



Simulated Field Test Results

FSC US Draft National Forest Stewardship Standard Process and Findings Report

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FSC US Draft NFSS Simulated Field Test EXECUTIVE SUMMARY

Cambium Consulting conducted a series of nine simulated field tests over the course of two weeks in August 2022. Field tests involved volunteer certificate holders (CH) and certification body (CB) representatives for selected elements of the Draft FSC US NFSS (v2.0) identified by the FSC US Standard Development Group (SDG). The primary purpose of the simulated field tests was to identify any “friction points” and “critical failures” in the draft standard.

Each field test included one or more representatives from a CH, a team of three CB representatives, and representatives from Cambium Consulting as facilitators. Additionally, members of FSC US Staff, and SDG were invited to participate as observers. CHs represented a range of ownership types, certificate types, and geographic region, and CB representatives included expertise associated with a qualified audit team including social issues, forest and wildlife ecology, and forestry.

Simulated field tests were conducted remotely using an on-line video conferencing platform. All participants were instructed to familiarize themselves with all relevant aspects of the standard to be evaluated including selected criteria, indicators, applicability and guidance, annexes, definitions and other relevant standards. CHs were asked to provide their interpretations of requirements, a self-assessment of conformance (and anticipated changes required if not in conformance), and a description of evidence they would present to auditors in order to demonstrate conformance (actual evidence was not requested or provided). CB representatives then presented their perspectives noting any consistencies or inconsistencies with the interpretations of the CHs. Consultants then facilitated any discussions regarding each indicator.

Potential “Critical Failures”, “Friction Points” and challenges to auditability were noted from discussions related to each indicator. Friction Points represent conflicting or diverging interpretations of requirements or evidence of conformance between CHs and CBs. Potential Critical Failures represent areas where CHs foresee a potential inability to conform to requirements due to legal, liability, economic, and other constraints.

OVERVIEW OF RESULTS – NFSS FIELD TESTS

Many of the indicators were clear and had consistent interpretation among CHs and CBs. However, the field test resulted in noted challenges related to the draft standard. The following list is a high-level summary of areas we note as having Friction Points or Potential Critical Failures:

- Requirements outside the control of CHs: participants noted multiple cases where requirements were beyond their ability to control or influence behavior, especially regarding indicators associated with independent contractors and their employees or sub-contractors. The issue was compounded for group certificate managers. Many CHs claim such requirements contradict US federal laws requiring arm’s length relationships with independent contractors.
- Use of the terms “contract” and “contractor”: there is persistent confusion regarding the scope of requirements especially as they related to purchase agreements and minor or sometimes informal work agreements. The issue is compounded in group management and family forests.

- Use of the term “organization”: participants questioned how the term applied to group certificates and the intent of indicators in the group context relative to group members. This issue is particularly challenging regarding indicators associated with Principle 2 and Principle 4.
- Representative Sample Areas (RSA): there were divergent interpretations of the requirements, specifically whether RSAs are required to be established on each management unit. Additionally, participants were conflicted with regards to management requirements, details associated with successional stages of forests, and RSA and conservation area network (CAN) percentages as they applied to groups.
- Pesticide Use: participants expressed confusion with regards to conformance (including groups), with the terms “aim to eliminate,” “result in non-use or overall reductions,” and “exposure.”
- Cumulative burden on group entities: group managers expressed concern about the cumulative burden of expanded requirements in terms of documentation and monitoring on both group entities and group members.
- Auditability: participants had inconsistent perspectives with indicators that were lacking clear and defined scope, those that addressed the intent (as opposed to actions) of certificate holders or contractors, and those that included interim timelines for conformance.
- Applicability note function: participants questioned if applicability notes tied to base indicators also applied to family forest (FF), plantation (PL), or federal land (FL) indicators.
- References to an annex in indicator text: participants had inconsistent perspectives when annexes were directly referenced in an indicator.
- Reference to FSC US in indicator text (e.g., 3.3.1): this led to confusion regarding CH responsibility for conformance.
- Conservation Areas Network: participants had inconsistent perspectives regarding qualification of streamside management zones (SMZs), RSAs and other areas as well as management activities allowed within CAN areas.

FSC US Draft NFSS Simulated Field Test REPORT

Cambium Consulting conducted a series of nine simulated field tests, in the form of video interviews, with volunteer certificate holders (CH) and certification body (CB) representatives for selected elements of the Draft FSC US NFSS (v2.0). The primary purpose of the simulated field tests was to identify any “friction points” and “critical failures” in the draft standard.

This report includes an executive summary, including a high-level summary of results, as well as the main body of the report describing the methodology used to conduct simulated field tests and a comprehensive summary of key results. Annex 1 provides a table identifying the indicators evaluated during simulated field tests.

METHODOLOGY – NFSS FIELD TEST

Scope of Evaluation

FSC US identified a total of 106 indicators for evaluation representing a range of issues that are new to the standard and/or potentially challenging to users of the standard. The indicators identified for evaluation, as well as associated criteria, can be found in Annex 1. Four indicators associated with plantations (PL 6.6.5.2 – PL 6.6.5.5) were removed from the evaluation at the direction of FSC US because the requirements were materially unchanged from the existing FSC US NFSS. Additionally, one indicator (PL 6.6.2.1) was found not applicable to the scope of any participating certificate holders. Consequently, 101 indicators were included in the testing process. Four indicators were not evaluated in any of the tests as a result of the unpredictability associated with completing evaluation of scheduled indicators due to time constraints. In sum, evaluation of 97 of the indicators included in the scope of the simulated field tests resulted in 290 discreet sets of findings. On average, each testing session covered 32 indicators, with individual sessions ranging from 30 to 45 indicators. Individual indicators were evaluated in an average of 2.87 testing sessions, ranging from 0 to 7 times. See Annex 1 for a complete cataloging of indicators evaluated during simulated field tests.

Participants

Each field test included one or more representatives from the participating CH, a team of three CB representatives, and representatives from Cambium Consulting as facilitators. Additionally, members of FSC US Staff and SDG were invited to participate as observers.

The selected CHs represented a range of ownership types (e.g., size, intensity of management, ownership classification), certificate types (single, group), and FSC US geographic regions (e.g., PC, SE, NE, etc.). A total of nine simulated field tests were conducted, each focused exclusively on an individual certificate holder.

Auditors serving as CB representatives brought considerable FSC auditing experience and demonstrated a range of expertise typical of a full certification assessment team, i.e., social sciences, forestry, and forest/wildlife ecology. Collectively, auditors represented three of the four CBs active in FSC forest management certification in the US. In total, six of nine field tests were observed by one or more FSC US representatives including two members of the SDG, and the Director of Science and Certification.

Simulated Field Test Process

A sub-set of indicators were selected for each field test based on applicability to the scope of each participating CH's certificate, and with the intent of evaluating all indicators multiple times throughout the testing process. In advance of each testing session, participants were provided with the following materials:

- an overview of the FSC US NFSS testing process and preparation guide
- a summary of key changes to the NFSS (prepared by FSC US)
- a list of indicators selected for testing
- FSC US NFSS V2.0 D2.0 (current version of the draft revised standard)
- FSC Pesticide Policy (if applicable)
- FSC FM Group Standard (if applicable)

Simulated field tests were conducted remotely using an on-line video conferencing platform. Each session began with introductions from all participants, including a brief description of the size, scope, location and other relevant aspects of the certificate represented in the evaluation. Introductions were followed by a summary overview of the process. Each testing session was recorded with the consent of all participants.

All participants were instructed to familiarize themselves with the process as well as all relevant aspects of the standard to be evaluated including selected criteria, indicators, applicability and guidance, annexes, definitions and other relevant FSC standards. Participants were assumed to arrive at the testing sessions fully prepared.

The text of each indicator was displayed on a shared screen and read aloud to initiate the evaluation of each individual indicator. Certificate holders were then asked to provide their interpretation of the indicator requirements, a self-assessment of conformance (and anticipated changes required if not in conformance), and a description of evidence they would present to auditors in order to demonstrate conformance (actual evidence was not requested or provided). CB representatives then presented their perspectives noting any consistencies or inconsistencies with the interpretations of the CHs. Cambium Consulting then facilitated discussion regarding each indicator.

Potential "Critical Failures," "Friction Points" and challenges to auditability were noted from discussions as applicable for each indicator. Friction Points were identified where CHs and CBs had differing interpretations of the requirements stated by indicators or evidence that could be used or required to demonstrate conformance. This included consideration of related definitions, guidance, intent statements, applicability notes, and annexes in the draft standard as well as other related FSC documents (e.g., FSC group forest management certification standard, FSC Pesticide Policy).

Potential Critical Failures were identified as a potential inability of a CH to achieve conformance. Potential Critical Failures may be due to legal or liability constraints, logical constraints, technical issues, feasibility (including economic achievability), and other conditions that could function as barriers to conformance.

SUMMARY OF RESULTS – NFSS FIELD TEST

Many of the indicators were clear and had consistent interpretation among CHs and CBs. However, the standard testing process identified some persistent issues and potential friction related to the draft standard such as variable interpretations, confusion with terminology, and confusion with indicator themes such as RSAs.

The following is a high-level summary of areas we note as having friction points or potential critical failures.

General Issues

1. The overall complexity of the standard itself appears to impede understanding and potentially the ability to conform to the requirements. This is especially the case for smaller operations with limited resources available to invest in management of their certification. Most commonly, CHs expressed confusion about specific requirements for numerous elements of the standard; and difficulty tracking critical components of specific indicators (e.g., related definitions, guidance, applicability notes, annexes, etc.). None of the participants, including CB representatives, were fully 'up to speed' on all relevant elements of the standard. As such, the field tests served as discovery and calibration sessions for all participants. CB representatives developed increasingly stronger and more comprehensive understanding over time, yet differences in interpretation and confusion persisted on numerous issues throughout the testing process. Of course, this is reflective of the purpose of the tests, yet also indicative of challenges in comprehension that will persist over time. There is a clear need for a robust training effort directed at specific topics and tailored for different types of users.
2. Direct reference to an annex within an indicator occurs in numerous instances and has raised confusion regarding consistency of use and normative (i.e., obligatory) elements:
 - a. Referencing annexes within indicators is used inconsistently in the standard and is sometimes inconsistent within a single criterion. For example, Annex D is directly referenced in 1.6.4, but not in 1.6.1 – 1.6.3. Consequently, a CH could be found conformant with 1.6.1 – 1.6.3, but not conformant with 1.6.4 solely due to the reference of the annex in 1.6.4. It was noted that unlike Indicators 4.1.1 and 4.2.1, Annex F is not directly referenced within the text of Indicator 4.5.2. Other examples exist of annexes either included, or not included in the text of corresponding Indicators.
 - b. Including reference of annexes within indicators creates confusion about whether elements in the annex are required or whether they serve as guidance (e.g., providing examples and explanation). The description of annexes in the introductory section of the draft standard is confusing, noting that annexes are not normative, yet inferring CHs must conform with some aspects of an annex ("not required to conform to all aspects"). Some annexes (e.g., Annex D) include text specifically stating the content is intended as guidance. Directly referencing annexes in indicators leads to differences in interpretation about specific requirements. CB representatives have concluded that annexes would be used as a checklist when evaluating conformance when an annex is directly referenced in an indicator. Determining whether all elements of an annex or only selected elements of an annex should be viewed as normative remains unclear. Some annexes are quite extensive and explicit, others less so. CB representatives anticipate that ASI will consider the content of annexes referenced directly within indicators as mandatory.
3. Interpretation of the term "organization" has led to significant confusion about which parties to a certificate are included in the "organization" and the scope of requirements within numerous indicators. This issue was found to be particularly confusing when applied in the context of group certification within Principle 2 and Principle 4. Differences in interpretation exist between CHs and CB representatives, which can lead to potential critical failures in feasibility of conformance, friction points arising from differences in interpretation between CBs and CHs, and challenges in

auditability. Additional guidance from the FSC, and possibly edits to the standard to improve clarity, are needed. For example, how the term “organization” applies to group members.

4. Participants were frequently confused about the scope of applicability notes and other guidance for base indicators. For example, it is unclear if applicability notes for base indicators (i.e., displayed in black font) also apply to FF indicators. Occasionally, FF guidance or applicability notes may be embedded within base indicator guidance, resulting in difficulty in recognizing the guidance when interpreting FF indicators. Similarly, although not expressly stated, it appears that base indicator guidance is sometimes (though not always) intended to be applied to FF indicators, e.g., 2.2.1.
5. Ambiguity in indicator language i.e., use of subjective or confusing terminology, was a common issue for both CHs and CB representatives and led to challenges in interpretation and auditability. Additional guidance, including verifiers and examples in some cases, is recommended for numerous indicators. The closer the guidance is located to an indicator within the structure of the standard, the more useful it is to users.
6. Cumulative effects on group entities and FF group members resulting from additional requirements for documentation, increased requirements associated with numerous criteria, and demonstration of conformance for contractors are expected to result in diminished enrollment of members, increased difficulty in recruiting independent contractors, and increased costs for group entities.

Criterion 1.6 – Dispute Resolution

No significant issues were identified. Some broadly applicable comments were made that are addressed in the “General Issues” section above.

Principle 2 – Forest Workers

1. CHs are generally confident of their ability to demonstrate conformance for Principle 2 indicators as they apply within their own organizations.
2. A potential critical failure was raised by numerous CHs, including group entities, specifically regarding provision of verifiable evidence for independent contractors. Providing objective evidence for contractors, e.g., employment records is very problematic and unlikely to occur. CHs were unclear how they can meet the requirement and maintain an arm’s length relationship with independent contractors to meet US law. If a CH assumes too much responsibility of the contractor, the contractor could be considered an employee and liability assumed by the CH. If contract language and on-site observation is sufficient to demonstrate conformance, the indicator language (and/or elsewhere in the standard) should reflect a differentiation (in requirements) between CH employees and independent contractors, sub-contractors and their employees. If a complaint is made by a contractor employee, or an on-site observation suggests potential non-conformance, clarification is needed about corresponding actions required of the CH.
3. The term “sphere of influence” is used several times in various places in the standard but is not defined. Consider a more deliberate use and clearly defined applicability of “sphere of influence,” particularly in Principle 2. Consider adopting an approach similar to the Canada NFSS regarding sphere of influence. Evidence required to demonstrate conformance for indicators relating to contractors should be limited to insertion of contract language, contractor licenses, certification and on-site worker habits.

4. The definition for “independent contractor” does not differentiate between a service contract and a purchase agreement, perhaps intentionally. As a result, there is a lack of clarity about applicability of stumpage purchase agreements and timber deeds for all indicators addressing contractors or contracts. For example, these types of agreements do not typically include safety language, and CHs have no influence or involvement in hiring of logging contractors. If these agreements are subject to conformance to indicators addressing contractors and contracts, it could lead to a critical failure in feasibility of conformance.
5. Conformance for some indicators is more achievable for “significant” management activities, e.g., timber harvest than for other less disruptive activities such as mowing, minor roadwork or spot application of herbicides. Differentiating between these activities on the basis of risk, and then tailoring indicator requirements to risk level would be logical and could improve feasibility of conformance, particularly for FFs.
6. Both CH and CB representatives expressed concern over the lack of clarity on how to provide evidence of conformance regarding determination of a “living wage” within the forest industry. Ambiguity related to determination of a “living wage” has implications for feasibility of conformance and auditability. Complicating the issue is that wages can vary significantly by locality within the same industry. Similar concerns have been expressed regarding the requirement to contract with companies that “enhance” the “well-being” of contractor employees, which is seen as both ambiguous and subjective. Verifiers would be helpful.
7. Inconsistency of language used for the four indicators associated with Criterion 2.1 conveys very different levels of responsibility for the CH. Indicator 2.1.1 uses “does not use;” 2.1.2 “eliminates all forms of;” 2.1.3 “ensures that there is no;” 2.1.4 “respects.” If the difference in language is intentional, it’s not clear why. We suggest using consistent terminology, e.g., “does not.”
8. CHs and CB representatives are generally not familiar with the issue addressed in Indicator 2.6.4. Both CB representatives and CHs are unclear if the guidance is meant to indicate that if CHs are not aware of the existence of “work-arounds,” it is likely not an issue and can be considered ‘not applicable’ in the absence of complaints or other evidence provided. Alternatively, if the guidance is indicating CHs or CBs are responsible for determining states with high incidences of WC avoidance, it is generally perceived as onerous and unreasonable.

Principle 3 - Monitoring

1. There is a lack of clarity about how the reference to FSC US within Indicator 3.1.1 will function in practice. For example, is a list developed by FSC US definitive or is a CH required to supplement the FSC list with their own research? Language in the intent statement for 3.1.1 indicates that FSC US is largely accountable for conformance to this indicator, i.e., CHs are not responsible for potential gaps in identified tribes. How is conformance determined in the potential scenario where the FSC US list is not available, or perceived by one or more Native American groups to be incomplete or inaccurate?
2. State agencies may be limited by state law from recognizing certain tribes that could appear on a list developed by FSC. This would result in a conflict between adherence to legal requirements and conformance with FSC and represents a potential critical failure in feasibility of conformance.

3. There is a discrepancy between a CH and CB representatives in interpretation of Indicator 3.1.2 regarding whether the indicator requires only identification and documentation of rights, or if it also requires engagement with tribes regarding those rights?
4. There is a potential variation in interpretation about what is required of CHs when attempts are made to contact and discuss consent, but no response is received from tribes. For example, is lack of response equivalent to lack of consent? There is some concern about potential differences in interpretation of the term “culturally appropriate” between CHs and CBs that could lead to non-conformance.
5. The term “contested rights” is used in Indicator 3.1.2 but not 3.2.2. If a contested right is documented, then the CH conforms with the earlier indicator, but it is unclear how contested rights apply in 3.2.2. CB representatives stated they would issue a non-conformance if CHs were not engaged with tribes regarding contested rights as required in 3.2.2. However, public land management agencies may be legally prohibited from addressing contested rights. Consider addressing contested rights separately.
6. Questions were raised by CB representatives about applicability of all Criterion 3.2 indicators to tribal lands. Specifically, do Indicators 3.2.1 – 3.2.4 only apply to non-tribal lands where tribes hold rights, and does only 3.2.5 apply to tribal lands? How do these indicators, for example 3.2.3, apply to the potential scenario where multiple tribes have overlapping claims on lands assigned to one tribe? An FSC suggestion to include the word “only” in 3.1.5, as in “applies only to tribal lands” was well received by CB representatives.
7. One CH and CB representatives are unclear about applicability for tribal enterprises that are separate legal entities from the tribes and are assigned responsibility for management of tribal forests. This “gray area” has resulted in differences of interpretation among CB representatives, and uncertainty from one CH. Additional guidance from FSC is needed for applicability of Principle 3 indicators relative to this situation.

Criterion 4.5 – Impacts on Affected Communities

1. As with indicators associated with Principle 3, CHs expressed concern about how the term “culturally appropriate” will be interpreted and applied in the context of Indicator 4.5.1.
2. Indicator 4.5.1 appears to require CHs to have direct communication with local town officials. Engagement of local communities, e.g., through designated representatives, has typically not occurred. For some group certificates, and large and geographically dispersed land ownerships, e.g., state DNRs, conformance may be infeasible depending on interpretation regarding level and frequency of engagement required.
3. We noticed some conflation of “notification” with “engagement” that may create ongoing challenges for some CHs. A suggestion was made to consider making the requirement for “engagement” more aligned with the existing standard, i.e., a requirement for notification as opposed to engagement.
4. Some group entities were unclear about the types of impact to be addressed for FF lands.

5. Indicator 4.5.1 appears to require tribes to engage with local communities that are off the reservation, e.g., adjacent non-tribal communities or communities of other tribes. Further guidance from FSC is needed to clarify intent/applicability for tribes. FSC may also need to edit the definition of local communities in the context of tribal lands, if different from the requirement for all other land ownerships.
6. Regarding Indicator 4.5.2, there was a lack of clarity about whether the CH is required to develop strategies in collaboration with local communities, or if CHs are only required to engage communities to get information that can then be considered by the CH in the development of strategies. One CB representative interprets the indicator to require CHs to invite local communities to participate in development of strategies. Guidance from FSC is needed.

Criterion 5.3 - Externalities

No significant issues were identified. Some minor comments were made that can be attributed to a lack of familiarity with the criterion and its associated indicators.

Criterion 6.5 – RSA’s

1. We found significant variation in interpretation of requirements between CHs and CB representatives throughout the entire process. One CH concluded that RSAs could be designated off the MU, noting a preference for locating RSAs on the MU. One CH didn’t notice any change from the existing standard in terms of locating RSAs off the MU. Others interpreted the indicator to require RSAs must be located on the MU with narrow exceptions as noted in the annex. CB representatives interpret the indicator 6.5.2 to require designation of RSAs on the MU, but only if “viable” examples exist on the MU. If RSAs are required to be on the MU, it could be a “deal-breaker” for economic feasibility. For southeastern pine managers, changes to requirements for RSAs is the greatest concern within the standard revision. Note: Indicator 6.5.2 does not clearly reference the existence of viable examples of native ecosystem on the MU and does not specifically state RSAs must be established on the MU.
2. The FF Indicator 6.5.2 is missing the word “viable” which appears in the base Indicator 6.5.2. The absence of a reference to “viable” examples makes the FF indicator more demanding than the base indicator. Note the FF indicator also does not explicitly state that RSAs must be designated on the MU.
3. Group CHs commented that in general the terms RSA, CAN, and high conservation value (HCV) are confusing and there is a lack of clarity about how they differ from each other. CHs struggle to understand the concepts and how to explain them to group members. Training workshops and communication materials tailored for FFs are needed.
4. A literal reading of Indicator 6.5.2 could result in a different interpretation than a comprehensive reading of all related elements of the standard. This potential inconsistency in perceived intent is cause for concern. It’s viewed as critical to eliminate all potential contradictions in the standard and clarify intent regarding RSAs.
5. For group certificates it appears that in all references to CAN, the 10% minimum can be shared among all group member properties, but it is not clear if the same option exists for RSAs. Section 4 of the FM group standard (FSC STD 30 005) suggests that demonstration of conformance collectively across all group members is only applicable to CANs, and not specifically to RSAs. However, the FSC

IC interpretation regarding MUs less than 50 hectares in size is unclear on this issue. Auditors and CHs have had completely divergent perspectives. Explicit clarification in the guidance would be helpful.

6. Questions emerged about the applicability of seral stages in the context of identifying native ecosystems and requirements around designation of RSAs. Differences in interpretation exist among CB representatives about applicability to seral stages, i.e., whether all seral stages must be represented within designated RSAs. Or, if “viable” examples of certain seral stages are not present on the MU, the CH is not required to designate or restore sample areas of those seral stages. Note: the definition of ecosystem in the glossary states that terrestrial ecosystems “are intended to encompass common successional pathways for a given landscape setting,” which suggests that RSAs should include all seral stages represented in the landscape that would typically occur on the MU. Clarification on this issue would be very helpful.
7. Use of the word “protected” in 6.5.2 can be interpreted to mean ‘off-limits’ to management and thus may conflict with other indicators (e.g., protected areas). There is confusion among CB representatives about intent resulting from use of the word “protected” as contrasted with management in accordance with established goals for an RSA.
8. Questions surfaced about how to apply Indicator 6.5.2 to timber deeds purchased by the organization wherein the deed itself has scoped out conservation areas (not the result of the organizations actions). Annex G is not clear on the situation where previous landowners, and not “the organization,” intentionally scoped out conservation areas. This issue remains unresolved.
9. Questions were raised about whether a CH could be exempt from the requirement to restore natural ecosystems as RSAs if there are purported to be legal reasons preventing an organization from maintaining a particular ecosystem. An example may be fire-maintained systems. One CH questioned whether they will need to have RSA established for older seral stages, stating that they don’t have capacity to burn at a frequency needed to maintain older longleaf pine. They assert they are unable to burn due to liability and financial constraints. See the list of exceptions to the requirement for restoring RSAs in Annex G, pp. 189-190.
10. Indicator 6.5.3 is long and convoluted making it difficult to understand. Additionally, the indicator infers that native ecosystems which are adequately protected in the landscape (i.e., not ‘inadequately protected’) can ‘count’ as RSAs. As such, this indicator is perceived to be out of alignment with other areas of the standard, e.g., Annex G, which seem to indicate RSAs must be established on the MU.
11. Regarding Indicator 6.5.3, the terms “inadequately represented” in the landscape, “degraded condition” and “could be restored” are vague, difficult to interpret, and subject to a high degree of auditor discretion. This creates challenges for consistent auditing. There is confusion about whether a “degraded” ecosystem and a “viable” ecosystem are considered mutually exclusive.
12. There is a general lack of clarity about how many acres are required to be designated or restored as RSAs. Both CHs and CB representatives expressed confusion with Indicator 6.5.4 due to ambiguous language. The use of qualitative language makes it difficult to understand how much is enough, leading to challenges in auditability. There is broad confusion about what is meant by “proportionate to the conservation status and value,” and “proportionate to the size of the

management unit.” A CH could arrive at a reasonable conclusion that a CB doesn’t agree with. The amount of RSA established should also consider the amount of corresponding native ecosystem that occurs within the MU. Additional guidance is needed to clarify acceptable levels of designated RSA.

13. There is some confusion about the timeframe for completing the review of designated RSAs as required in Indicator 6.5.6. The statement that “designation of RSAs is reviewed as part of the review of the management plan” appears to suggest that for existing CHs, the process of revisiting RSA designations (6.5.1 – 6.5.4) does not need to be completed until the next scheduled forest management plan (FMP) review. Differences of opinion exist in how to interpret the requirement. Similarly, questions exist as to whether changes to FMPs (i.e., regarding RSA designations) can be made at the time of the scheduled plan revision, e.g., at least every ten years. Guidance is needed regarding the transition period to new requirements in the standard and perhaps development of interim indicators if needed.
14. Indicator 6.5.7 will likely result in a potential fatal flaw for feasibility of conformance if the CH is required to set aside productive timber land as protected areas to meet the 10% threshold. Conformance could be a significant challenge to meet for owners of highly productive pine stands and for some group certificates. That said, most CHs expected they could meet the requirements of the indicator.

Plantation (PL) Indicators

1. There exists a lack of clarity among CHs and CB representatives about whether PL 6.6.1.1 applies to a “plantation” site that has been harvested and then re-established as a plantation or if it applies only where new plantations are established on sites that were not previously occupied by a plantation (e.g., grassland or degraded forest being converted to plantation). Additionally, PL 6.6.1.1 appears to largely overlap with Criterion 6.9, except for the broader reference to “any existing natural ecosystem.” Clarification on both these issues would be helpful.
2. There remains a lack of clarity about whether a CH needs to prioritize restoration for areas of greatest gain if the MU has >15% maintained as (not restored to) semi-natural yet they also have some restoration activities (that are not required to reach 15% of the MU). It appears not, but it’s not entirely clear. One CB representative suggested that, as written, ASI would require a landscape analysis.
3. As written, PL 6.6.2.2 is a long and convoluted indicator which makes it difficult to understand. The phrase “especially through habitat management” is confusing. There is a lack of clarity about intent and how to audit that element of the indicator. The specific reference to “15%” in the indicator is awkward since the area of the MU in a natural/semi-natural condition is unlikely to be exactly 15% and may be 90% or more of the MU. Consider moving this last part of the indicator to guidance and further clarifying intent. Or delete it entirely. It is also unclear if PL 6.6.2.2 is applicable in cases where only a small portion of the MU is managed as plantation.
4. Regarding base Indicator 6.10.2, although these terms are not new, CB representatives and CHs are unclear about how to interpret the requirement relating to conservation benefit. It may be beneficial to provide some guidance on interpretation of “clear, substantial, additional, secure, *long-term* conservation** benefits.” Providing examples would help given the uncommon applicability of the indicator in the US.

5. The text of Indicator 6.10.2 is long and may be challenging to accurately interpret, for example in the case of Seven Islands, where some conversions of natural forest to plantations have been implemented for increased production.
6. It's unclear why there is a link back to 6.10.2 (b) in the text of Indicator 6.10.3. This reference seems entirely redundant. Assuming the intent is to clarify that, for plantations converted after 1994 for which the CH is not responsible, a "very limited portion" of those plantations does not have to be restored, a suggestion was made to revise the indicator language to make that distinction clear and/or move it to guidance.

Criterion 7.2 – Climate Change Impacts

1. Expectations are not clear for auditing during the interim period between standard approval and the end of the transition period for updating FMPs. Additional guidance or possibly interim indicators would be helpful.
2. The CB representatives' interpretation is that all elements listed in 6.1.1 (6.1.1.a – i) must be addressed for 7.2.4 (and FF 7.2.1.i) since 6.1.1 is directly referenced in the indicator language. One CH expressed frustration about this interpretation and concluded non-conformance on that basis.

Climate change is also impacting cultural resources, i.e., wild rice, ash trees used for baskets. Indicator 6.1.1 does not explicitly address cultural values.

3. SFI CHs expressed frustration that the document required to meet the SFI climate smart forestry objective would not (in their view) be sufficient to meet 7.2.4 requirements.
4. A group CH interprets the standard to mean existing FMPs do not need to be revised to account for potential impacts of climate change until the next scheduled plan revision. Alternatively, CB representatives interpret the requirement that FMPs for each MU must be completed within 5 years. It could be a significant challenge for group CHs, if not impossible for very large groups, to complete within the allotted time period of 5 years.
5. Some group CHs are frustrated about the requirement to include consideration of climate change impact in management plans. Many group members have not seen impacts from climate change on their forest lands. CHs were unclear about what would need to be addressed for FFs; asserting that sustainable forest management alone meets the requirement. This was seen as another example of increased costs that will not impact management on the ground and will not add value to the certification.
6. A group CH suggested that providing an option for development of an interim group-wide solution, e.g., an annex to all FMPs with generic guidelines and resources to bridge existing plans to the next scheduled plan revision. The generic guidance could, for example, include strong encouragement to incorporate consideration for impacts of climate change into planning for significant activities like timber harvest or regeneration. For FFs without planned activities during the current FMP period, requiring plan amendments for climate change impacts is not reasonable.
7. The time period to be considered for evaluating climate change impacts is not clear, e.g., 10 years, rotation length, or management planning period. Guidance for how to determine a timeline for consideration of impacts would be helpful.

Principle 8 - Monitoring

1. At least one CH is unclear about what to monitor, how to monitor and when to monitor impacts of climate change. The period for monitoring is not specified in the indicator or in guidance.
2. Annex J is referenced directly in Indicator 8.2.1 (and FF 8.2.1), stating that monitoring protocols must “align” with the annex. “Align” is interpreted by CB representatives to mean “follow.” Auditors note they will use Annex J as a checklist. Yet the annex itself explicitly states it is not required in any indicator. As with other indicators that include direct reference to an annex, this apparent conflict with Annex J is a source of confusion to CB representatives. Both the guidance and the annex also refer to “other elements” of the annex that are not explicitly required, however it isn’t clear which “elements” are required, and which are not.
3. Regarding FF 8.2.1, it’s unclear if all elements in Annex J are applicable to FF conditions. Rather than leaving it to CHs and auditors to go back through the entire standard to identify “aspects of management activities that are associated with indicators that have low risk designations,” it would be helpful to specifically identify applicable management activities either in the guidance or the annex. Currently there is not specific accommodation for FFs in the annex beyond brief reference to size, intensity and risk (SIR). Monitoring of social impacts is viewed by some group CHs as challenging, bureaucratic and unnecessary for management of FF lands. Social impacts for small, low intensity and low frequency MUs are difficult to monitor and document and are currently not included in monitoring for FFs.
4. Social values may include cultural values (as distinguished from cultural sites), for example, impacts from emerald ash borer (EAB) to ash trees used for Native American basket making.
5. There are two distinct scenarios addressed in Indicator 8.2.3 which may have led to some confusion about applicability in the context of ‘holding rights’ versus ‘having interest.’ There is also some confusion among CHs (going back to associated indicators in Principle 3) about whether ‘notification’ is sufficient for ‘engagement’. Further questions surfaced about whether lack of response from tribes is equivalent to lack of interest, and how to demonstrate that methods of communication are culturally appropriate.
6. Indicator FF 8.4.1 could be challenging to audit. Guidance states that a summary of monitoring and evaluation results doesn’t have to be written. Therefore, the only means of verification is interviews. If auditors find differing testimonies, CBs could be challenged to verify conformance. That said, the advantage of streamlined conformance for FFs is acknowledged and appreciated.
7. There are open questions about how to demonstrate conformance to Indicator 8.5.1 for group certificates when material may be sold from group member properties to non-certified mills. Does material harvested from FSC-certified MUs inherently lose its FSC claim when sold to non-certified mills, and in that case is not applicable to 8.5.1? More clarification is required in guidance.
8. In the case of groups, group members may have to manage the records or agree to obtain records if requested for material sold to non-certified purchasers.

Criterion 9.1 – HCV Assessment

1. CB representatives have assumed that all CHs will need to redo their HCV assessment. This may be an inherent bias of CBs. Multiple CHs did not see any material difference with the current standard requirement.
2. Similar to 7.2.4, there is a lack of clarity about auditing requirements in the interim period between standard approval and the end of the ‘grace period’ for conforming to the indicator. A suggestion was made to develop interim indicators or provide additional guidance.
3. A recurring theme of inclusion of reference to an annex within an indicator led to some disagreement among CB representatives regarding interpretation of indicator requirements and how to evaluate conformance. On the one hand, the direct reference (“consistent with”) clarifies expectations for content of the HCV assessment. On the other hand, with the annex included in the indicator, ASI will expect every applicable element of the annex to be addressed, i.e., CBs will use the annex like a checklist for conformance. Either make the annex normative or provide additional clarity in the indicator.
4. Auditors would use the FF section of Annex K as a checklist to verify the HCV assessment process is completed for each MU in the group. At least one group manager found the Annex K guidance to be onerous for FFs.
5. It’s unclear if for groups every MU must have its own independent HCV assessment or if a group entity can implement a group level assessment, for example at a landscape scale as long as all group MUs are located within the landscape analyzed. Guidance may be helpful to clarify if a centralized, landscape level approach is appropriate for groups.
6. Note: some groups may (likely do) have considerable variability among group members in understanding, assessment and resulting designation of HCVs and would benefit from a centrally managed process. The same is probably true for RSAs and CANs.
7. As with plan revisions required for climate change impacts, it is viewed as unreasonable to require plan revisions for changes in HCV designations solely in response to changes in the standard prior to the scheduled plan update.

Criterion 10.7 – Pesticide Use

1. Some CHs expressed the sentiment that the need for use of pesticides in sustainable forestry is not going away with ongoing increases in invasive species. The stated mandate to reduce or eliminate use is not reasonable or practical.
2. There is a common lack of clarity among group CHs and CB representatives about whether Indicator 10.7.1 is intended to apply on a tract by tract basis for group certificates, especially when considering the last sentence in the indicator, assuming documentation is required for chemical use on every tract. If groups are required to demonstrate elimination or reduction of pesticides on each group MU, they will have a problem with conformance.
3. For groups whose enrollment is constantly changing, e.g., expanding, demonstration of reduced use of chemicals is not feasible. Furthermore, activity levels vary from year to year resulting in corresponding changes (up or down) in use of chemicals.

4. There do not appear to be any concessions for changing environmental conditions such as insect infestations or new invasive species. Are there scenarios that would make increase in pesticide use acceptable? More flexibility and guidance are needed.
5. For group certificates, there is shared frustration with the statement “aim to eliminate” which is not viewed as realistic or even beneficial in the context of some forest management. The stated goal to “eliminate” use of pesticides is very difficult to sell to landowners. For one group CH, while all group members aim to minimize pesticide use, reduction or elimination of pesticide use is not a management objective for any group members.
6. CB representatives noted that with the direct reference within Indicator 10.7.2 to clause 4.12 in the FSC Pesticide Policy, they would verify that all elements of the clause are addressed. It would be helpful if the elements of Pesticide Policy clause 4.12 were embedded either in the indicator or in the guidance.
7. One group entity expressed frustration that Indicator 10.7.2 is only creating a lot of paperwork for FF group members and the group entity, and not having any impact on management activities. They follow the label; that should be enough.
8. Item a) in Indicator 10.7.3 should clarify if the requirement is intended to compare the selected pesticide only with other pesticides or with all potential treatment options.
9. There is redundancy between Indicators 10.7.2 and 10.7.3. The ESRA framework referenced in 10.7.2 includes 13 requirements and some of those requirements are addressed again in 10.7.3.a, resulting in the same issues being audited twice. CB representatives suggest removing redundancy in 10.7.3.
10. It’s unclear to CH and CB representatives if Indicator 10.7.3 applies at the tract level, e.g., group member MU, or if the indicator can be met with an overarching approach for group certificates. Item #6 in Pesticide Policy clause 4.12 indicates tract level applicability, but the context is not clearly stated in the indicator.
11. A CH expressed concern about how “objective evidence” in Indicator 10.7.3.b would be interpreted, i.e., is explaining their thought process sufficient? Other CH noted the existence of “numerous scientific studies” as sufficient objective evidence. FSC’s suggestion to state “best available information” instead of “objective evidence” was well received. There is no requirement within Indicator 10.7.3 for documentation, however CB representatives suggested they would look for documented evidence to “demonstrate” the process used.
12. It’s unclear to both CHs and CB representatives whether Indicator 10.7.4 requires only records of pesticide use or is requiring an activity plan. Clarification would be helpful. It is also unclear how a plan, which by definition is created prior to an activity, could include records of pesticide use occurring after the plan is created. A suggestion was made to revise the indicator to address only records that document pesticide use since written plans are already required by 10.11.1. and to address plans here is redundant.

13. Although Indicator 10.11.1 is not specifically included in the simulated field tests, concern was expressed by CHs because the indicator is unclear about whether site specific documentation is required. The intent statement is also not clear, on the one hand suggesting the intent is to provide more site-specific planning than provided in a more general plan, and on the other stating that plans can address multiple sites with similar activities (no mention of similarity of site conditions). CHs also expressed concern about whether the indicator requires written plans to include everything addressed in the indicator at tract level, and where the line is drawn on defining “significant” activities, e.g., site prep, fertilizing, pre-commercial thinning, etc.
14. Records of accidents and injuries are maintained for CH employees, but not for contract workers. CHs can’t get that information from contractors and can’t put such a requirement in contracts. CHs do not monitor or record incidents of contractor worker exposure. Instead, they rely on contractors to monitor and avoid pesticide exposure for their workers. Significant concern was expressed by CHs about access to records of contractor employees, and the apparent requirement in Indicator 10.7.5 for the CH to keep records of contractor employee exposures. As written, Indicator 10.7.5 represents a potential critical failure for several CHs.
15. Conformance to Indicator 10.7.5 is further complicated for group certificates where group members are responsible for issuing contracts for pesticide application. Neither the group entity nor group members collect reports of chemical exposure among contractors. The group entity also doesn’t ask group members to report incidents of exposure. Group members may be reluctant to report spills or exposures.
16. There is some question about the value of Indicator 10.7.5 when trained and licensed applicators are used and required by contract. It’s also unclear if, when professional licensed applicators are used, they will report any “exposure” to the landowner. This is especially concerning in the cases of FFs but for other CHs as well.
17. CB representatives express concern about the auditability of Indicator 10.7.5 given the requirement for a CH to monitor incidents of exposure for employees of independent contractors, yet CHs don’t have access to those records.

Annex 1: Table of Indicators Tested

Criterion	Indicator Number	Total Tests
C1.6 <i>The Organization*</i> shall identify, prevent and resolve <i>disputes*</i> over issues of statutory or <i>customary law*</i> , which can be settled out of court in a timely manner, through <i>engagement*</i> with <i>affected stakeholders*</i> .	1.6.1	4
	1.6.2	2
	FF 1.6.2	3
	1.6.3	2
	FF 1.6.3	3
	1.6.4	2
C2.1 <i>The Organization*</i> shall <i>uphold*</i> the principles and rights at work as defined in the ILO <i>Declaration on Fundamental Principles and Rights at Work*</i> (1998) based on the eight <i>ILO Core*</i> Labor Conventions.	2.1.1	2
	2.1.2	2
	2.1.3	3
	2.1.4	2
C2.2 <i>The Organization*</i> shall promote gender equality in employment practices, training opportunities, awarding of contracts, processes of <i>engagement*</i> , and management activities.	2.2.1	4
	FF 2.2.1	3
	2.2.2	3
	2.2.3	4
	2.2.4	3
	2.2.5	3
C2.3 <i>The Organization*</i> shall implement health and safety practices to protect <i>workers*</i> from occupational safety and health hazards. These practices shall, proportionate to <i>scale, intensity, and risk*</i> of <i>management activities*</i> , meet or exceed the recommendations of the ILO Code of Practice on Safety and Health in Forestry Work.	2.3.1	3
	2.3.2	4
	FF 2.3.2	3
	2.3.3	7
	2.3.4	7
	2.3.5	7
C2.4 <i>The Organization*</i> shall pay wages that meet or exceed minimum <i>forest*</i> industry standards or other recognized <i>forest*</i> industry wage agreements or <i>living wages*</i> , where these are higher than the <i>legal*</i> minimum wages. When none of these exist, <i>The Organization*</i> shall, through <i>engagement*</i> with <i>workers*</i> , develop mechanisms for determining <i>living wages*</i> .	2.4.1	3
	2.4.2	3
	2.4.3	3
	2.4.4	3
	2.4.5	2
	C2.5 <i>The Organization*</i> shall demonstrate that <i>workers*</i> have job-specific training and supervision to safely and effectively implement the <i>management plan*</i> and all <i>management activities*</i> .	2.5.1
FF 2.5.1		3
2.5.2		6
C2.6 <i>The Organization*</i> , through <i>engagement*</i> with <i>workers*</i> , shall have mechanisms for resolving grievances and for providing <i>fair compensation*</i> to <i>workers*</i> for loss or damage to property, <i>occupational diseases*</i> , or <i>occupational injuries*</i> sustained while working for <i>The Organization*</i> .	2.6.1	5
	2.6.2	5
	2.6.3	5
	2.6.4	5
C3.1 <i>The Organization*</i> shall identify the <i>Indigenous Peoples*</i> that exist within the <i>Management Unit*</i> or those that are affected by <i>management activities*</i> . <i>The Organization*</i> shall then, through <i>engagement*</i> with these	3.1.1	2
	3.1.2	2
	FF 3.1.2	1

Criterion	Indicator Number	Total Tests
<i>Indigenous Peoples*</i> , identify their <i>rights* of tenure*</i> , their <i>rights*</i> of access to and use of <i>forest*</i> resources and <i>ecosystem services*</i> , their <i>customary rights*</i> , and <i>legal*</i> rights and obligations that apply within the <i>Management Unit*</i> . <i>The Organization*</i> shall also identify areas where these <i>rights*</i> are contested.		
C3.2 <i>The Organization*</i> shall recognize and <i>uphold*</i> the <i>legal*</i> and <i>customary rights*</i> of <i>Indigenous Peoples*</i> to maintain control over <i>management activities*</i> within or related to the <i>Management Unit*</i> to the extent necessary to protect their <i>rights*</i> , resources, and <i>lands and territories*</i> . Delegation by <i>Indigenous Peoples*</i> of control over <i>management activities*</i> to third parties requires <i>Free, Prior, and Informed Consent*</i> .	3.2.1	1
	3.2.2	2
	3.2.3	3
	3.2.4	1
	3.2.5	1
C3.3 In the event of delegation of control over <i>management activities*</i> , a <i>binding agreement*</i> between <i>The Organization*</i> and the <i>Indigenous Peoples*</i> shall be concluded through <i>Free, Prior, and Informed Consent*</i> . The agreement shall define its duration, provisions for renegotiation, renewal, termination, economic conditions, and other terms and conditions. The agreement shall make provision for monitoring by <i>Indigenous Peoples*</i> of <i>The Organization*</i> 's compliance with its terms and conditions.	3.3.1	2
	3.3.2	1
C3.5 <i>The Organization*</i> , through <i>engagement*</i> with <i>Indigenous Peoples*</i> , shall identify sites which are of special cultural, ecological, economic, religious, or spiritual significance and for which these <i>Indigenous Peoples*</i> hold <i>legal*</i> or <i>customary rights*</i> . These sites shall be recognized by <i>The Organization*</i> and their management, and/or <i>protection*</i> shall be agreed through <i>engagement*</i> with these <i>Indigenous Peoples*</i> .	3.5.1	1
	FF3.5.1	0
	3.5.2	1
	FF 3.5.2	0
C3.6 <i>The Organization*</i> shall <i>uphold*</i> the right of <i>Indigenous Peoples*</i> to <i>protect*</i> and utilize their traditional <i>knowledge*</i> and shall compensate <i>local communities*</i> for the utilization of such knowledge and their <i>intellectual property*</i> . A <i>binding agreement*</i> as per Criterion 3.3 shall be concluded between <i>The Organization*</i> and the <i>Indigenous Peoples*</i> for such utilization through <i>Free, Prior, and Informed Consent*</i> before utilization takes place, and shall be consistent with the <i>protection*</i> of <i>intellectual property*</i> rights.	3.6.1	1
	3.6.2	1
C4.5 <i>The Organization*</i> , through <i>engagement*</i> with <i>local communities*</i> , shall take action to identify, avoid, and mitigate significant negative social, environmental, and economic impacts of its management activities on affected communities. The action taken shall be proportionate to the <i>scale, intensity, and risk*</i> of those activities and negative impacts.	4.5.1	5
	FF 4.5.1	3
	4.5.2	5
C5.3 <i>The Organization*</i> shall demonstrate that the positive and negative <i>externalities*</i> of operations are included in the <i>management plan*</i> .	5.3.1	3
	5.3.2	3
C6.5 <i>The Organization*</i> shall identify and protect <i>Representative Sample Areas*</i> of native <i>ecosystems*</i> and/or <i>restore*</i> them to more <i>natural conditions*</i> . Where <i>Representative Sample Areas*</i> do not exist or are	6.5.1	6
	6.5.2	3
	FF 6.5.2	3

Criterion	Indicator Number	Total Tests
insufficient, <i>The Organization*</i> shall <i>restore*</i> a proportion of the <i>Management Unit*</i> to more <i>natural conditions*</i> . The size of the areas and the measures taken for their <i>protection*</i> or <i>restoration*</i> , including within <i>plantations*</i> , shall be proportionate to the <i>conservation*</i> status and value of the <i>ecosystems*</i> at the <i>landscape*</i> level, and the <i>scale*</i> , <i>intensity*</i> , and <i>risk*</i> of <i>management activities*</i> .	6.5.3	3
	6.5.4	3
	6.5.5	6
	6.5.6	6
	6.5.7	5
	6.5.8	0
C6.6 <i>The Organization*</i> shall effectively maintain the continued existence of naturally occurring <i>native species*</i> and <i>genotypes*</i> , and prevent losses of <i>biological diversity*</i> , especially through <i>habitat*</i> management in the <i>Management Unit*</i> . <i>The Organization*</i> shall demonstrate that effective measures are in place to manage and control hunting, fishing, trapping, and collecting.	PL 6.6.1.1	2
	PL 6.6.1.2	2
	PL 6.6.1.3	2
	PL 6.6.2.1	0
	PL 6.6.2.2	2
	PL 6.6.3	2
	PL 6.6.5.1	1
	PL 6.6.5.2	0
	PL 6.6.5.3	0
	PL 6.6.5.4	0
PL 6.6.5.5	0	
C6.8 <i>The Organization*</i> shall manage the <i>landscape*</i> in the <i>Management Unit*</i> to maintain and/or <i>restore*</i> a varying mosaic of species, sizes, ages, <i>spatial scales*</i> , and regeneration cycles appropriate for the <i>landscape values*</i> in that region, and for enhancing environmental and economic <i>resilience*</i> .	PL 6.8.1	2
C6.10 <i>Management Units*</i> containing <i>plantations*</i> that were established on areas converted from <i>natural forest*</i> after November 1994 shall not qualify for certification, except where: a) clear and sufficient evidence is provided that <i>The Organization*</i> was not directly or indirectly responsible for the <i>conversion*</i> ; or b) the <i>conversion*</i> affected a <i>very limited portion*</i> of the area of the <i>Management Unit*</i> and is producing clear, substantial, additional, secure long-term <i>conservation*</i> benefits in the <i>Management Unit*</i> .	6.10.1	2
	6.10.2	2
	6.10.3	2
C7.2 <i>The Organization*</i> shall have and implement a <i>management plan*</i> for the <i>Management Unit*</i> which is fully consistent with the policies and <i>management objectives*</i> as established according to Criterion 7.1. The <i>management plan*</i> shall describe the natural resources that exist in the <i>Management Unit*</i> and explain how the plan will meet the FSC certification requirements. The <i>management plan*</i> shall cover <i>forest*</i> management planning and social management planning proportionate to <i>scale*</i> , <i>intensity*</i> , and <i>risk*</i> of the planned activities.	FF 7.2.1.i	3
	7.2.4	4
C8.1 <i>The Organization*</i> shall <i>monitor*</i> the implementation of its <i>management plan*</i> , including its policies and <i>management objectives*</i> , its	8.1.1	3
	FF 8.1.1	3
	8.1.2	3

Criterion	Indicator Number	Total Tests
progress with the activities planned, and the achievement of its <i>verifiable targets</i> .*		
C8.2 <i>The Organization</i> * shall <i>monitor</i> * and evaluate the environmental and social impacts of the activities carried out in the <i>Management Unit</i> *, and changes in its environmental condition.	8.2.1	2
	FF 8.2.1	3
	8.2.2	2
	8.2.3	1
	FF 8.2.3	3
C8.3 <i>The Organization</i> * shall analyze the results of monitoring and evaluation and feed the outcomes of this analysis back into the planning process.	8.3.1	1
	FF 8.3.1	2
	8.3.2	0
	FF 8.3.2	2
C8.4 <i>The Organization</i> * shall make <i>publicly available</i> * a summary of the results of monitoring free of charge, excluding <i>confidential information</i> *.	8.4.1	2
	FF 8.4.1	2
C8.5 <i>The Organization</i> * shall have and implement a tracking and tracing system proportionate to <i>scale</i> *, <i>intensity</i> *, and <i>risk</i> * of its <i>management activities</i> *, for demonstrating the source and volume in proportion to projected output for each year, of all products from the <i>Management Unit</i> * that are marketed as FSC certified.	8.5.1	3
	8.5.2	3
	8.5.3	2
	FF 8.5.3	2
9.1 <i>The Organization</i> *, through <i>engagement</i> * with <i>affected stakeholders</i> *, <i>interested stakeholders</i> *, and other means and sources, shall assess and record the presence and status of the following <i>High Conservation Values</i> * in the <i>Management Unit</i> *, proportionate to the <i>scale</i> *, <i>intensity</i> *, and <i>risk</i> * of impacts of <i>management activities</i> *, and likelihood of the occurrence of the <i>High Conservation Values</i> *.	9.1.1	5
C10.7 <i>The Organization</i> * shall use <i>integrated pest management</i> * and <i>silviculture</i> * systems which avoid, or aim at eliminating, the use of chemical <i>pesticides</i> *. <i>The Organization</i> * shall not use any chemical <i>pesticides</i> * prohibited by FSC policy. When <i>pesticides</i> * are used, <i>The Organization</i> * shall prevent, mitigate, and/or repair damage to <i>environmental values</i> * and human health.	10.7.1	5
	10.7.2	4
	10.7.3	4
	10.7.4	4
	10.7.5	4
	10.7.6	3
TOTAL		290