a manner that best suited their clarification has	
plantation; hence wood from this conversion is high risk. And 28 years later, at time of harvest, the "plantation" again looks and has the characteristics of a "semi-natural forest". This example is not farfetched, it is reality on millions of acres across the southern United States today. Further, it is fact that an auditor or a FSC stakeholder could use either designation on these millions of acres at any point in time in a manner that best suited their clarification has interests at that time. We take note of the statement in 3.1.2 "There is no practical way to distinguish FSC- been included to	
plantation; hence wood from this conversion is high risk. And 28 years later, at time of harvest, the "plantation" again looks and has the characteristics of a "semi-natural forest". This example is not farfetched, it is reality on millions of acres across the southern United States today. Further, it is fact that an auditor or a FSC stakeholder could use either designation on these millions of acres at any point in time in a manner that best suited their clarification has interests at that time. We take note of the statement in 3.1.2 "There is no practical way to distinguish FSC-Plantations from natural or semi-natural forests using readily available data sets". This statement strongly	
plantation; hence wood from this conversion is high risk. And 28 years later, at time of harvest, the "plantation" again looks and has the characteristics of a "semi-natural forest". This example is not farfetched, it is reality on millions of acres across the southern United States today. Further, it is fact that an auditor or a FSC stakeholder could use either designation on these millions of acres at any point in time in a manner that best suited their interests at that time. We take note of the statement in 3.1.2 "There is no practical way to distinguish FSC-Plantations from natural or semi-natural forests using readily available data sets". This statement strongly supports our position that the FSC "semi-natural" and "plantation" designations are not based on any widely just because a	hat
plantation; hence wood from this conversion is high risk. And 28 years later, at time of harvest, the "plantation" again looks and has the characteristics of a "semi-natural forest". This example is not farfetched, it is reality on millions of acres across the southern United States today. Further, it is fact that an auditor or a FSC stakeholder could use either designation on these millions of acres at any point in time in a manner that best suited their clarification has interests at that time. We take note of the statement in 3.1.2 "There is no practical way to distinguish FSC-Plantations from natural or semi-natural forests using readily available data sets". This statement strongly supports our position that the FSC "semi-natural" and "plantation" designations are not based on any widely just because a accepted forestry system in the US today. Thus, we urge FSC to adopt clear language around plantations, adopt	it it
plantation; hence wood from this conversion is high risk. And 28 years later, at time of harvest, the "plantation" again looks and has the characteristics of a "semi-natural forest". This example is not farfetched, it is reality on millions of acres across the southern United States today. Further, it is fact that an auditor or a FSC stakeholder could use either designation on these millions of acres at any point in time in a manner that best suited their interests at that time. We take note of the statement in 3.1.2 "There is no practical way to distinguish FSC-Plantations from natural or semi-natural forests using readily available data sets". This statement strongly supports our position that the FSC "semi-natural" and "plantation" designations are not based on any widely just because a	it it

	RMS takes strong exception to the language "Category 4 – Conversion: The Organization shall implement a		
	system designed to avoid, including through language in the Controlled Wood Policy and supplier agreements,		
	material from land where natural forest cover is being converted to non-forest uses or plantations". We have		
	previously noted our concerns with language around plantations; yet this section raises the bias against		
	plantations to a new level. Quoting from 4.1: "Plantationslack most of the principle characteristics and key		
	elements of natural forestsThe following are examples of stand types that are considered plantations:Block		
	plantings of cloned trees resulting in a major reduction of within-stand diversityStands established through		
	hydrological modification, including the installation of pattern ditching, that affects the water table and resulting		
	stand hydrology." How does, or how will FSC define a "cloned tree"? Are mass clonal pollinated (MCP) loblolly		
	pine seedlings considered "cloned trees"? How will FSC interpret "stands established through hydrological		
	modification? RMS manages hundreds of thousands of acres that are planted on sites that have pattern ditching		
	or hydrological modification, some of which dates back over 100 years. Some of these sites have been in loblolly		
	pine for decades. Is wood from these sites suddenly "high risk"? What about forest stands outside a river levee		
	system? These forest stands are in existence at least in part because of hydrological modification. What about		
	forest stands on tracts where the US Army Corps of Engineers has altered the hydrology of the Region? Private		
	forest landowners across the southern US have millions of acres of lands that fall into this category, whether		
	along the White and Arkansas Rivers in Arkansas, or the Tennessee Tombigbee River in Alabama and Mississippi,		
	to the Santee and Cooper Rivers in South Carolina. We have strong concerns about wood from long standing		
	forests suddenly becoming "high risk" and expressly addressed as such in supplier agreements.		
	,	The second draft of	
		the NRA maintains	
		the distinction	
		between natural	
		forest, semi-	
		natural forest and	
		plantations, but	
		directs users to the	
		FSC US Plantation	
		guidance for	
		assistance.	
		Additional	
	The FSC US definition of "forest plantations" in the FSC Controlled Wood Standard NRA is more stringent than	clarification has	
	the FSC Forest Management Standard. Federal and state laws and regulations consider forest plantation land in	been included to	
	the US to be a sustainable, accepted silviculture practice. Plantations are established in compliance with the	further explain that	
	Clean Water Act, Endangered Species Act, and other laws and regulations enforced by the Envionmental	just because a	
	Protection Agency, Army Corps of Engineers, Fish and Wildlife Service and other federal and state agencies. The	stand is planted, it	
Comoral		• •	
General,	arbitrary limit of 20 acres or less for plantation conversion is unrealistic and not based on accepted, legal forest	is not necessarily a	F
Plantations	practices currently followed in the US.	plantation.	Economic
	FCC US has and fined and auromated UFF mark Dispatch and fine of the deficition of t	The second draft of	
	FSC US has redefined and expanded "Forest Plantations" from the definition contained in the FSC US National	the NRA maintains	
	Forest Management Standard. Thus, the Controlled Wood Standard has become more stringent than the	the distinction	
	Standard intended for landowners that volunteer to implement the FSC Forest Management Standard.	between natural	
		forest, semi-	
	FSC US is inconsistent with US and State laws and regulations that consider forest plantations in the U.S. as being	natural forest and	
	"Normal Silvicultural" practices defined in U.S. Clean Water Act regulations. EPA and Corps of Engineers	plantations, but	
	regulations consider "Normal Silviculture" as including minor drainage, bedding and reforestation of appropriate	directs users to the	
	tree species.	FSC US Plantation	
	FSC US fails to recognize that the growing of mature trees itself "alters stand hydrology" and "affects the water	guidance for	
	table." Upon harvesting and removal of trees in wetter areas, water tables rise to the surface and preclude	assistance.	
	regeneration of the forest, if normal silvicultural practices are not implemented. Minor drainage, bedding and	Additional	
	other normal silvicultural practices are necessary to accomplishing adequate reforestation and good forest	clarification has	
		been included to	
	management.		
Comoral	FCC USIs arbitrary limits of 30 ages or loss for plantations is unrealistic and at the angle of formula in	further explain that	
General,	FSC US's arbitrary limits of 20 acres or less for plantations is unrealistic and not based on the reality of forestry in	just because a	Fir
Plantations	the US context. There is no stated rationale or basis for such a small acreage size limitation.	stand is planted, it	Economic

			plantation.	
			The second draft of	
			the NRA maintains	
			the distinction	
			between natural	
			forest, semi-	
			natural forest and	
			plantations, but	
			directs users to the	
			FSC US Plantation	
			guidance for	
			assistance.	
	Plantation Definition: The guidance provided is helpful, but there is still not enough guidance to determine on		Additional	
	the ground, and consistently among different certificate holders, what constitutes a plantation in the U.S.		clarification has	
	context. Based on the indicators given, it is not possible to make definitive classifications. This is an extremely		been included to	
	important definition, with many important ramifications in the NRS.		further explain that	
	Annex B indicates "This intent should be used as a framework to guide regional decision-making in lieu of		just because a	
	additional FSC-US guidance specific to regions & forest types." Who is involved in "regional decision-making,"		stand is planted, it	
General,	when will this take place, & what will be the forum? How will it be ensured that such decisions are documented		is not necessarily a	_
Plantations	and implemented consistently?		plantation.	Economic
			The second draft of	
			the NRA maintains	
			the distinction	
			between natural	
			forest, semi- natural forest and	
			plantations, but	
			directs users to the	
			FSC US Plantation	
			guidance for	
			assistance.	
			Additional	
			clarification has	
		Remove all plantation	been included to	
	The FSCUS guidance on plantations has been revised and is subject to change or will change as FSC motions and	examples that are in place	further explain that	
	FSCUS standards change. The NRA calls out the plantation guidance and provides examples on what is	within NRA and control	just because a	
	considered a conversion to plantation. It would be imprudent to place wording within the NRA only to have the	measures and highlight that	stand is planted, it	
General,	wording that is acceptable change. Current examples given in the document have had exceptions allowed across	FSCUS plantation guidance	is not necessarily a	
Plantations	the US forest management portfolio.	should be followed.	plantation.	Economic
			The second draft of	
			the NRA maintains	
			the distinction	
			between natural	
			forest, semi-	
			natural forest and	
			plantations, but	
	The collings and the college and the college are the college at the collings at the college at t		directs users to the	
	The prohibition on buying wood from landowners who convert 20 acres of forest to "plantations" has similar		FSC US Plantation	
	problems. Forest owners in the US manage native species, which don't appear to be viewed as plantations under		guidance for	
	FSC's definitions. In any case it will not be known if they meet the plantation definition for some years after		assistance.	
	planting, when and if they fail to develop the "principal characteristics and key elements" of natural forest		Additional	
Conoral	systems. So the risk of conversion will be low and generally not measurable at the time of logging. The NRA		clarification has	
General,	does not explain how these issues will be addressed, issues such as intent and documentation. This is also an		been included to	Economic
Plantations	unworkable restriction that isn't justified under the NRA.		further explain that	Economic

r		1		
			just because a	
			stand is planted, it	
			is not necessarily a	
			plantation. FSC has	
			clearly articulated	
			that the	
			consideration of	
			risk of materials	
			from areas of	
			conversion is	
			required, even if	
			the conversion is	
			not due to forest	
			management	
			activities.	
		Suggest re-writing this	The second draft of	
		exception to say. "Instances	the NRA maintains	
		of conversion of natural or	the distinction	
		semi-natural forest to	between natural	
1		intensively established and	forest, semi-	
		managed plantations in the	natural forest and	
	The exception for a conversion of natural or cominatural forest to plantations is not broad encurs and tonds to			
1	The exception for a conversion of natural or semi-natural forest to plantations is not broad enough and tends to	coastal plain and lower	plantations, but directs users to the	
	assume that all plantations are intensively managed which may include practices such as bedding, fertilization	piedmont shall be limited to		
	and herbicide use. Many plantations that are established outside of the coastal plain and lower piedmont are	50 acres or less. Plantations	FSC US Plantation	
	not intensively managed at all and should not be considered a conversion. On upper piedmont and mountain	established in the upper	guidance for	
	properties in the eastern and south eastern US most plantations are established on poor mixed hardwood and	piedmont and mountains of	assistance.	
	pine sites. There is no bedding or fertilization and herbicides are not generally used. Usually natural hardwood	the eastern and south	Additional	
	regeneration will be intermingled with the planted pines. These plantings are also widely scattered and are not	eastern US shall not be	clarification has	
	common practice on the landscape. The rotation age is generally also much longer than 15 to 20 years as is	considered a conversion if	been included to	
	common in the intensively managed plantations of the coastal plain and lower piedmont.	bedding, fertilization and	further explain that	
		herbicides are not used in	just because a	
	Also, plantations are defined to be forest areas, "that lack most of the principle characteristics and key elements	the establishment or	stand is planted, it	
General,	of natural forests." Principle characteristics and key elements of forests are not defined in any of the FSC	management of the	is not necessarily a	
Plantations	standards. While we all know what FSC is driving at, it should be better defined.	plantation."	plantation.	
			The second draft of	
			the NRA maintains	
			the distinction	
			between natural	
		Remove the third bullet in	forest, semi-	
		the Note that states: "Stands	natural forest and	
		established through	plantations, but	
		hydrological modification,	directs users to the	
		including the installation of	FSC US Plantation	
		pattern ditching, that affects	guidance for	
		the water table and resulting	assistance.	
		stand hydrology"	Additional	
1		There is no explanation for	clarification has	
		this change and it would	been included to	
		appear that the change has	further explain that	
	By including the bullet that describes plantations as "Stands established through hydrological modification,	been made to satisfy a single	just because a	
	including the installation of pattern ditching, that affects the water table and resulting stand hydrology", FSC US	stakeholder group, rather	stand is planted, it	
General,	has redefined and expanded the current definition of plantations as described in the FSC US Forest Management	than in the best interests of	is not necessarily a	
Plantations	Standard.	advancing the standard.	plantation.	Economic
General,	The prohibition on buying wood from landowners who convert 20 acres of forest to "plantations" has similar		The second draft of	
Plantations	problems. Forest owners in the US manage native species, which don't appear to be viewed as plantations under		the NRA maintains	Francmic
i iaiitatiUIIS	problems, rolest owners in the os manage harive species, which don't appear to be viewed as plantations under		the MINA HIGHILANIS	Economic

FSC's definitions. In any case it will not be known if they meet the plantation definition for some years after	the distinction	
planting, when and if they fail to develop the "principal characteristics and key elements" of natural forest	between natural	
systems. So the risk of conversion will be low and generally not measurable at the time of logging. The NRA	forest, semi-	
does not explain how these issues will be addressed, issues such as intent and documentation. This is also an	natural forest and	
unworkable restriction that isn't justified under the NRA.	plantations, but	
	directs users to the	
	FSC US Plantation	
	guidance for	
	assistance.	
	Additional	
	clarification has	
	been included to	
	further explain that	
	just because a	
	stand is planted, it	
	is not necessarily a	
	plantation.	