



Forest Stewardship Council®



Report of the second Public Consultation on the New National FSC® Forest Management Standards

January 2021



Introduction

FSC® was created in 1993 in response to concerns about global deforestation and the fate of the world's forests. At the time, deforestation in the Amazon and other rainforests attracted a lot of international media attention. The concept of certification emerged as a way to control forest production practices, through the valuation, in the market, of products originating from responsible forest management. A group formed by companies and social and environmental organizations from around the world started negotiations for the creation of an independent entity that established universal principles to guarantee good forest management. Since then, the FSC has become the forest certification system with the greatest international credibility and the only one that equally incorporates the interests of social, environmental and economic groups (Linha do Tempo, FSC, 2012).

The entity is constituted with a unique governance structure, built on the principles of democracy, participation and equality. FSC Brazil is a civil association, governed by its members, who can be individuals (individuals) or organizations (legal entities). The membership is diverse, including environmental and social NGOs, timber traders, forest organizations, indigenous peoples' organizations, small producers, community groups, manufacturers and retailers, forest certification organizations, forest owners, among others. In this sense, all members support and commit to applying the FSC set of Principles and Criteria (P&C).

The members of the Brazilian Forest Stewardship Council are subdivided into three chambers: Environmental, Social and Economic. The Environmental Chamber is represented by non-profit institutions, NGOs, Research Institutes and citizens with an interest in the environmentally correct forest management of native and planted forests. The Economic Chamber brings together companies and organizations with commercial interest, represented by industries, traders, wholesalers, retailers and consumers and the Social Chamber, formed by non-profit organizations, NGOs, community associations and entities representing Indigenous Peoples and Quilombolas. Under this configuration, each member is part of one of the three chambers, with each chamber holding 33.3% of the vote, thus ensuring equity between different interest groups and levels of economic power.

In terms of decision-making, FSC Brazil's decisions are deliberated by the vote of the majority of the members of the social, environmental and economic chambers, in annual meetings or meetings of the directive bodies of the Direct Council, Fiscal Council, Conflict Resolution Committee and Committee Development Standards (CDP), whose representatives are elected by all FSC members for 3-year terms, representing their chambers. Additional information about FSC Brazil and other information can be obtained from the website: br.fsc.org/pt-br.



I – Introduction

Currently, there are 3 FSC forest management standards in force in Brazil: Harmonized Plantations (FSC-STD-BRA-01-2014 V1-1 PT): standard derived from the interim standards of accredited certifiers in Brazil and used to assess the management of forest plantations; Terra Firme (FSC-STD-BRA-01-2001 V1-1 PT): standard designed for the certification of terra firme Amazonian forest management in Brazilian territory in accordance with the procedures recommended by the FSC and SLIMF (FSC-STD-BRA -03-2013 V3-2 PT): standard for assessing small-scale and/or low-intensity forest management, mainly used for smallholders or community production. Each standard specifies the requirements that must be met by organizations that wish to certify their forest management areas.

In 2015, Brazil started the process of reviewing these standards, according to the FSC International review flow, with the approval of the new FSC Principles and Criteria (v5, 2012) and the International Generic Indicators (IGIs) in 2015. It was from that moment on that the revision of the Brazilian FSC standards began. For the process of reviewing national standards, FSC Brazil conducted from 15 May to 15 July 2016 a first round of Public Consultation on version 1 of the Plantation Management Standard, prepared by the Standards Development Committee (CDP). The CDP together with the Committee of Technical Experts (CET) decided to carry out two field tests, aiming to assess the possibility of implementing and auditing the standard, one test in a business management unit and another in small producer management (SLIMF).

Field tests were carried out from November 6 to 10, 2017 in a company with approximately 231 thousand ha of total certified area and on November 20, 2017 in a group of 107 small producers with a total area of approximately 15 thousand there is. Based on the results of the two field test reports, a version 3 of the standard for evaluating the management of forest plantations in Brazil was prepared and approved by the CDP on 06/26/2018. The document presented here constitutes a general analysis of all contributions received as a result of the Public Consultation, with emphasis on the main points and most relevant comments issued by the participants.

II – Public Consultation Process

The Public Consultation was held from September 5 to November 4, 2018 (60 days), with the aim of presenting to interested and affected parties the standard for evaluating the management of forest plantations in Brazil" (version 3), composing the presentation of the 10 Principles, 70 Criteria and 323 Indicators. This standard applies to organizations that wish to have their plantation management certified by the FSC in Brazil, including the management of non-timber forest products.

The process was conducted through the FSC Brazil website (<https://br.fsc.org/pt-br/consultas/consultas-fsc-brasil>), covered by an interactive online platform, developed specifically for this process. The platform was structured to capture personal information from participants and to assess the 323 Indicators. Each indicator can be evaluated, according to the following options:



<input type="checkbox"/>	I agree	<input type="checkbox"/>	I want to modify	<input type="checkbox"/>	I want to delete
Comment/Justification:					

At the end of the process, all comments received from participants were previously compiled and organized (verification of participant duplicity and consolidation of similar comments) for the CDP meetings. With this in mind, at the CDP meetings, the document served as the basis for analysis and, when considered pertinent and applicable, the comment was incorporated into the review of that indicator.

II – General statistics on contributions received

The result of the second Public Consultation on the new “FSC® National Standard for Assessment of Plantation Management in Brazil” counted the participation of 41 people from different entities. Most contributions were made by companies in the forestry sector, namely: Adami, Arauco do Brasil, Cenibra (Celulose Nipo-Brasileira), CMPC Celulose Riograndense, Eldorado Brasil, Faber-Castell, FRP Florestal (Forestry Rio Marombas), International Paper, Klabin, Remasa Reflorestadora, Suzano Papel e Celulose, TTG Brasil, Veracel and WestRock (most belonging to the economic chamber). The social chamber participated with only one member (union), no environmental chamber participant and only one individual member. As stakeholders, the largest number of participants were University representatives (Figure 1).

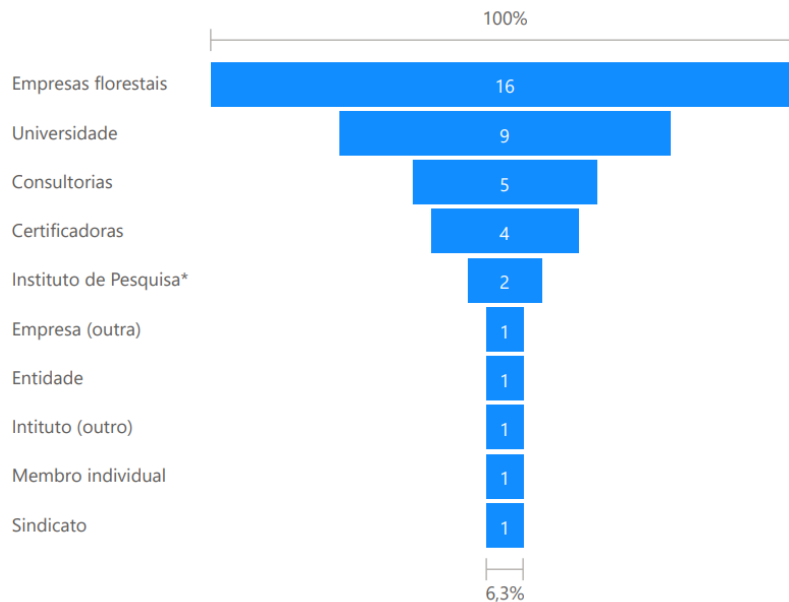


Figure 1 - Total participants by entity¹ (*) who contributed to the third Public Consultation

Based on this, 3,824 evaluations carried out on the 323 Indicators were computed. The vast majority of participants “agree” with the “Indicators” suggested in V3 by the CDP, but another 20% attributed comments proposing suggestions for “modification” and/or “exclusion” of these indicators (Figure 2).

¹ (*) One of the entities classified as “Research Institute”, refers to the consensual position of 42 companies affiliated to the Institution's Cooperative Program on Forestry Certification. But, here it was considered as a single participant response.

● Concordância ● Modificação ● Exclusão

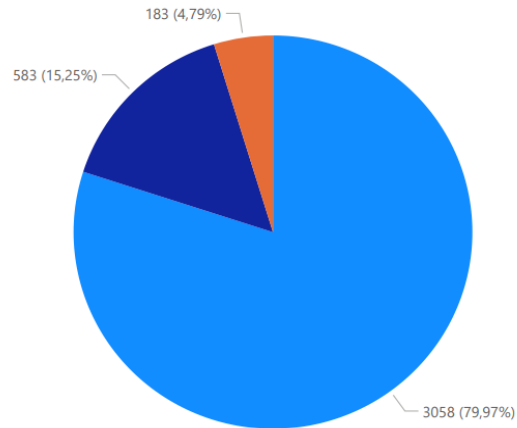


Figure 2 - Contribution of participants in the evaluation of "Indicators" by option

III – Analysis and evaluation of contributions received

a. Analysis of results focused on P&C

Principle 1 – Compliance with Laws → 8 Criteria

- 657 comments from participants were recorded for 36 indicators (Figure 3).
- **Analysis per Criterion:**
 - ✓ Greater number of indicators: C1.2 (n=6) “legal status of the management unit”; C1.3 (n=6) “legal rights to operate in the management unit” and C1.7 (n=6) “public commitment not to offer or receive bribes or other forms of corruption”;
 - ✓ Highest number of total general comments: C1.2 (n=127) and C1.3 (n=108);
 - ✓ Highest number of “modifications” suggested: C1.6 (n=31) “identify, prevent and resolve disputes involving customary issues” and C1.2 (n=28);
 - ✓ Highest number of suggested “exclusions”: C1.7 (n=14) and C1.3 (n=6).

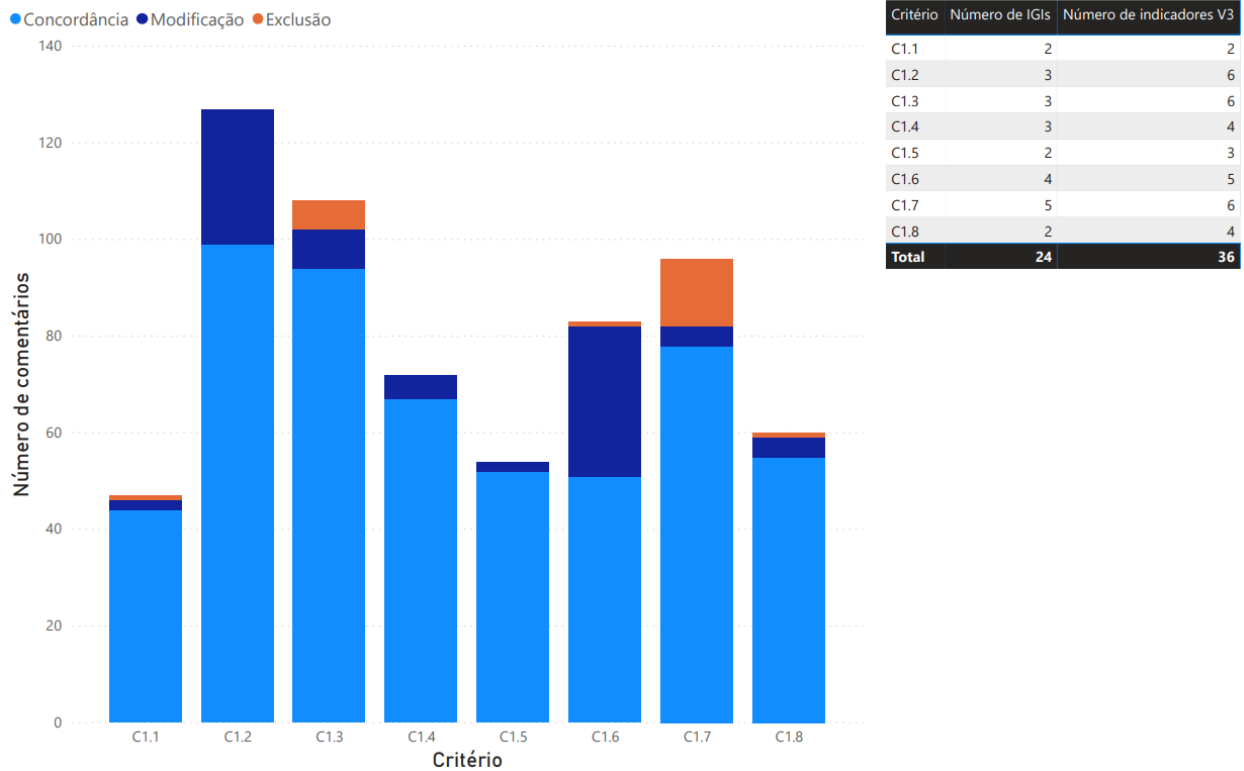


Figure 3 - Total participant comments registered per "Criterion" in Principle 1

The "Indicators" with the highest number of comments from participants for "exclusion" are summarized below:

Criterion 1.7: the two indicators I1.7.1 and I1.7.2 correspond to 71% of the total indicators suggested for exclusion (Figure 4). The "text" of the Indicator and a summary of the participants' comments are presented below.

1.7.1 (MG) A management tool that allows the mapping of organizational processes in order to identify potential weaknesses in the occurrence of acts of corruption is developed by the Organization.*

Summary of comments/justifications received from participants: the criterion, not even the IGIs indicate the implementation of this management tool, with restriction of implementation for smaller companies; although this mapping is a logical and desirable start for actions to prevent corruption, clearly this requirement is beyond the demand of the criterion and is not included in the IGIs, which also mention a management tool.

1.7.2 (MG) With the results of the mapping, preventive mechanisms are implemented to minimize vulnerabilities and avoid the practice of corruption.

Summary of comments/justifications received from participants: the comments here follow the same theme presented in indicator 1.7.1.

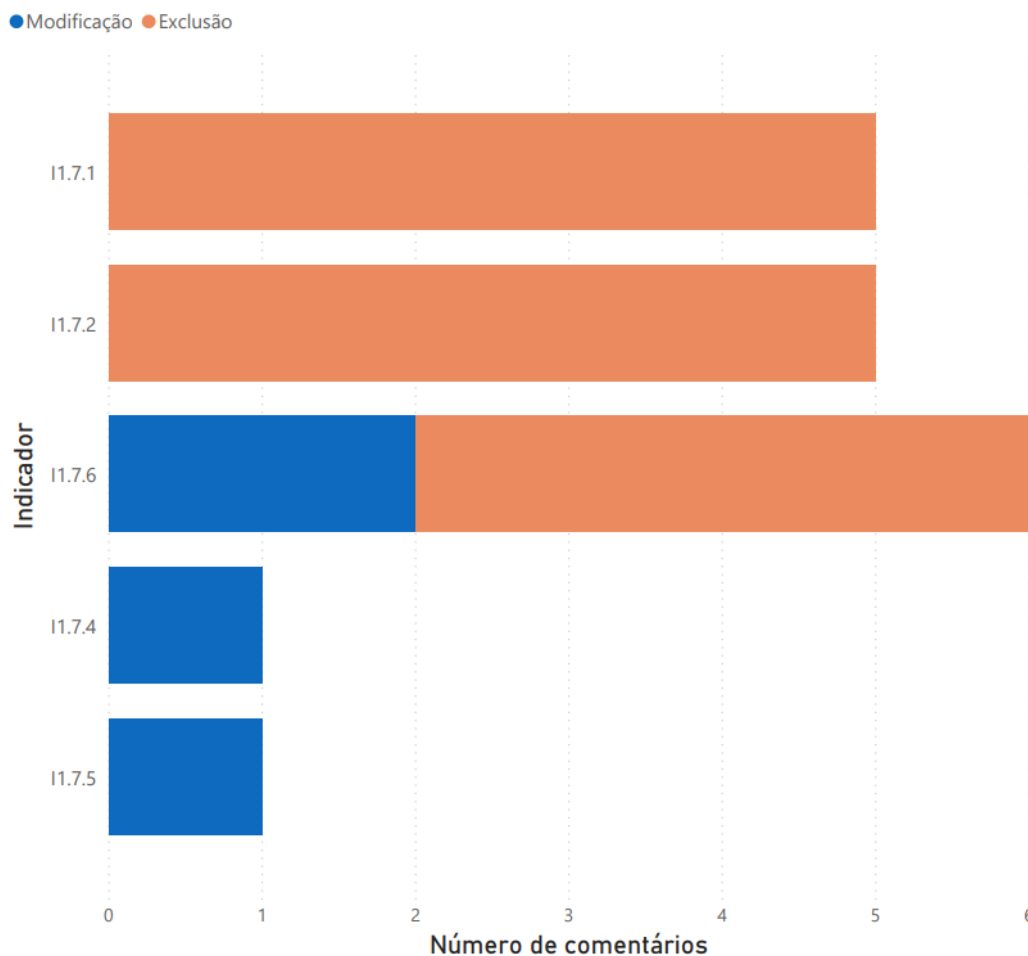


Figure 4 - Indicators with the highest number of comments from participants for "exclusion" from Criterion 1.7

Criterion 1.3: indicator I1.3.4 corresponds to 67% of the total indicators suggested for exclusion. Below is the “text” of the Indicator and a summary of the participants' comments.

I1.3.4 In the case of stages that depend on the performance of public bodies, their monitoring is registered by the Organization*.*

Summary of comments/justifications received from participants: the content of the indicator is already included in indicator 1.3.2, which also deals with the monitoring of pending issues.

Principle 2 – Workers' Rights and Conditions of Employment → 6 Criteria

➤ 845 comments from participants were recorded for 65 indicators (Figure 5).

➤ **Analysis per Criterion:**

- ✓ Greater number of indicators: C2.3 (n=26) “worker health and safety practices”; C2.1 (n=17) “principles and rights at work” and C2.2 (n=11) “promoting gender equity”;
- ✓ Highest number of total general comments: C2.3 (n=287); C2.1 (n=272) and C2.2 (n=160);
- ✓ Highest number of “modifications” suggested: C2.2 (n=35), C2.1 (n=29) and C2.3 (n=28);
- ✓ Highest number of suggested “exclusions”: C2.2 (n=28), C2.3 (n=26) and C2.1 (n=13).

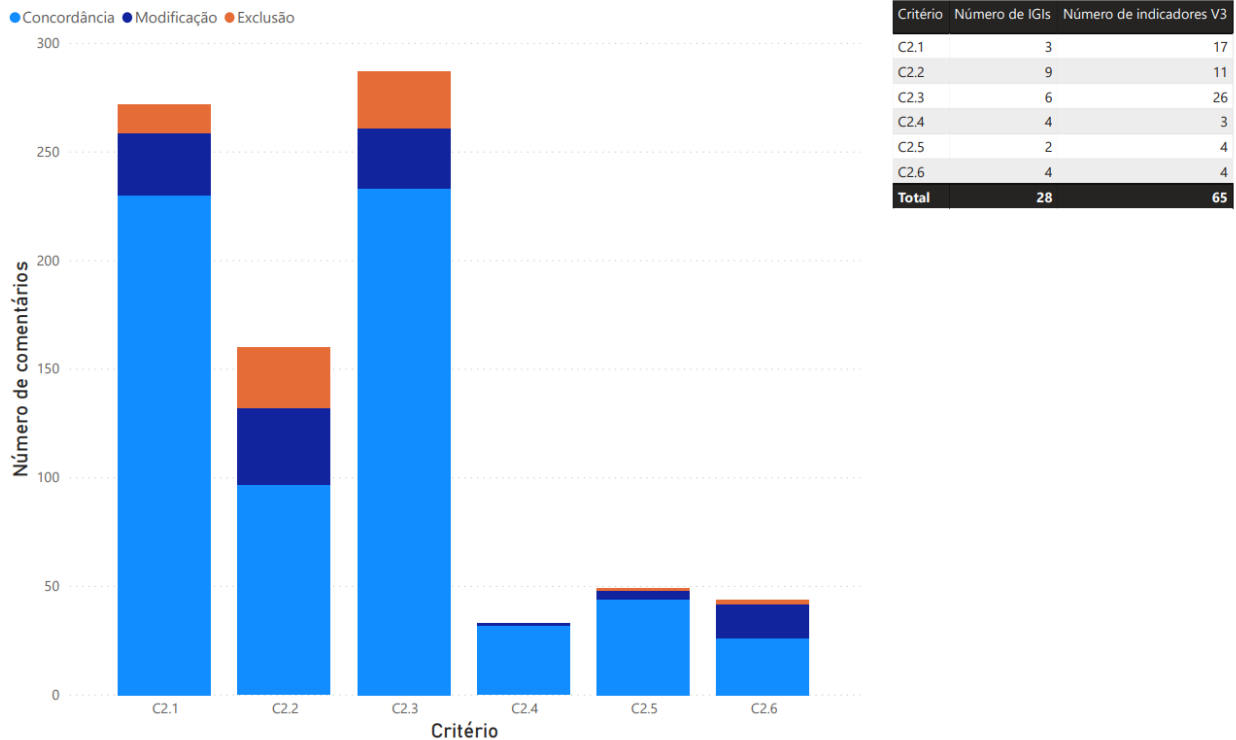


Figure 5 - Total participant comments registered by "Criterion" in Principle 2

The "Indicators" with the highest number of comments from participants for "exclusion" are summarized below:

Criterion 2.2: the three indicators I2.2.5; I2.2.8 and I2.2.9 correspond to 64% of the total indicators suggested for exclusion (Figure 6). The "text" of the Indicator and a summary of the participants' comments are presented below.

I2.2.5 (MG) The Organization has a designated person, area, instance, or committee, preferably led by women, responsible for ensuring the implementation and monitoring* of the measures and activities provided for the promotion of gender equity*, when applicable.*

Summary of comments/justifications received from participants: indicator considered biased, not promoting gender equity; it can be an interference in the form of action regarding gender equity and unnecessary in cases where gender equity is already part of the company's policy; implementation is an internal management requirement and verified at the time of audits, and the term "when applicable" does not make the indicator relevant; there is no reference to this indicator in the IGIs, the monitoring of planned measures and activities aimed at promoting gender equity is a requirement of principle 8.

I2.2.8 (MG) Meetings, management committees and/or decision-making forums are composed considering diversity and gender equity, facilitating the active participation of gender minorities.*

Summary of comments/justifications received from participants: meaningless indicator does not help in fulfilling the criterion; doubt about what decision-making forums are; content is already included in indicator 2.2.3, not harming the criterion; text redundancy.

I2.2.9 There is a policy to identify and eliminate cases of sexual harassment and discrimination based on gender and sexual orientation, which include confidentiality measures, avoiding embarrassment and

possible penalties for the affected parties.*

Summary of comments/justifications received from participants: indicator foreseen in indicator 2.2.1 and the other forecasts are included in the mechanism suggested in indicator 2.2.10; the exclusion is without prejudice to the purpose of the criteria and optimizes the audit verification process.

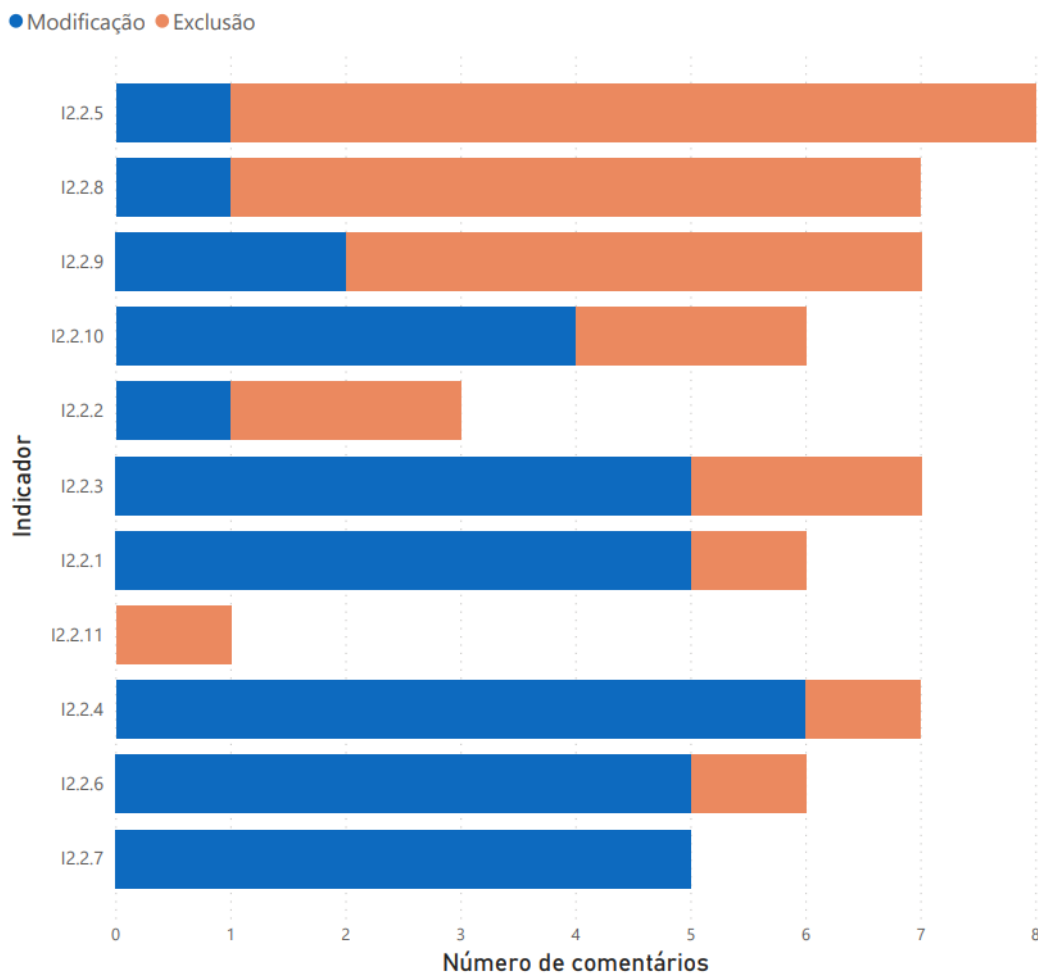


Figure 6 - Indicators with the highest number of participant comments for "exclusion" from Criterion 2.2

Criterion 2.3: the four indicators I2.3.12; I2.3.26; I2.3.21; I2.3.25 and I2.3.18 correspond to 85% of the total indicators suggested for exclusion (Figure 7). The "text" of the Indicator and a summary of the participants' comments are presented below.

I2.3.12 Workers in physically strenuous activities are instructed to take brief breaks during the workday.*

Summary of comments/justifications received from participants: indicator 2.3.11 already covers the topic, generating subjectivity in the interpretation of what would be strenuous activities.

I2.3.26 Workers in activities involving application, handling, storage, transport and final disposal of chemical products receive specific guidance on the recommendations for use, handling and storage of these products as recommended by current legislation and know the emergency procedures in cases of accidental spills .*

Summary of comments/justifications received from participants: the indicator is already included in compliance with the relevant legislation; the content is already covered in criterion 2.5 and indicators 2.3.23 and 2.3.24.

12.3.21 The organization has a procedure aimed at preventing work-related accidents and work-related illnesses and evaluating related actions. Such processes are proportional to scale, intensity and risk*.*

Summary of comments/justifications received from participants: the indicator is already included in other indicators of this criterion; the indicator is covered in indicators 2.3.1, 2.3.16, 2.3.17 and 2.3.18.

12.3.25 Workers developing activities that involve the application or handling of chemical products are monitored through specific medical exams (if any) regarding the products used.*

Summary of comments/justifications received from participants: specific exams are included in indicator 2.3.23.

12.3.18 Incidents and accidents at work are evaluated, and when failures are identified, they are reflected in the review of health and safety practices.*

Summary of comments/justifications received from participants: unite the content in indicator 2.3.16, and indicators 2.3.16, 2.3.17 and 2.3.18 may generate sequential non-conformities. The themes are interdependent and were already being treated together in the harmonized standard.

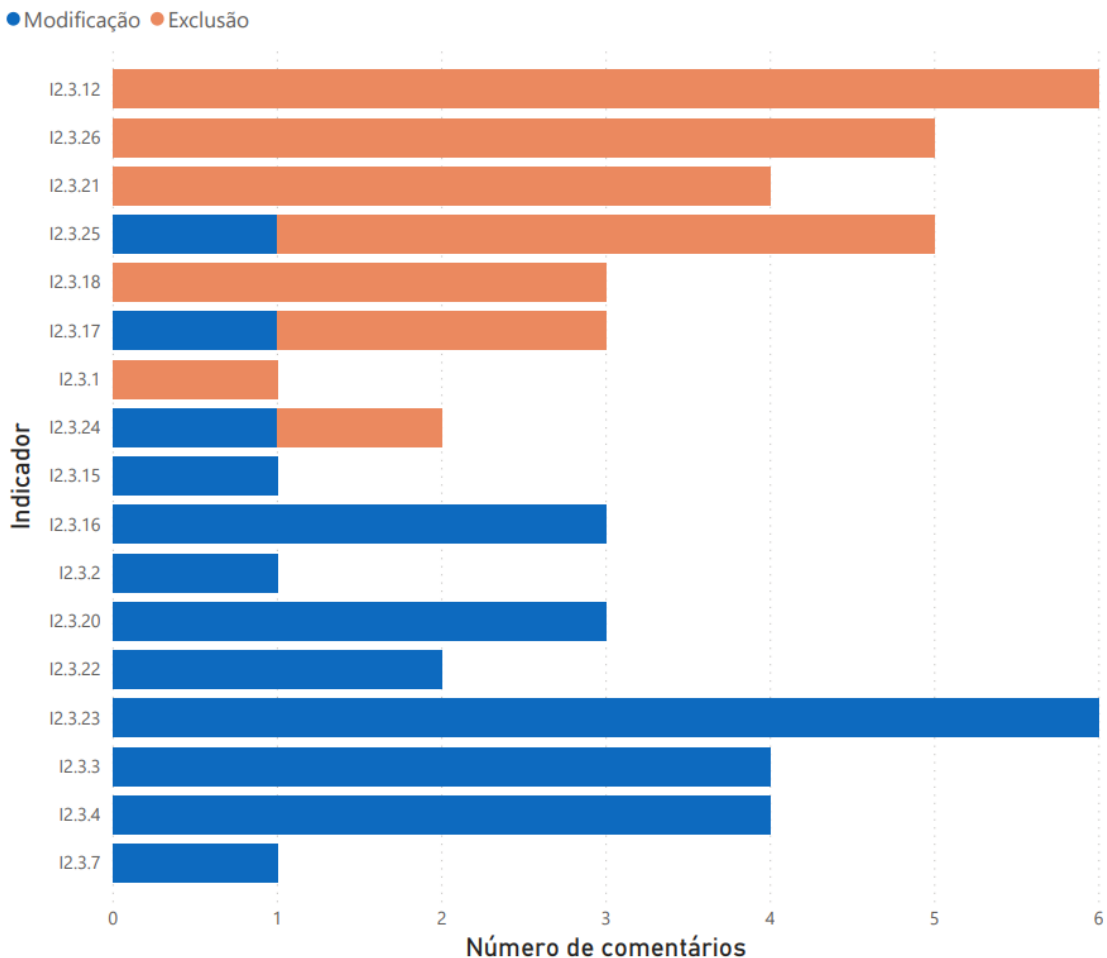


Figure 7 - Indicators with the highest number of participant comments for "exclusion" from Criterion

2.3

Criterion 2.1: the two indicators I2.1.19 and I2.1.5 correspond to 85% of the total indicators suggested for exclusion (Figure 8). The “text” of the Indicator and a summary of the participants' comments are presented below.

I2.1.9 The clauses of collective and individual agreements negotiated between the Organization, union organizations* and workers*, relating to working conditions, when they exist, take into account their impacts on the health and safety of workers* and respect health standards , hygiene and safety.*

Summary of comments/justifications received from participants: the indicator refers to a content outside the audit scope of the management unit; there are already specific agreements related to occupational health and safety and their regulatory norms from the Ministry of Labor; in the criterion, there is no element related to health and safety impacts on workers, being addressed directly in criterion 2.3, which makes the audit difficult; wording of the indicator allows subjective interpretations and difficulty in auditing; the content of the indicator focuses on the outcome of the negotiations that must be within the scope of the agreement itself and not be delimited in an indicator.

I2.1.5 The organization respects the full freedom of workers' organizations to draw up their constitutions and rules.*

Summary of comments/justifications received from participants: the indicator is beyond the scope of the management unit audit; difficulties in auditing regarding the issue of the organization of workers in preparing their constitutions and rules; the term “constitutions and rules” is not clear, in addition to allowing subjective interpretations, and its applicability is outside the scope of the management unit's audit.

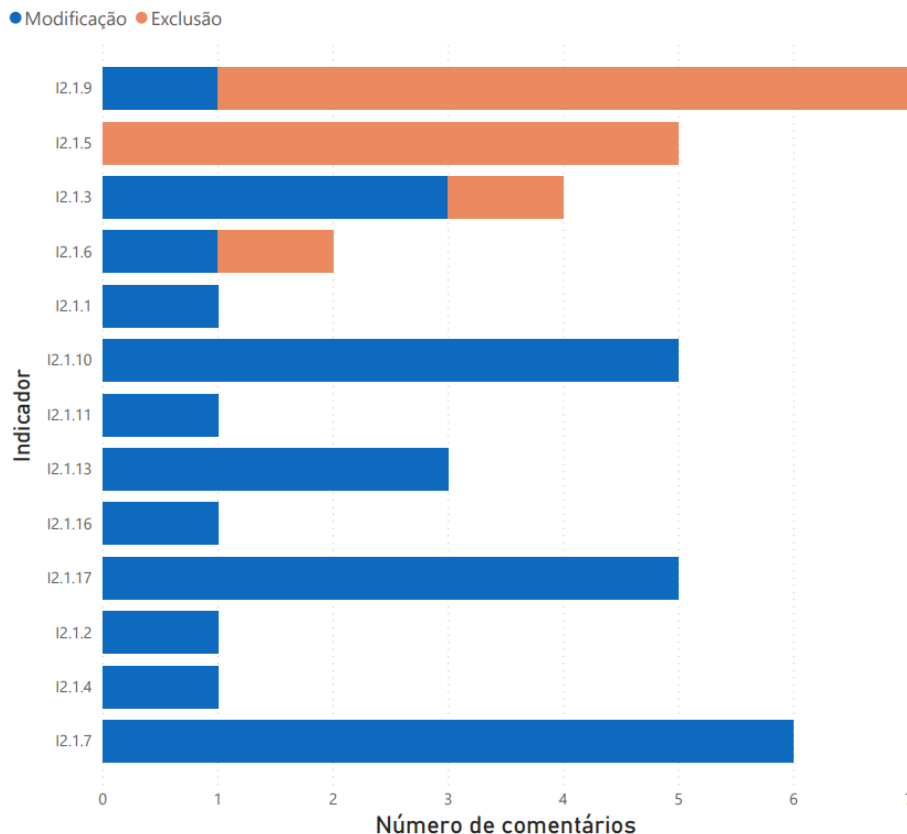


Figure 8 – Indicators with the highest number of participant comments for “exclusion” from Criterion 2.1

Principle 3 – Rights of Indigenous Peoples → 6 Criteria

- There were 190 comments from participants for 21 indicators (Figure 9).
- **Analysis per Criterion:**
 - ✓ Greater number of indicators: C3.2 (n=6) “respect for the legal and customary rights of indigenous peoples”;
 - ✓ Highest number of overall general comments: C3.2 (n=60) and C3.5 (n=32) “identify areas of cultural, ecological, economic, religious or spiritual importance for indigenous peoples”;
 - ✓ Highest number of "modifications" suggested: C3.2 (n=7) and C3.5 (n=5);
 - ✓ There was no suggested “exclusion”.

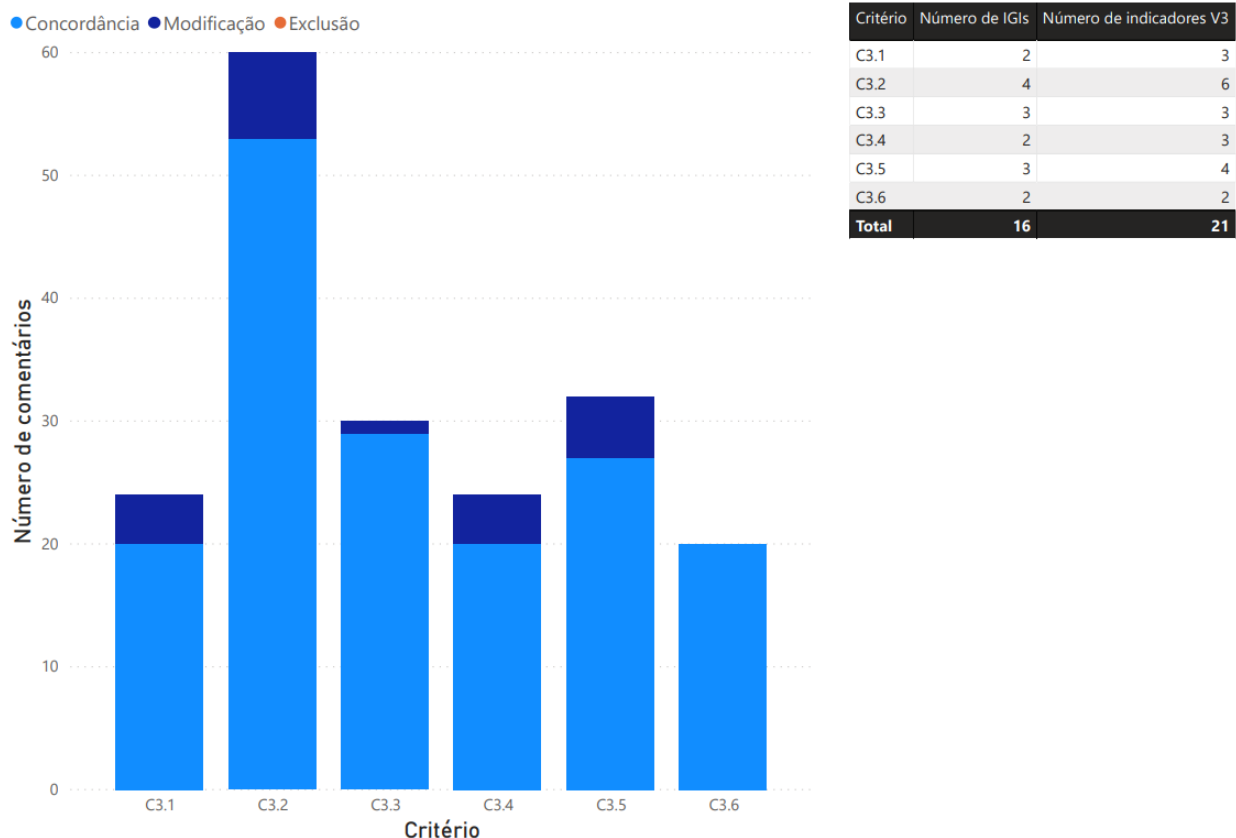


Figure 9 - Total participant comments registered by "Criterion" in Principle 3

Principle 4 – Community Relations → 8 Criterion

There were 276 comments from participants for 27 indicators (Figure 10).

- **Analysis per Criterion:**
 - ✓ Highest number of indicators: C4.6 (n=5) “mechanisms to resolve complaints”;
 - ✓ Highest number of total general comments: C4.6 (n=50); C4.2 (n=48) “respect the customary

- and legal rights of local communities” and C4.1 (n=40) “identify local communities within the management unit”;
- ✓ Greater number of “modifications” suggested: C4.6 (n=25), C4.7 (n=18) “identification of places of cultural ecological, economic, religious or spiritual importance for local communities” and C4.5 (n= 14) “identify, avoid and mitigate social impacts”;
- ✓ Highest number of suggested "exclusions": C4.6 (n=5), C4.5 (n=5) and C4.2 (n=4).

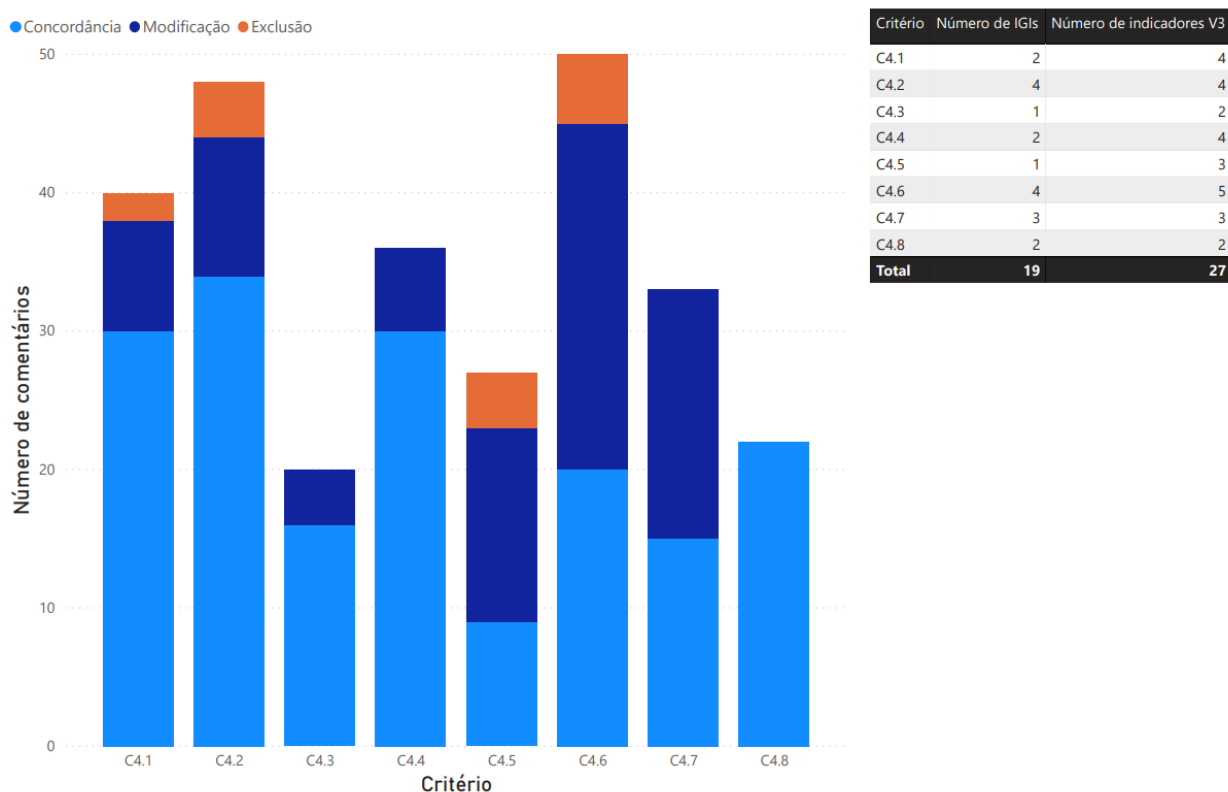


Figure 10 - Total participant comments registered by "Criterion" in Principle 4

Principle 5 – Forest Benefits → 5 Criterion

There were 138 comments from participants for 19 indicators (Figure 11).

➤ **Analysis per Criterion:**

- ✓ Greater number of indicators: C5.1 (n=6) “identify, produce or enable the production of benefits and/or diversified products”;
- ✓ Highest number of total general comments: C5.1 (n=42); C5.3 (n=33) “positive and negative externalities”;
- ✓ Highest number of “modifications” suggested: C5.3 (n=16) and C5.1 (n=13);
- ✓ Highest number of suggested “exclusions”: C5.1 (n=3).

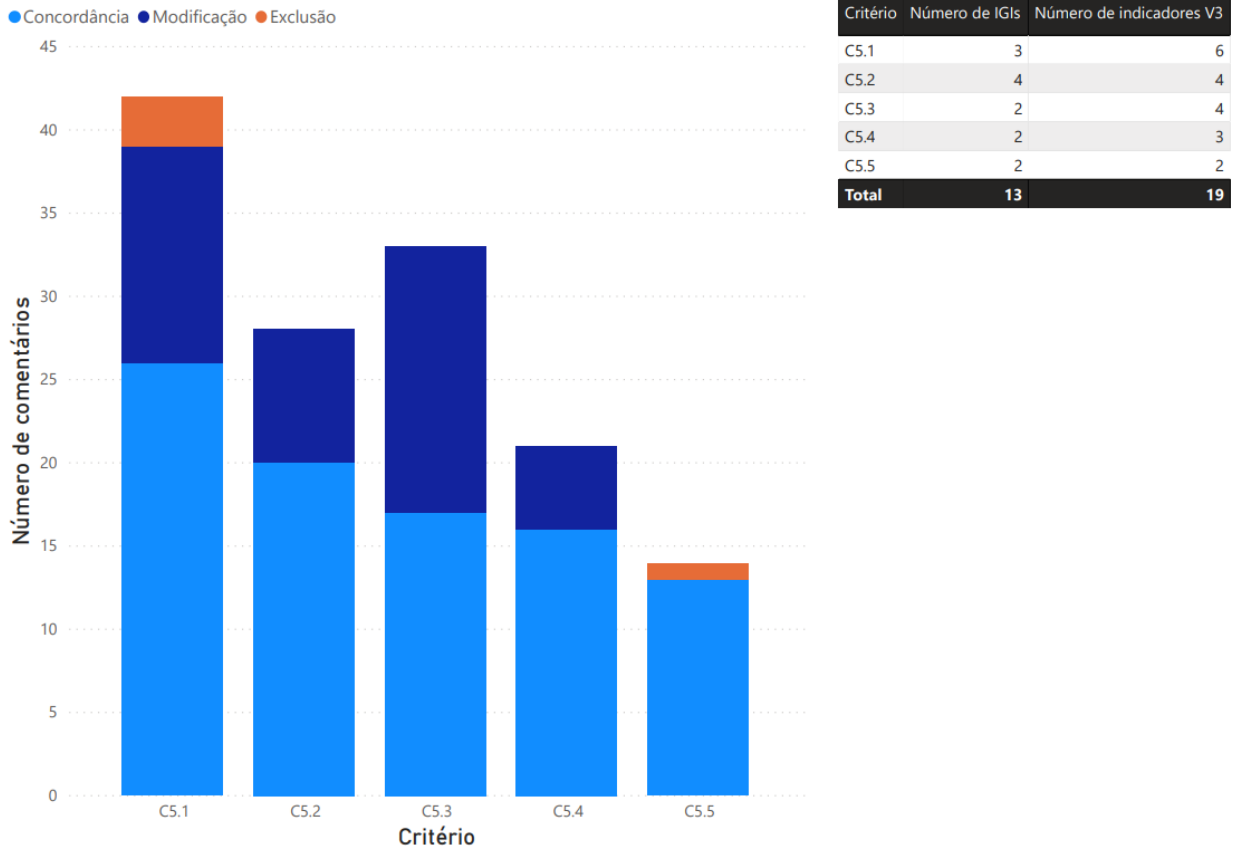


Figure 11 - Total participant comments recorded by "Criterion" in Principle 5

Principle 6 - Environmental Impacts and Values → 10 Criteria

- There were 564 comments from participants for 39 indicators (Figure 12).
- **Analysis per Criterion:**
 - ✓ Greater number of indicators: C6.5 (n=8) “identify and protect representative sample areas”;
 - ✓ Highest number of overall general comments: C6.5 (n=119) and C6.4 (n=105) “protection of rare and threatened species and their habitats”;
 - ✓ Highest number of “modifications” suggested: C6.5 (n=31) and C6.1 (n=18) “evaluate the environmental values in the management unit”;
 - ✓ Highest number of suggested “exclusions”: C6.4 (n=8) and C6.5 (n=4).

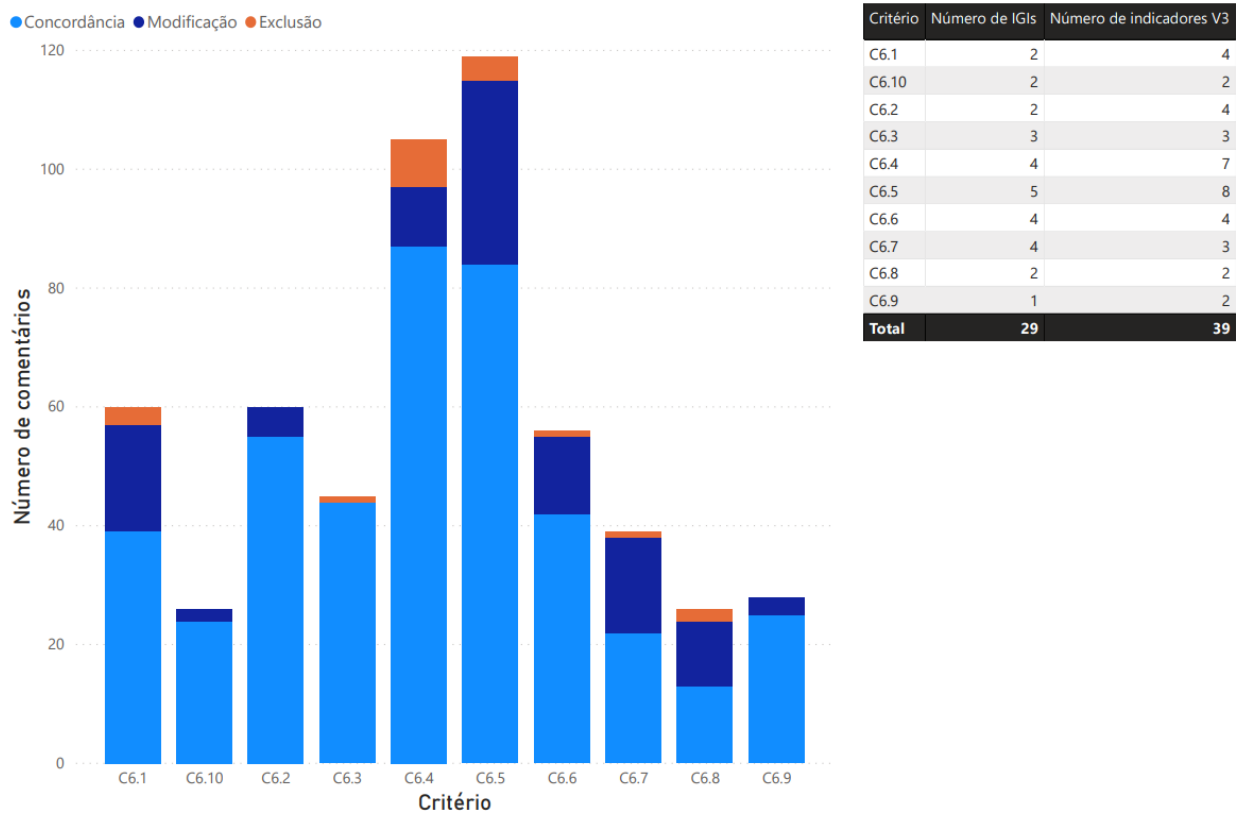


Figure 12 - Total participant comments registered by "Criterion" in Principle 6

The "Indicator" with the highest number of comments from participants for "exclusion" is summarized below:

Criterion 6.4: indicator I6.4.7 corresponds to 87% of the total indicators suggested for exclusion. Below is the "text" of the Indicator and a summary of the participants' comments.

16.4.7 (MG) Articulation with recognized public and/or private initiatives, preferably local, for the protection of endangered species*, rare species*, endemic species*, and their habitats* exists, when feasible, considering the scale, intensity and risk * of management operations.*

Summary of comments/justifications received from participants: by whom would these public and/or private initiatives be recognized? articulating with public and/or private initiatives is not included in the elements of the Criterion. Furthermore, the indicator is subjective. What would be recognized institutions? Recognized how? By whom? Furthermore, having it "when feasible" makes the indicator lose its relevance; difficult implementation by Organizations and certifiers due to subjectivity in the definition of the phrase "recognized private initiatives"; Who would recognize the initiatives? Which organizations would do this accreditation?

Principle 7 - Management Planning → 6 Criteria

- 270 comments from participants were recorded for 27 indicators (Figure 13).
- **Analysis per Criterion:**
 - ✓ Greater number of indicators: C7.2 (n=9) "management plan implementation";

- ✓ Highest number of overall general comments: C7.2 (n=90) and C7.4 (n=50) “management planning update and review” and C7.6 (n=50) “involvement of affected parties in planning management and monitoring”;
- ✓ Highest number of “modifications” suggested: C7.2 (n=18) and C7.6 (n=10);
- ✓ Highest number of suggested “exclusions”: C7.4 (n=5); C7.5 (n=4) and C7.6 (n=4).

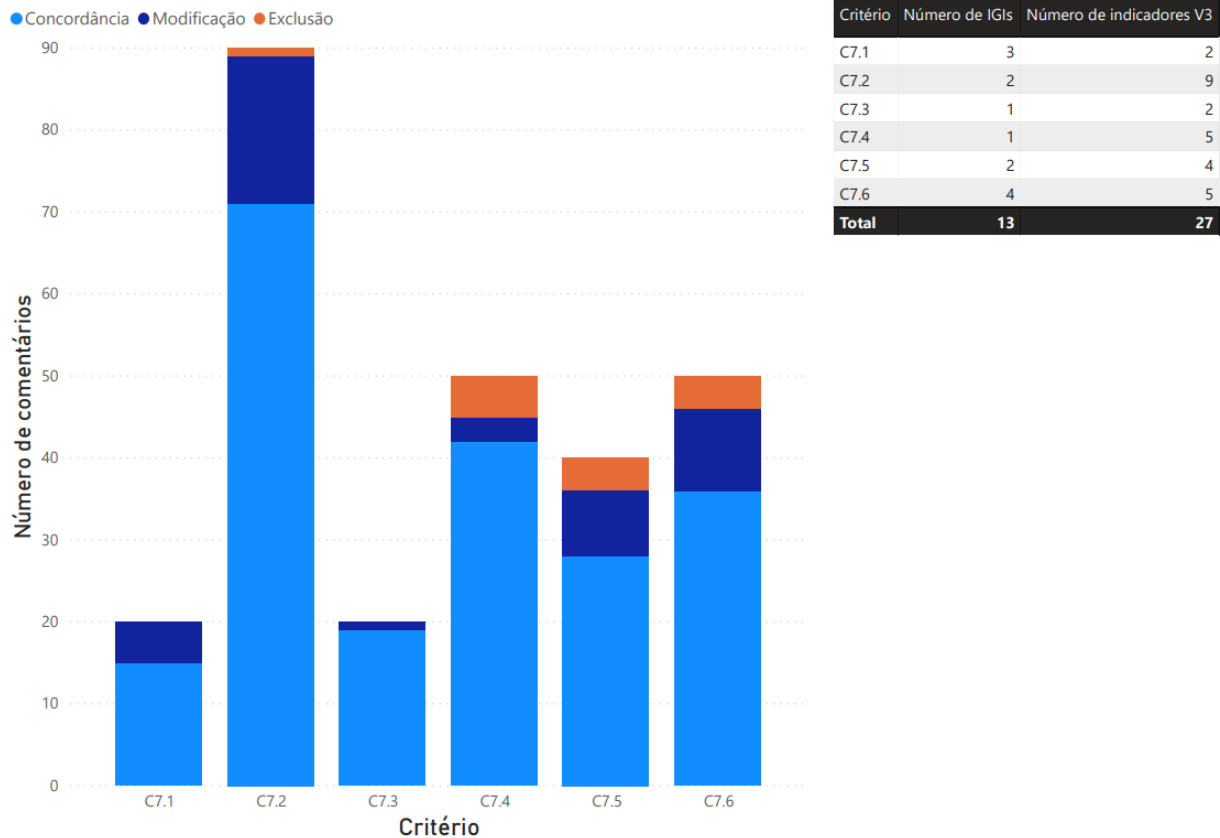
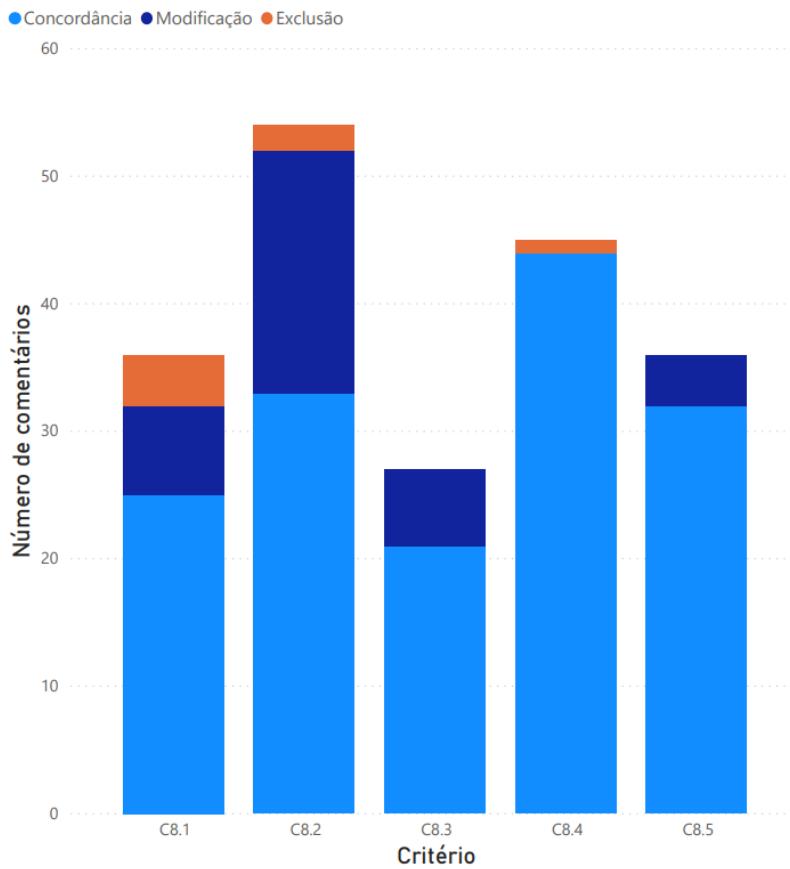


Figure 13 - Total participant comments registered by "Criterion" in Principle 7

Principle 8 - Monitoring and Assessment → 5 Criteria

- 198 comments from participants were registered for 22 indicators (Figure 14).
- **Analysis per Criterion:**
 - ✓ Greater number of indicators: C8.2 (n=6) “monitor and assess environmental and social impacts”;
 - ✓ Highest number of overall general comments: C8.2 (n=54) and C8.4 (n=45) “summary of public monitoring results”;
 - ✓ Highest number of “modifications” suggested: C8.2 (n=19);
 - ✓ Highest number of suggested “exclusions”: C8.1 (n=4).



Critério	Número de IGLs	Número de indicadores V3
C8.1	1	4
C8.2	2	6
C8.3	2	3
C8.4	1	5
C8.5	3	4
Total	9	22

Figure 14 - Total participant comments registered by "Criterion" in Principle 8

Principle 9 – High Conservation Values → 5 Criteria

- 160 comments from participants were recorded for 16 indicators (Figure 15).
- **Analysis per Criterion:**
 - ✓ Greater number of indicators: none, as they all have the same number of indicators;
 - ✓ Greater number of total general comments: none, as they all had the same number of comments;
 - ✓ Highest number of “modifications” suggested: C9.3 (n=7) “Implement strategies and actions that maintain AAVC”;
 - ✓ Most suggested “exclusions”: C9.1 (n=8) “maintain or improve HCVs”.

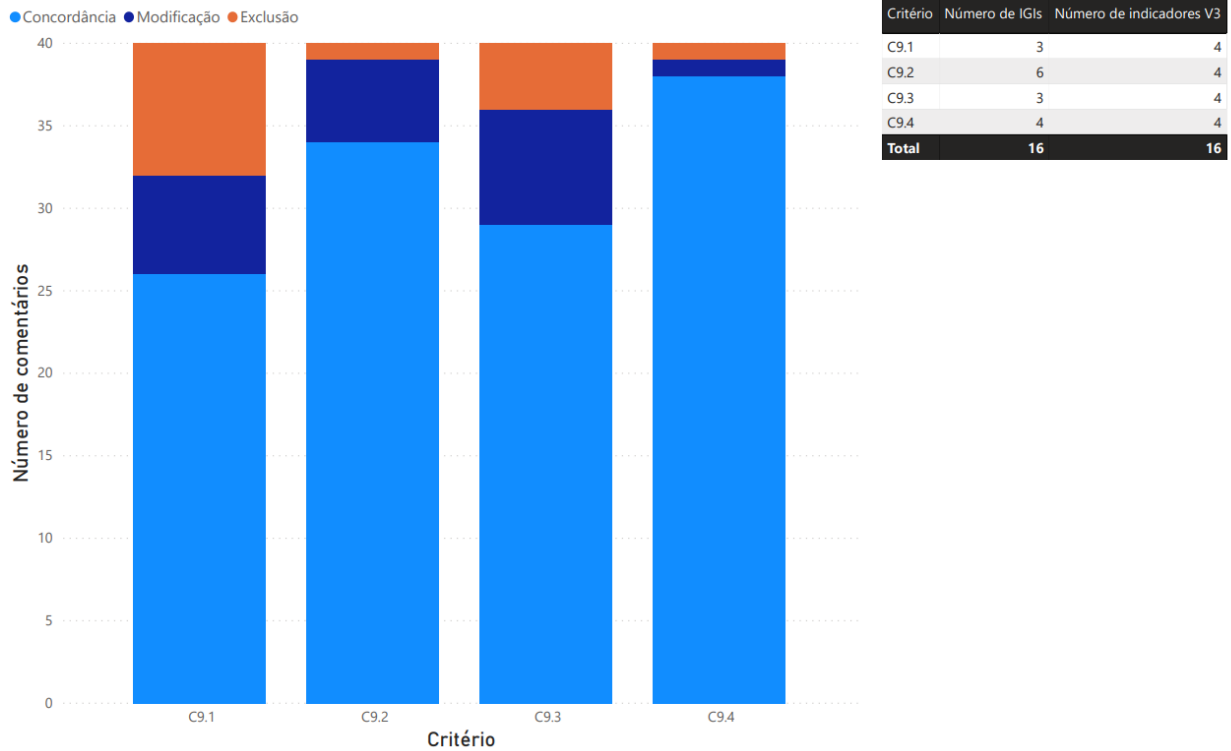


Figure 15 - Total participant comments recorded by "Criterion" in Principle 9

Principle 10 – Implementation of Management Activities → 12 Criteria

- There were 536 comments from participants for 51 indicators (Figure 16).
- **Analysis per Criterion:**
 - ✓ Greater number of indicators: C10.6 (n=8) “minimize or avoid the use of fertilizers” and C10.12 (n=8) “waste disposal”;
 - ✓ Highest number of overall general comments: C10.6 (n=88), C10.12 (n=80) and C10.7 (n=77) “integrated pest management”;
 - ✓ Highest number of “modifications” suggested: C10.9 (n=7) “potential negative impacts of natural disasters”;
 - ✓ Highest number of suggested “exclusions”: C10.10 (n=9) “infrastructure management, transport and forestry activities”.

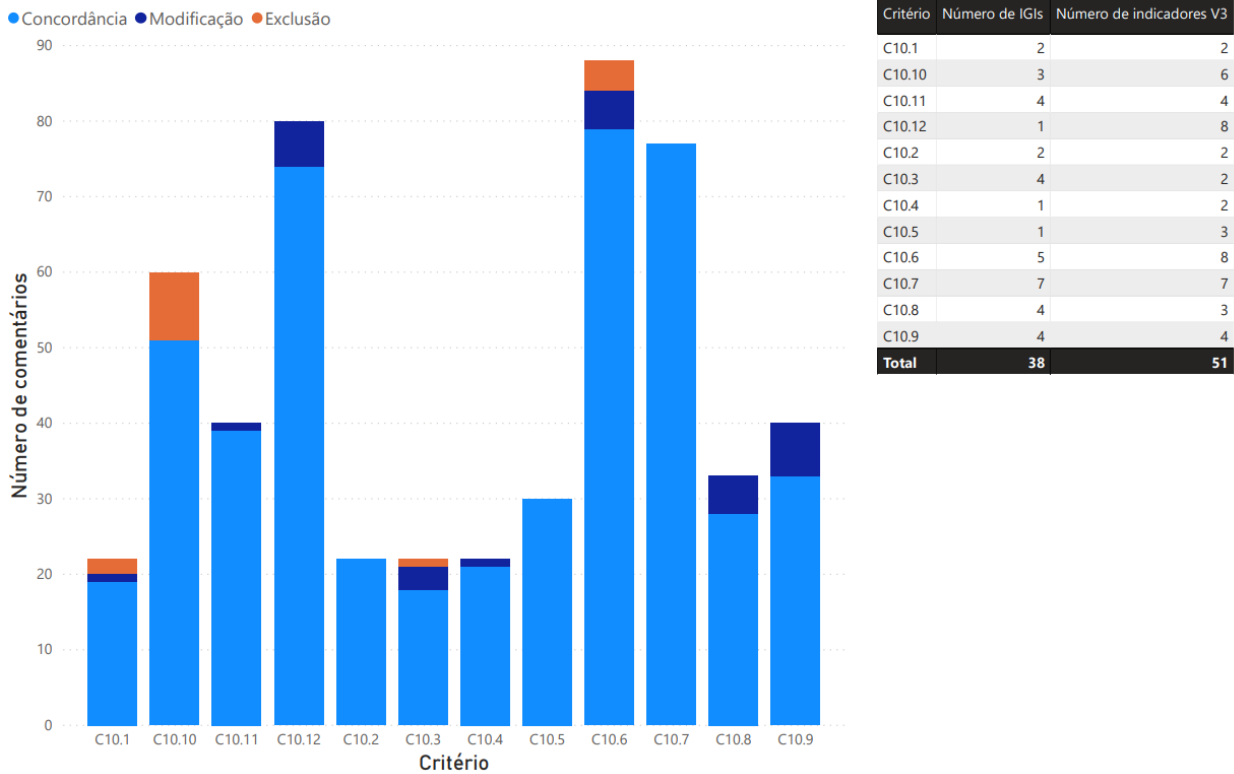


Figure 16 - Total participant comments registered by "Criterion" in Principle 10

The "Indicators" with the highest number of comments from participants for "exclusion" are summarized below:

Criterion 10.10: the three indicators I10.10.4; I10.10.5 and I10.10.6 correspond to 100% of indicators suggested for exclusion. The "text" of the Indicators and a summary of the participants' comments are presented below.

I10.10.4 (MG) A micro-planning is designed and implemented for the harvest considering the protection of environmental values* and contemplating procedures, maps and/or sketches.*

Summary of comments/justifications received from participants: Criterion 10.10 does not address planning or micro-planning and neither do IGIs. In addition, the indicator makes the criterion more complex, without reference in the IGIs for this purpose; this criterion does not address planning or micro-planning.

I10.10.5 (MG) A micro-planning is designed and implemented for activities aimed at infrastructure considering the protection* of environmental values*, and contemplating procedures, maps and/or sketches.*

Summary of comments/justifications received from participants: the comments here follow the same theme presented in indicator 10.10.5.

I10.10.6 (MG) Micro-planning is designed and implemented for forestry activities considering the protection of environmental values*, and contemplating procedures, maps and/or sketches.*

Summary of comments/justifications received from participants: the comments here follow the same theme presented in indicators 10.10.4 and 10.10.5.

GENERAL SUMMARY

Based on the options “modification” and “exclusion”, it is important to point out that the comments of the participants, when evaluated as “modification”, in summary, culminated in “adjustments aiming at a better clarity and understanding of the indicator”. For the “exclusion” option, comments were based on the lack of connection with the IGIs or questions about difficulties in applicability in auditing or unnecessary.

Therefore, we found in general that Principle 2 (n=70), Principle 1 (n=23), Principle 6 (n=20) and Principle 10 (n=16) received the highest number of suggested comments from participants for “exclusion” of indicators (Figure 17). Thus, we listed the most significant Criteria (Figure 18):

- ✓ Principle 2 were three Criteria (C2.2; C2.3 and C2.1)
- ✓ Principle 1 were two Criteria (C1.7 and C1.3)
- ✓ Principle 6 and Principle 10 only one Criterion (C6.4) and Criterion (10.10)

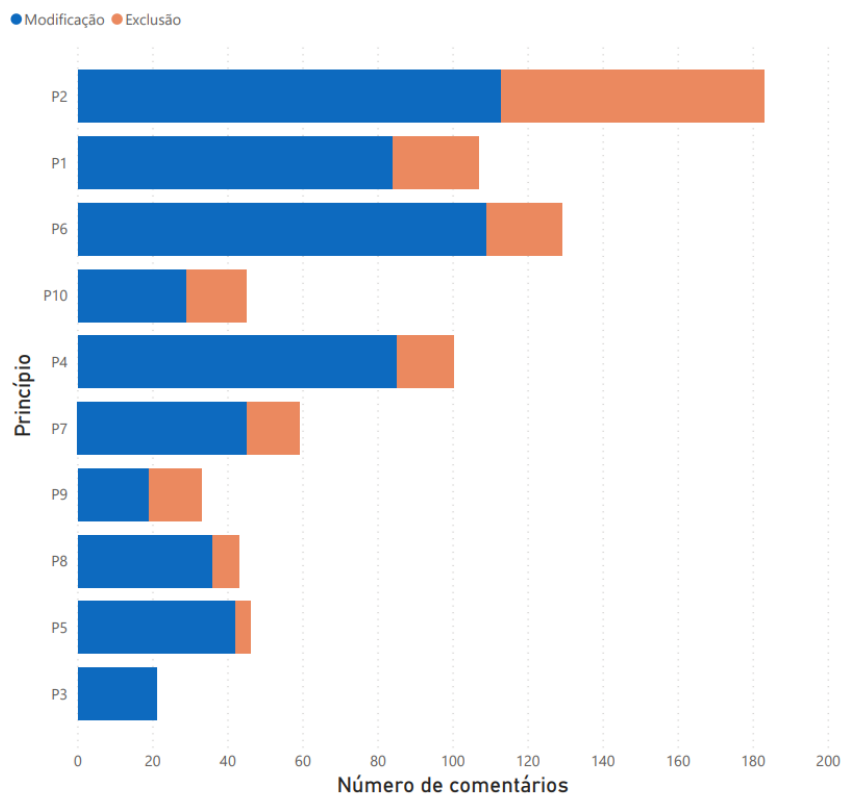


Figure 17 - Principles with the highest number of comments from registered participants for "exclusion" of indicators from the standard

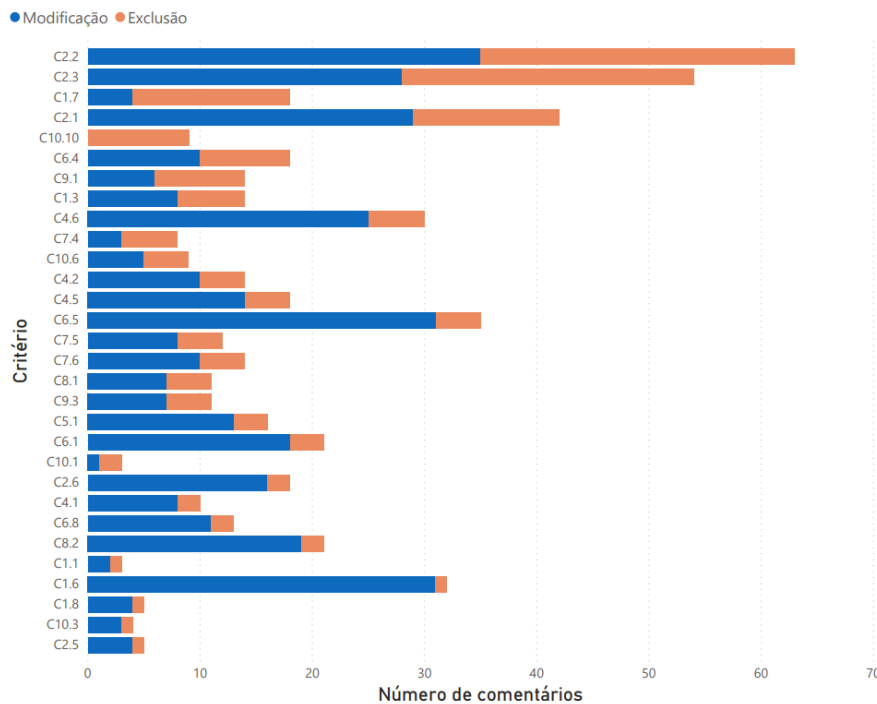


Figure 18 - Criteria with the highest total number of comments from registered participants for "exclusion" of indicators from the standard

IV – Next steps

- ✓ All comments from participants were evaluated by the Plantations Standard Development Committee and drafted version 4 of the new “FSC National Standard for Assessment of Plantation Management in Brazil”.
- ✓ Then, the document will proceed for approval in different other instances, namely:
 - FSC Brasil Board of Directors: analysis of national issues;
 - PSU (Performance and Standard Unit): unit within FSC International responsible for the transfer process;
 - PSC (Policy and Standards Committee): approval of the committee formed by FSC International members