

Advice Note on Motion 65 cut off date
Synopsis for the Public Consultation feedback

Document type	Code	Version No.	Draft No.	Circulated	Policy Manager	Consultation	Deadline for comment	Compilation date
ADVICE NOTE	ADV-20-007-018	V1-0	0	01/10/ to 06/12/2016	Dr. Pasi Miettinen	Public	06/12/2016	01 - 31/12/2016

Source of comments	Nr of respondents
Economic North	8
Economic South	4
Social South	1
Environmental North	7
Environmental South	4
National Offices	4
Research Institute	1
Unspecified response in Portuguese	1
total	30

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
ADVICE-20-007-018	3/Economic 2/Environment	Economic: Advice Note does not speak about ICL This advice note is very confusing, both in its structure and its content. <u>Structure:</u> a), The notice should be more clearly separated into two sections; 1st section being directed to CH and CBs and 2nd section being directed to SDGs. b). Using the same numbering for the two options under advice #2 and the numbering of requirements for #1 isn't helpful. Environment: I do not support the draft Advice Note as written. It is too vague. It is not consistent with the intent of Motion 65. It seems also unfair in Option 1 clause 1.1 to ask SDGs to provide updated work plans when the advice from PSU and/or the HCV TWG is also not clear.	Economic: Remove ICL from title Environment: We strongly encourage FSC to fully comply with the intent of Motion 65 default indicator by putting in place a temporary halt to logging in at least 80% of IFLs in FSC forests, until robust indicators are implemented. This is the cleanest and simplest way of safeguarding IFLs while indicators are being developed.	The concept of ICL can not be removed, because it is elementary to the Canadian dialogue and very useful for addressing M65, points 3 and 8. In case other countries have other solutions for engaging the Indigenous People, they are allowed to drop the concept. We'll simplify the structure of the next version of the Advice Note
Normative reference	3/Economic	Economic: The Advice Note doesn't refer "FSC-PRO-60-006 V2-0 EN" although it conflicts with it when it imposes strict timelines for the completion of the transfer process.	Economic: add FSC-STD-60-002, FSC-STD-60-006; FSC-PRO-60-006 Proposed end date: January 01 2019	We'll add these normative references to the next version of the Advice Note

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
Effective date	1/Economic	Important that the period that this Advice applied be made clear – start date and expiry date explicitly stated in the scope, as it is only intended as a temporary measure		We'll define expiry date to the next version of the Advice Note
Scope	5/Economic 5/Environment 1/National Office	Economic: It is hard to understand why the Advice note only apply to four countries/regions. According to www.intactforests.org, "IFL existed in 64 countries in year 2013 In general it is believed that this issue is too important to be dealt in such a short timeframe. CH are interested in dealing with the issue in a rational and scientific based way. The type of operations (very little impact) and the legal binding obligation of the central African certificate holders to respect their management plan should entitle them not to be concerned by transition measures. The advice should be applied to all IFLs globally, for consistency and to address vulnerable areas outside the	Economic: The Advice Note should apply to all IFL countries Environment: This Advice Note applies to Network Partners, Standard Development Groups, certificate holders and Certification Bodies operating in countries where IFLs are present . National Office: Specify in the scope the implications to Controlled Wood	The Steering Committee decided to expand the Section 1 to apply in all IFL countries

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		priority regions. It is critically important that Indonesia is included as well as the full Amazon Basin. Environment: Scope must be extended to include all countries with IFLs. This is important because the existing scope may not apply to some IFLs which are the most rare and/or vulnerable. Also the applicable dates should be included here as the Advice Note is meant to be a temporary measure.		
Terms & definitions	10/Economic 1/Social 5/Environment 3/National Offices 1/Research	Economic: General flexibility in establishing and managing IFLs is needed in Canada “Human economic activities” is a new term. Terminology and definitions should be consistent with pre-existing terms in the IGIs, the FSC Glossary of Terms and other standards and policies. The word “commercial” is used in the IGIs and thus should also be used in the definition of IFLs. <u>IFL Definition</u> Most forest in the world, including in the tropics have been influenced by	Economic: Option 1 : In case a national or regional definition is set to fit the local conditions, this definition will apply. Option 2: The default definition for IFL is “A territory... source WRI etc.” applies in case no regional or national definition applies. ... Intact Forest Landscapes maps accessed through Global Forest Watch <u>as a baseline</u> . “territory within today's global extent of forest cover which contains forest and non-forest ecosystems minimally influenced by commercial activities...”	The definition for IFL given in FSC-STD-60-004 for IGIs is intended to be a starting point to the SDGs for national or regional definition. The definition can be elaborated further using Best Available Information. The SDG is also better positioned to define what exactly ‘minimally influenced by human activity’ means. The definition for Indigenous Cultural

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		humans significantly, which have created also many secondary, disturbed forests. The concept of 'Intactness' is very arbitrary and has been abandoned in ecology since long time, in the same way as 'Climax forest'. These are concepts that applied to an idealistic view, without looking at the longer perspective. Also, it is known that intermediate disturbance brings higher biodiversity as it creates more 'niches' for different species. In general FSC should include the fact that IFL definition will be refined at the national or regional level to fit local conditions. And FSC shall allow to define at the regional and national level what exactly 'minimally influenced by human activity' means. "Core Area of IFL" and ICL are defined but not referenced in any way in the advice note. Definition of "Core area of IFL" is not consistent with "Core areas" as defined in draft standard FSC-STD-60-004 V1-1.	Delete the definition of ICL. <i>Get the concept discussed and approved by Membership, before it can be included in the FSC standard as it entails a significant change of the FSC FM standard.</i> Define "IFL degradation" Environment: Specify which human economic activities alter the intactness of IFLs. Replace the provided definition by "Core area of IFL (FSC-STD-60-004 V1-1): <i>The portion of an Intact Forest Landscape* where intactness is maintained, that contains the most important ecological and cultural values and where timber harvesting and road building are generally not permitted."</i> Modifications to Brazil: (i) Core area of IFL is at least 15% of the Intact Forest Landscape falling within the management unit, to be included to the Conservation Area Network. (ii) Delete Indigenous Cultural Landscape from the definition as it was not a part of the motion 65	Landscape is formulated by the Permanent Indigenous Peoples Committee, which has a mandate of the FSC Board of Directors. FSC respects the Indigenous Peoples self-determination rights and the definition of ICL belongs to the sphere of United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). As nobody commented the phrasing of definition, we'll keep it as it is. We respect the support given by all Brazilian chambers to the RIL-based forest management in Amazon. However, as the generic concept of RIL is loose, it is important to specify exactly which are the indicators for RIL in Amazon, what "minimal human influence" means

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		In Brazil, Core Area: stakeholders and Network Partners have sent their comments against the definition of 80% of the IFL area as core area. Core areas must be a composition of the Network Conservation Area were the total would be maximum 15% Definition of “Core area of IFL” is not consistent with “Core areas” as defined in draft standard FSC-STD-60-004 V1-1. <u>ICL Definition:</u> This concept is completely new to the FSC system. Therefore, in compliance with FSC procedures, if to be included in the FSC FM standard, it should be approved by the membership, different chambers, the GA. Social: Supports Economic and Environmental chamber vision on RIL and limiting the core area as 15%. Suggests deleting ICL concept from the Advice Note as it was not mentioned in the Motion Environment: In Brazil, Reduced Impact Logging practises are so	In Brazil: Modification: Core area of IFL: At least 15% of the intact forest landscape falling within the management unit, composed by the Network Conservation Area National Office: <i>Best available information*</i>, of ecological and/or social sources, relevant to IFLs and ICLs, should be acceptable. As example, Global Forest Watch Canada (example for Canada), local eco-forest maps used for forest management planning, and references specific to ICLs and Indigenous cultural values could be included. <i>* Best Available Information:</i> Data, facts, documents, expert opinions, and results of field surveys or consultations with stakeholders* and engagement with Indigenous Peoples that are most credible, accurate, complete, and/or pertinent and that can be obtained through reasonable* effort and cost, subject to the scale* and intensity* of the management activities* and the Precautionary Approach*. The definition of core should be developed through a rigorous process and in collaboration with regional Network partners to be representative of regional realities.	and how the related legislation is formulated. We'll take out the definition for a Core area from the next version of the Advice Note, because it will not be referred in the text any more

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		delicate that they enable maintaining the intactness within forest concessions. These managements units continue to be classified as IFL at the international evaluation. Therefore there is no need of stop the Reduced Impact Logging operations in Brazil National Offices: Global Forest Watch is mentioned as the only data source. This data is useful to get a quick and first idea of where Intact Forests are located but not precise enough and updated enough to make such important decision on. The Indigenous Chamber has identified concerns about the identification and mapping of IFLs, since a process of identification and mapping influences national and provincial policies. Who decide on the definition of cores? It was not defined when voting for in the Motion. FSC Canada has completed a science-based exercise to propose a definition and to develop a	Social and cultural considerations need to be included when defining cores. As the IFL concept is part of FSC-STD-60-004 V-1-1 shall be included an explanation note saying what “minimum influenced” means to allow the application and control of degradation levels in Brazil. ICL concept shall be better understood in order to be applicable and not contradictory with IFL concept in Brazil. If approved through standard development process needed, FSC shall clarify the indicators that should apply. Modification 1: Indigenous Cultural Landscape (given for information): [...] Modification 2: Core area of IFL: The portion of an Intact Forest Landscape* where intactness is maintained, that contains the most important ecological and cultural values and where timber harvesting and road building are generally not permitted	

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		clear methodology to identify core areas. More work is planned to develop methodology to identify social and cultural values (ICL). A definition of cores, if imposed internationally, could have significant impact on the proposed approach developed by FSC Canada and potential negatives or unintended consequences to on the ground practices. IFL concept: The concept of IFL itself is not easy to apply and need further detailing to allow implementation of protection measures in Brazil ...and ICL concept: what's the source? What's the level of discussion this concept was submitted to prior to turn an official FSC definition? Research: The ICL concept is totally new and is not part of motion 65, therefore should not be integrated within FSC normative framework without a clearly approval at General Assembly. Moreover, the ICL concept is not used in the advice. It is defined in "Terms &		

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		Definitions", but without reference across the advice.		
Background	5/Economic 1/National Office	Economic: The intent of this advice note isn't clear. It should be explained here. It seems to have two purposes: 1). Set expectations for CH and CBs interim to IFL indicators being drafted (to be clarified) 2). Set timelines for SDGs for the development of the IFL indicators. It is surprising to mention that "The FSC Board of Directors (BM 72.31, July 2016) has concluded that the Motion 65 default clause cannot be implemented as written in the motion, due to the significant undesired side effects in some of the most important countries for FSC" while not addressing this challenge in the Advice Note. The "Motion 65 default clause" would have precluded harvesting in the "core area of each IFL within the management unit" by the end of 2016. This Advice Note will preclude harvesting that degrade IFLs to the extent that it loses its IFL status by 3 months after January 2017. It is not	Economic: Add an explanation of the end goal of the notice. This could be: The purpose of this notice is to provide directives to certificate holders and certification bodies with the aim of ensuring minimal further destruction of IFLs interim to the development of clear indicators on IFLs and ICLs, and to disclose a final deadline for the finalization and implementation of IFL/ICL requirements. The whole Advice Note should be withdrawn and rewrite to come up with a proposal that does address the "significant undesired side effects" discussed by the FSC Board. For countries well engaged in the standard revision process of their FM standard, this advice must not apply. The only viable solution for IFL and ICL in Canada, rely in a balanced multi-chamber country adapted process addressing IFL/ICL for the country as a whole and not at the FMU level. If the Advice Note is intended to be a safeguard for IFLs, then it should apply to all countries, and in particular, in those countries where there is very few IFLs remaining.	We'll clarify the intent of the Advice Note in its next version

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		clear how this change of vernacular combined with a 3 months extension does anything to address the “significant undesired side effects” that are mentioned in the Background. We support the conclusion reached by the Board of FSC International at BM72 “that the Motion 65 default clause cannot be implemented as written in the motion”. National Office: This Advice Note has not adequately taken into account agreements reached during the IFL Solutions Forum in July 2016. It doesn’t consider any of the important objections and difficulties expressed.		
Advice				
	6/Economic 1/Environment National Office 1/Research	Economic: Clearly separate the notice in 2 sections would provide more clarity to the notice. Advice #1 should be re-written to direct action by CHs, not CBs. The Advice Note itself issued by FSC should	Economic: Advice directed to certificate holders and their certification body. For example, “Within 3 months of the effective date of this Advice Note, Certificate Holders must....” Add: “<i>Transition measures before the application of national indicators or by default</i>”	We’ll separate the Notice to two sections. First one targeted to all CHs and the second one to the SDGs in priority countries We’ll clarify what happens in case of non-compliance.

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		serve as notice This advice note does not address the “significant undesired side effects” mentioned by the FSC International BOD. In fact, the lack of flexibility of this Advice Note would make things more problematic and would generate even more detrimental side effects. Valid for the entire point 1.: It should be clarified that the measures described in point 1 are transition measures before national indicators or the IGI are in force. In general, it would be important to clarify what happens in case of non-compliance. FSC certified forest management based on RIL keeps the forests intact as defined by IFL in Brazil The absence of flexibility in the wording, lack of recognition of limitations to the certificate holders’ ‘sphere of influence’ and mis-alignment IGI 6.5 and with the ICL approach, make the Advice content unacceptable to us	<i>of IGLs</i>” as the title of this section. Add a paragraph on the outcome in case of non-compliance. Explain how the transition will take place from the requirements of this Advice Note to the Indicators of a revised and approved NFSS. Environment: “Operations (including harvesting and road building) that do not impact more than 20% of Intact Forest Landscapes may proceed if they do not reduce any IFLs below the 50,000 ha threshold. Global Forest Watch IFL maps must be used in all regions.” If this language is NOT used, we recommend the changes outlined below.	We’ll introduce the proposal to allow the commercial use of 20% of IFLs within the management unit

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		Environment: We strongly encourage FSC to create a very simple advice note that is straightforward and easy to implement. The foundation for this would be a cap on operations in IFLs to create a holding pattern, and limit operations in IFLs without preventing them altogether. We believe that this approach will give the majority of operators to continue with planned operations while indicators are being developed and implemented. If this approach is used, we recommend that the clauses below can be eliminated. Research: The advice does not clarify if the requirements described before Option 1 would be incorporated in FSC-STD-01-001 or in other standard, or if the requirements are going to be incorporated in the indicators only through Option 1 and 2, described in this document.		
1. By January 2017,	10/Economic	Economic:	Economic:	We'll describe what is

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
Certification Bodies shall send a notice to the Certificate Holders requiring them to maintain and/or enhance the intactness of IFL areas within the Management Unit, with minimal further destruction of IFLs. The notice shall require that:	1/Social 5/Environment 2/National Office 1/Research	This is unacceptable to some companies Specify if the requirements under point 1 will still be valid once a revised NFSS is approved and gets effective For CH to be able to send this notice, the interim IFL maps to be used should be clearly identified here. Can a map be included directly in this notice so there is no room for use of different sources? According the evaluation done in Brazil, the forest management implemented in certified areas is capable to keep forest landscapes managed with very similar characteristics to the untouched. Then, we can assume that the procedures defined in Brazilian legislation could be adopted as a possible way to maintain the IFL with their values (RIL, Reduced Impact Logging) Environment: In Brazil, Reduced	Explain how the transition will take place from the requirements of this Advice Note to the Indicators of a revised and approved NFSS. Define 'destruction' or use the term 'degradation' or 'alteration', where there is no land use change Define 'minimal' Environment Specify which human activities do not maintain and which human activities do not enhance the intactness of IFLs. National Office: The first step should be the development of an approach. 1. By January 2017, Certification Bodies shall send a notice to the Certificate Holders requiring them to maintain and/or enhance the intactness of IFL areas within the Management Unit, with minimal further destruction of IFLs. The notice shall require that: Research: 1. By January 2017, Certification Bodies shall	allowed, instead of what is prohibited in the next version of the Advice Note

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		Impact Logging practises has to be accepted Social: Supports Economic and Environmental chamber vision on RIL in Brazil National Office: If we are requiring to maintain and/or enhance intactness of IFL, an approach needs to be develop before. There is an issue to enhance the intactness of IFL areas, since silvicultural practices will impact intactness of the landscape.	send a notice to the Certificate Holders requiring that their forest management activities are aligned with the concepts of Reduced Impact Logging, maintaining the intactness of IFL areas within the Management Unit, with minimal further destruction of IFLs in an extent that does not compromise the forest management activities.	
1.1. No later than 3 months after receiving the notice, Certificate holders shall notify their CBs about any planned logging in IFLs over the next two years.	8/Economic 1/Social 10/Environment 2/National Office 1/Research	Economic: Not possible in Quebec, where Government makes the planning. It is clear that the end result of this advice note is that either new standards are created using IGIs or existing standards are modified to include IGIs as they relate to IFLs, and that CHs would be required to conform to those standards. But what is expected to happen in the interim?	Economic: The time needs to be extended to January 2018 Management plans should follow the RIL principles in Brazil, and any subsequent changes should strictly follow such concepts in order to keep the forest landscape protected with minimum changes. ... CBs shall require certificate holders to comply with the IFL safeguards. Failure to	This requirement appears to be technically impossible to be implemented in some cases. Therefore, we'll remove this from the next version of the Advice Note

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		#1 does not provide clarity on this. Questions to be answered: What is expected of CH once they've disclosed their planned logging in IFLs over the next two years? Also: What is expected of CBs? If CBs don't hear from them in three months, they get an NCR? Is it expected that CBs conduct an evaluation of whether or not their planned activities are in conformance? If so, based on what basis? The requirements under #1 are not detailed enough to make this assessment. In addition, given the timelines (e.g. maps developed by 12/31/17), the CH notice does not seem applicable without more clarity on "what IFLs" are to be considered by CH and CBs in the interim. Finally: Why two years? The two options proposed for SDG require new indicators to be applied within 1 year (Jan 2018). Whatever is required in 1.2 should be consistent with 1.1.	comply will result in Major Non Conformance Environment: No later than 3 months after receiving the notice, Certificate holders shall notify their CBs about any planned logging in IFLs over the next two years, using the "Intact Forest Landscapes. 2000/2013" maps accessed through Global Forest Watch (www.globalforestwatch.org) as a baseline Add: CBs shall require certificate holders to comply with the following safeguards. Failure to comply will result in Major Non Conformance Reports. (Note: The current draft doesn't outline any mechanism for enforcement) Clarify the conditions under which initially planned logging will be undertaken; In the case of modifications of planned logging operations, provide solution to integrate modifications of management plans in the legal framework In Brazil, Management plans should follow the RIL principles, and any subsequent changes should strictly follow such concepts in order to keep the forest landscape protected and little changed.	

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		This requirement is not applicable in all Provincial context in Canada as CH don't always have two years of forest management plan existing at every point in time. In some instances, harvesting blocks are attributed through auction sales – which sectors cannot be known in advance. Environment: Maps used must be globally consistent. Enforcement measures need to be made explicit Social: Supports Economic and Environmental chamber vision on RIL in Brazil National Office: Then what? Not clear what the CB should do after that and when and what they have to enforce. During the last IFL solutions forum, it has been discussed and almost agreed that operations could be pursued in 20% of the IFLs. The degradation of 20% of the IFLs within the Management Unit has been accepted by Greenpeace and UMD. As	National Office: Please clarify.	

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		suggested previously, we could draft a note precisising clearly what is intended here. Research: How can FSC expect that CHs are aware of the existence of IFLS within its FMUs? The publication of maps is expected to the end of 2017 and the implementation of IFL's indicators is expected to January 2017.		
1.1.1 Amendments to forest management plans, which increase logging in IFLs shall not be permitted.	6/Economic 1/Social 9/Environment	Economic: Not possible in Quebec, where Government makes the planning. For how long ? There may be conflict with provincial direction in Canada Does this mean increase logging above that which was originally planned ? Given that these seem to be measures for the transition, why is there a need to specify this? For the CB, the timeframe to make amendments to MP are much higher than this. This language is unacceptable for	Economic: "Amendments to forest management plans, which increase logging and road building in IFLs shall not be permitted while this advice note is in effect." Forest health loggings in critical hazard situations should be accepted (fires, pest and disease outbreaks) In Brazil, Reduced Impact Logging techniques (RIL) should be used and presented to the certifier as a means of guaranteeing IFL maintenance. An additional precautionary approach may be suggested by certifiers in relation to high-impact activities within areas previously identified as IFLs, such as road leases and infrastructures, while maintaining low impact exploration activities.	This requirement appears to be technically impossible to be implemented in some cases. Therefore, we'll remove this from the next version of the Advice Note

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		reasons noted above. IFLs are of different sizes, locations and contexts. Such an inflexible approach is unacceptable. How can such a requirement be guaranteed if there are questionings about the concept of IFL, and how the Organization, which has even less knowledge, can guarantee such a requirement? Considering that Certified Management areas don't damage the IFL forest cover, new certified projects or Expansions of certified projects underway has to be allowed in Brazil Social: Supports Economic and Environmental chamber vision on RIL in Brazil Environment: These additional safeguards are required to ensure that IFLs are intentionally high- graded.	Environment: Add: 1.1.2 Logging shall not be conducted in IFLs unless evidence is presented which proves that operations outside the IFL are not sufficient to meet short-term wood supply needs of certificate holders. 1.1.3 No construction of logging roads or tracks in IFLs will be permitted during the period this Advice Note applies. In Brazil, Reduced Impact Logging techniques (RIL) should be accepted	
1.1.2 No operations (including logging and road building) shall occur which degrade an IFL to	7/Economic 1/Social 10/Environment 2/ National Offices 1/Research	Economic: Not possible in Quebec, where Government makes the planning.	Economic: No operations (including logging and road building) shall occur which degrade an IFL to the extent that it loses its IFL status.	This requirement appears to be technically impossible to be implemented in some cases. Therefore, we'll remove this from the next

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
the extent that it loses its IFL status.		This goes beyond the ‘sphere of influence’, for CH or partner forest managers, which are not the land owner. Gov’t has decision authority on land use planning. Motion 65: Indicators will be defined at the national level for the protection of IFL. Therefore they will by opposition define what degrades an IFL. Clarify what is meant by “degrade IFL to the extent that it loses its IFL status» during the transition period. During the transition time, it was understood that logging can take place (which includes road building) during the second meeting of the IFL Solution Forum. In Brazil, Forest Management areas, certified by FSC, has to be out of the IFL restrictions because it was proved by the IFL maps, generated above forest cover (see PWA attached maps), that areas classified as IFL actually have been used for Forest Management, (producing wood) for more than 20 years. At the map is possible to confirm that the Certified	Compliance shall be verified by the CB prior to any logging activity being conducted in IFLs. Additional comment: to avoid increased costs to CH, this evaluation should be added to the scope of the regular surveillance audit to be planned in 2017 and 2018 (interim to the new/revised IFL indicators). Proposal: In case the Management Unit owns or is part of the PFI, general data regarding such areas and their protection measures must be publicly available. Define IFL degradation RIL based operations has to be accepted in Brazil Environment: 1.1.4 No operations (including logging and road building) shall occur which degrade an IFL to the extent that it loses its IFL status within the FMU or the broader landscape. Add: 1.1.5 Annual surveillance audits during this period will include an assessment of Principle 3. 1.1.6 Logging that occurs in IFLs will minimize impacts on biodiversity and forest ecology,	version of the Advice Note

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		FM protect the forest Social: Supports Economic and Environmental chamber vision on RIL in Brazil National Offices: If operations were already planned in this area, this may require modification of a management plan. Forest Management planning is a long and complex process in Canada which require a lot of steps, the respect of a long list of requirement and intensive consultations which may include specific agreements with stakeholders. The process only for an annual plan may take one year and any modification may require going back in the consultation process and changing agreements. This cannot be always done in a so short period of time. How an IFL loses its status? What's the metric? If remains in the IFL concept “..minimally influenced by human economic activity,” it shall be clarified what means minimally influenced. Environment: We could have the	and annual surveillance audits will during this period will include an assessment of Principle 9.3. 1.1.7 Volume from avoided IFL areas will be removed from sustainable harvest rates, and annual surveillance audits will be conducted on Principle 5.1 and 5.2. General data regarding IFL areas and their protection measures must be publicly available. Specify which operations degrade IFL to the extent that they lose their IFL status, and under which conditions logging degrades IFL to this extent. National Office Insert what exactly what could not be done to “loses its IFL status” Research: 1.1.2 Reduce Impact Logging techniques (RIL) should be used and presented to the certification body to ensure PFI maintenance. Certification bodies may suggest the implementation of additional precautionary approach in high-impact activities within areas previously identified as IFLs, such as roads and infrastructures, while maintaining low impact	

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		situation where the whole IFL doesn't lose its status but the IFL within an FMU does if we don't make this specification. Additional safeguards are needed to ensure that monitoring takes place during this period and that CHs don't intentionally increase harvest of IFLs for the purpose of having fewer restrictions once the Motion is implemented. It's necessary clarify the maps and information requested. In Brazil this information is not publicly disclosed (georeferenced) due to the risks of invasion, theft of wood, or other inappropriate use of such information. In addition, the scale of identification of IFL at the global level will often be inconsistent with the scale of identification of these areas at the level of the forest management unit	exploration activities.	
1.2. Certificate holders shall make publicly available the maps of their management units,	7/Economic 5/Environment 1/National Office 1/Research	Economic: As stated above, a requirement that an evaluation be conducted by the CB should be included in the notice, including a requirement for CBs to	Economic: "1.2. Certificate holders shall make publicly available the maps of their management units, of IFLs within these management units, and of	This requirement appears to be technically impossible to be implemented in some cases. Therefore, we'll remove this from the next

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
of IFLs within these management units, and of any planned logging in IFLs.		post publicly the report of that assessment, confirming these plans are in conformance. This requirement is not constructive. Its strict application would only “paint a target on the back” of every certificate holders planning to log in IFLs Until IFL mapping methodology and consultation on FSC Canada IFL/ICL indicators are finalized, we cannot confirm ‘IFL’ It cannot be that FSC FM certificate holders have no obligation to make maps available, and now those who are in IFL have to make maps publically available. What kind of maps? In Brazil many of this information is not publicly disclosed (georeferenced) due to the risks of invasion, theft of wood, or the inappropriate use of such information. In addition, the scale of identification of IFLs at the global level will often be inconsistent with the scale of identification of these areas at the	any planned logging in IFLs. CBs shall post public summaries of the evaluation conducted to confirm the status of the affected IFLs” Delete 1.2 and instead rely on public participation and stakeholder involvement required by the forest management standard. CH shall make publically publically available the maps (i.e. this can be to their Certification Body and to FSC for example) Environment: 1.2. Certificate holders shall make publicly available the maps of their management units, of IFLs within these management units, of annual harvest blocks, and of any planned logging in IFLs, using the “Intact Forest Landscapes. 2000/2013” maps accessed through Global Forest Watch (www.globalforestwatch.org) as a baseline. Add: 1.3.3 In countries that are scored below 50 in Transparency International’s corruption index, the requirements in 1.1 and 1.2 shall be verified by ASI. National Office: Clarify when this has to be completed. Is it the same action as point 1.4 of option 1 below? Is it for end of 2017?	version of the Advice Note

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		level of the forest management unit Environment: Consistency in maps is necessary. Concern that in some regions, IFLs will continue to be subject to status quo practices despite requirements. National Office: In order to make maps available, the IFL identification methodology should be completed and certificate holder will need to analyse their tenure and define IFL properly. It cannot be done with the high level satellite maps from GFW as the information is not precise enough and will land on expectations on areas that are perhaps not an IFL. Identification and mapping of IFLs requires social and cultural considerations, especially as it relates to Indigenous rights and interests. This needs to be included with more resources dedicated to understand ways that this can be completed. In some parts of Canada, it is the government which is responsible to plan management activities on public lands (90% of territory). Certificate holders do not have a lot of influence	1.2. Certificate holders shall make publicly available the of their management units, of IFLs within these management units, and of any planned logging in IFLs maps to FSC <u>and to its Certification Body.</u>	

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		on decision, including, timing (in term of speeding up the process) Not clear when this has to be completed. Is it the same action as point 1.4 of option 1 below? Is it for end of 2017? This requirement needs to be checked by Legal Unit I guess, since I don't know to which extent FSC is mandated to ask CHs to make economic intelligence public. There are also issues where concessions are privately owned (US...) You may have seen maps drafted by our Office (thanks to WWF-US funds) for each country, with these information (except roads planning for the next years) are available and we have signed a Data Secrecy with each Certificate Holder allowing us to use the maps and publish them. Research: The publication of maps is complicated in Brazil, because it can brings IFLs to the attention of ill-intentioned person, putting these areas in risk (invasions, theft of wood, or inappropriate use of		

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		such information).		
2. Standard Development Groups (SDGs) in Brazil, Canada, Congo Basin and Russia shall use the default generic IFL indicators (as presented in FSC-STD-60-004 V1-1) for the development of national indicators for the protection of IFLs.	8/Economic 5/Environment 2/National Offices	Economic: This is unclear. What the links and/or implications are between the requirements of #1 and #2 and this should be clarified. For example, as commented above, it is confusing to ask CH to disclose any planning in IFLs (1.1 of section 1) while the mapping of IFLs is not yet finalized (1.4 of section 2). Timelines (2 vs 1 year) are also confusing The IGI's can according to FSC procedures (for IFL or other indicators), be adapted to the National or Regional situation. Is this valid for the transition measures? The advice should be applied to all IFLs globally, for consistency and to address vulnerable areas outside the priority regions. Environment: Scope needs to be broadened. National Offices: FSC Canada has worked hard over the	Economic: Replace "use" by "adapt or adopt" and add "as per the options highlighted below" at the end Standard Development Groups (SDGs) <i>in countries where IFLs are present</i> shall use the ... Adopt FSC Canada's IFL/ICL indicators if Gov't supports. Timelines should allow sufficient time for FSC Canada to complete drafting, field testing and finalisation of IFL/ICL indicators. Environment: 2. Standard Development Groups (SDGs) in countries where IFLs are present shall use the default generic IFL indicators (as presented in FSC-STD-60-004 V1-1) for the development of national indicators for the protection of IFLs. National Offices: FSC needs to coordinate a process with Network Partners to explore compatibility of proposed approaches with the work (IGIs) coming from the HCV WG. There will be backlash if a top down approach of the IGIs is imposed on NPs Focus needs to be on coming to an agreement on work plan and timelines for countries with	This requirement seems to raise lots of confusion. The next version of IGIs is intended to help the SDGs similarly as the current version, so that the SDGs will have the possibility to adopt, adapt, or drop the IGIs. As the use of IGIs is described in full details in the Transfer Procedure, it is not necessary to repeat it in the Advice Note. We'll remove this clause from the next version.

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		last 2 years to develop indicators that make sense in our context. The IFL IGI indicators are not enough to allow proper indicator development for Brazil. The SDGs need to have the result of IFL Technical WG to clarify terms and definitions at least to ensure minimum consistency between global national standards.	significant IFLs. That will lead to the long term success for safeguarding IFL and ICL Standard Development Groups (SDGs) in Brazil, Canada, Congo Basin and Russia shall use the default generic IFL indicators (as presented in FSC-STD-60-004 V1-1) for the development of national indicators for the protection of IFLs <u>once finalized the work of IFL Technical Working Group and the results included on FSC-STD-60-004.</u> OR Standard Development Groups (SDGs) in Brazil, Canada, Congo Basin and Russia shall use the default generic IFL indicators (as presented in FSC-STD-60-004 V1-1) for the development of national indicators for the protection of IFLs. <u>The results of IFL Technical Working Group will generate a Guidance on how to develop national indicators and will be published till March 2017.</u>	
Option 1: Adapting the International Generic Indicators NOTE: Options 1 shall be implemented by SDGs as the default option	4/Economic	Economic: IFL indicators could not be defined and implemented before ICL is defined through proper engagement with FN. Any rushing of this process could only lead to failure and the additional potential adverse effect of losing the	Economic: There should be no short-cut of the NFSS transfer process for the sole purpose of implementing IFL indicators.	We'll try to relax the timelines to enable meaningful engagement with IP Adapting or dropping the IGIs is allowed according to

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		support of FN, a critical partner in the development of the FSC standards in Canada. It's not clear that "adapting" the IGI Indicators is allowed ("shall use the default IGI Indicators") even though it is clearly intended to be allowed under option 1, which is the default option.		the Transfer Procedure
1.1 By 31 January 2017, SDGs shall provide updated work plans with defined and timetabled deliverables for the process of developing IFL indicators, including: a) Description how the IFL indicator development process will be accelerated. b) Plans for engaging Indigenous Peoples (through FPIC).	7/Economic 1/Social 10/Environment 2/National Offices	Economic: 1.1 b) Engagement with indigenous peoples? Does the SDG need to do FPIC processes? If for each of the above questions the answer is yes, our positioning is contrary in Brazil, since the concept of Intact Indigenous Landscapes is not part of motion 65, just as there is no clearly defined concept, much less validated by FSC members. Another important point is that SDGs do not have capacity (since all its members are voluntary) another point of importance is that this type of cost is impracticable. We support this option, but there should be more time for this Environment: PIPC indicated that it would be finalizing work plans by the	Economic: Further explain how these "Plans for engaging Indigenous Peoples (through FPIC)" align with or add to FSC-PRO-60-006. Proposal for Brazil: 1.1.b A plan for engaging affected parties should be part of the SDG's development process of indicators (meetings, workshops, etc.) It is added to this justification that the current (and under review) Standards already define the processes of relationships with traditional communities and impacted indigenous peoples. Environment: b) Plans for engaging Indigenous Peoples (through FPIC). Where relevant, updated work plans with defined and timetabled deliverables for the incorporation of Indigenous Cultural Landscapes (ICLs) will also be finalized by 31 January 2017.	Engaging the Indigenous Peoples is necessary for addressing the points 3 and 8 of M65. The Advice to SDGs will be dropped out. We'll provide recommendation for this topic in the News Item

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		end of 2016 at the last IFL Solutions Forum. Important to integrate ICLs into this. Social: Supports Economic and Environmental chamber visions in Brazil National Office: We welcome a discussion around our workplan and timeline. FPIC is a concept to be used when you are delegating rights over resources and/or lands. In the case development of indicators FPIC do not apply for Brazil. Certification is voluntary. If an Organization would like to manage a Indigenous Peoples Land than FPIC would apply. Research: This deadline is unfeasible, because SDG would have less than a month to develop the work plan, taking into account that the effective date of this advice is January 2017. One month is a short deadline when we are talking about a teamwork, which demands	In Brazil, the processes of relationships with traditional communities and impacted indigenous peoples is already designed National Office: 1.1. b) Plans for engaging Indigenous Peoples (through FPIC through culturally appropriate engagement).	

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		engagement with indigenous people. Moreover, January is a month when the most person are on vacation. The deadlines must be more realistic. In addition, item b must be excluded because the concept of ICL is not part of motion 65 and the IGIs already demand engagement with traditional communities and impacted indigenous peoples.		
1.2 SDGs shall complete the transfer of national forest stewardship standard (NFSS) to P&C V5, or amend the existing NFSS with IFL indicators and submit the NFSS to PSU before 31 July 2017 for approval.	6/Economic 1/Social 9/Environment 2/National Offices 1/Research	Economic: The idea of accelerating the transfer of NFSS in the context of specific indicator could create a complex and problematic situation. It is not likely that by adopting such an Advice Note will suddenly accelerate the SDGs work to transfer the NFSS. It is as unlikely that SDGs will be comfortable adopting an NFSS that might address IFLs but not yet the full suite of other Indicators (including ICLs). As such, countries could end-up applying Option 2 while at the same time continuing the work on their transfer of NFSS to P&C V5. This would create a number of different NFSS to be apply in a short time period which would be confusing and prostrating.	Economic: There should be no short-cut of the NFSS transfer process for the sole purpose of implementing IFL indicators. Timeline until end 2017...or according to agreed work plan timetable Proposal for Brazil: change the date July 31, 2017 to "six months after publication of the indicators and supplementary materials coming from the International Working Group have been approved." Environment: 1.2 SDGs shall complete the transfer of national forest stewardship standard (NFSS) to P&C V5, or amend the existing NFSS with IFL indicators (and ICL indicators where relevant) and submit the	The Advice to SDGs will be dropped out. We'll provide recommendation for this topic in the News Item We are planning to handle RIL/Amazon in the next version of HCV Guideline, HCV2

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		It is proposed that the time-line is until end 2017. Seen the complexity of the IFL concept, the timeline is too short. This deadline should be extended to after the General Assembly for Brazil since this matter will be on the agenda. The International Working Group has not yet been able to bring partially accepted material for tropical forest management issues. Social: Supports Economic and Environmental chamber comments in Brazil Environment: See comment above. In Brazil, this deadline can't be achieved. It should be extended over the General Assembly since this matter will be on the agenda. So far, the indicators suggested by HCV TWG are not practical for the timber producers in tropical countries. National Office: The proposed approach developed for IFL and ICLs by FSC Canada will not be ready for this time. We would like to	NFFS to PSU before 31 July 2017 for approval. 1.2. Certificate holders shall make publicly available the maps of their management units, of IFLs within these management units, of annual harvest blocks, and of any planned logging in IFLs, using the "Intact Forest Landscapes. 2000/2013" maps accessed through Global Forest Watch (www.globalforestwatch.org) as a baseline. Add: 1.3.3 In countries that are scored below 50 in Transparency International's corruption index, the requirements in 1.1 and 1.2 shall be verified by ASI. For Brazil, the date 31 July 2017 should be postponed to "six months after the approval and publication of the IGIs for IFLs produced by the HCV TWG."	

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		explore developing staged requirements and coming to agreement with FSC IC on a work plan and timeline that will deliver successful outcomes. “... or amend the existing NFSS with IFL indicators” Does this mean that we (Russia) can take our recent NFSS, based on P&C V 4, and incorporate IFL indicators as required by M 65 there? If yes, what are the requirements for the national approval of such a “hybrid” NFSS? Are they the same as in 60-006? (two public consultations not less than 60 days each, consultative forum etc.), or are they easier? Shall we submit the whole standard for the consultations, or just indicators? And so on. I suppose that there shall be a set of rules for this option. And how will the requirements for the further transfer of this “hybrid” standard to P&C V 5 look like? The procedure, the time schedule, etc.? Research: FSC should review all deadlines, considering that the definition		

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		regarding IFL's future will only be taken at the FSC GA 2017.		
1.3 The approved NFSS shall be published by 01 October 2017 to become effective on 01 January 2018.	9/Economic 1/Social 4/Environment 2/National Office 1/Research	Economic: Idem, timeline until end 2018 This timing goes against the rules of transfer of standards approved and valid in the FSC system. Our reading is CH must be in conformance with the new/revised standard by Jan 2018. This leaves only 3 months to develop maps AND the launching of communications strategies (so it's clear what's required once communications are launched). This timeline seems very short. Perhaps the mapping of IFLs should be done as the 1st step in priority (to inform the process in section #1 for CH and CBs), then work can be done on how they will need to be taken into account. Environment: This proposal goes against all the rules of transfer of standards approved and valid in the FSC system, the transfer process provides for 1 year of adaptation period between standards, this time is	Economic: Timeline until end 2018...or according to agreed work plan timetable Proposal for Brazil: 1- Delete. Or 2- This will be effective on the field 1 year after the approval by the PSU of the standard this becomes valid in the field. Environment Proposal to (i) Delete or (ii) Maintain the deadlines already foreseen within the norms of transfer, that is, 1 year after the approval by the PSU of the standard this becomes valid in the field. National Office: Please clarify how to deal with ICLs. In the IFL Solutions Forum, some responsibilities were given to the PIPC to submit a work plan and a timeline. This should remain an important aspect. Modification: 1.3 The approved NFSS shall be published by 31 December 2017 to become effective on 01 September 2018.	The Advice to SDGs will be dropped out.

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		necessary, even more at this moment where the V5 standard has great changes and Which reflect significant changes in the field by the certificate holders. Such a deadline like presented is impracticable and will imply the loss of all certificates in the Brazilian Amazon. Social: Supports Economic and Environmental chamber comments in Brazil National Office: This Advice Note doesn't mention ICL. At the IFL Solution Forum in July, the PIPC made clear that they won't support IFL implementation before ICL has been determined as this concept of IFL may be conflicting with their rights and interests and with the ICL concept. During the Forum, it has been clearly stated that IFL cannot stand without ICL. So far, IGIs are not fully finalized, we don't have clear definitions on ICL and we are implementing highly complex processes across the Globe, quite different sometimes between key		

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		priorities region. Research: Two months (July to October 2017) seems to be an ambitious deadline to PSU evaluate NFSS of four countries. Furthermore, this schedule goes against the procedure to transfer the IGLs, which gives CHs and CBs one year of adaptation to the new NFSS.		
1.4 A communications plan shall be launched with all affected certificate holders in each country/sub-region, ensuring a dialogue on IFL areas that leads to clear maps being developed before the end of 2017 (maps shall be based on existing maps provided through Global Forest Watch, but with the flexibility to update to current situation in cases where new information is available).	6/Economic 4/Environment 1/National Office 1/Research	Economic: Mapping should not be based on GFW maps only, but on regionally adapted interpretation of IFL. It seems these maps will be different than the ones to be considered by CH holders in the interim (1.1 in section for CH and CBs) but it would be less confusing if they were the same, i.e. the mapping exercise required under section 2 should be done prior to requesting CH holder disclosing planned logging. It could reduce confusion to separate requirements on the mapping from the communication plan issue. The communication part of 1.4 should be transferred to 1.5 and it should be clarified specifically who will develop	Economic: Remove the sentence in parenthesis Time line according to agreed work plan timetable National Office: Communication plan needs to be defined in accordance with the workplan.	The Advice to SDGs will be dropped out. We'll provide recommendation for the communications plan in the News Item

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		and implement the communications plan (i.e. National Initiatives or PSU in the absence of Nis.) and who is responsible for developing maps. Environment: This should be a requirement for option 2 as well. National Office: Maybe possible but we are not in total harmony with the «data source of IFL» as written in the «Terms & definitions» section. Sensitivity of mapping and identification needs further discussion. But overall agree fully with need for a communication plan that is coordinated with FSC IC. Research: Would be more logical to extend the deadlines to launch the standards together with the maps, because the implementation of indicators depends on the maps. The publication of indicators in October and the maps only in December would create a useless gap.		
1.5 Communications shall be initiated with governments explaining	4/Economic 1/National Office	Economic: Who does this ?	Economic: Clarify the responsibility	We support the suggestion from the National Office to

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
the IFL process, what it aims to achieve and how it may impact on concession holders.		What is the communication approach if the IFL process conflicts with established government procedures for protected areas and/or with forest management requirements through the government-regulated FMP process? National Office: While not approved the IFL approach/indicators, the activities would focus on engaging governments on the discussion of importance of IFLs and the FSC standard development process. It's still not clear what a core zone means the level of management allowed on IFL. How the communication in the proposed way with Governments would occurs without causing panic? The engagement on standard development process would be more effective.	Communications with governments shall be initiated by FSC National offices explaining the National Forest Stewardship Standard development process and how IFL/ICL indicators are to be integrated into a final NFSS National Office: <u>1.5 During IFL indicators development, governments as a stakeholder shall be invited to take part of the consultation process. After approval of NFSS</u> communications shall be initiated with governments explaining the IFL process, what it aims to achieve and how it may impact on concession holders.	invite government representatives to participate the consultation process of the IFL indicators. We'll provide recommendation for this topic in the News Item
Option 2: Adopting the International Generic Indicators NOTE: Option 2 only applies when Network Partner or SDGs fail to implement Option 1.	4/Economic	Economic: "Option" is not really an option here OPTION 1 section 1.4 & 1.5 should be included in both Option 1 and 2. Communications plans will be necessary regardless of whether national/regional or international	Economic: Select other word for "Options 1 and 2" or drop Option 2	This part of the Advice Note will be dropped out, in order to provide sufficient time for the dialogue with the Indigenous Peoples

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		indicators are used. This option does not permit the development of a flexible and integrated approach that is necessary for the possibility of a pragmatic IFL/ICL outcome in the Canadian NFSS.		
2.1 For countries where national IFL indicators have not been submitted to PSU by the end of July 2017, the following shall apply:	3/Economic 1/Social 4/Environment	Economic: The date can not be fixed since the generic international indicators for IFL as well as their conceptual definitions are still in development and far from being approved. Environment: The date can not be fixed since the generic international indicators for IFL as well as their conceptual definitions are still in development and far from being approved by the Brazilians. Social: Supports Economic and Environmental chamber comments in Brazil	Economic: Proposal: replace "by the end of July 2017" with "six months after approval of material from the International Working Group on IFLs". Environment: Proposal for Brazil: replace "by the end of July 2017" with "six months after approval of material from the international HCV TWG".	This part of the Advice Note will be dropped out, in order to provide sufficient time for the dialogue with the Indigenous Peoples
2.2 The Network Partner or SDG shall incorporate the default generic IFL indicators (as presented in FSC-STD-60-004 V1-1) into the existing NFSS.	1/Economic	Economic: The FSC-STD-60-004 V1-1 is not adopted. FSC International website indicate that "First consultation is now closed. We are currently assessing	Economic: To be clear, the Advice Note should re-state any language it needs to refer from a Draft standard or indicate whether or not the draft or the final version will apply.	This part of the Advice Note will be dropped out, in order to provide sufficient time for the dialogue with the

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		feedback." It does appear contradictory to both be consulting on indicators and applying them while draft in an advice note. It is also unclear whether these indicators should be used as currently drafted (moreover the draft document is no more accessible) or if the final version will be the one to be implemented.		Indigenous Peoples
2.3 The revised NFSS shall be submitted to PSU for approval by the end of July 2017.	4/Economic 1/Social 4/Environment	Economic: The dates cannot be fixed since the generic international indicators and definitions are still under development and far from being approved. Environment: The date can not be fixed since the generic international indicators for IFL as well as their conceptual definitions are still in development and far from being approved by the Brazilians. Social: Supports Economic and Environmental chamber comments in Brazil	Economic: There should be no short-cut of the NFSS transfer process for the sole purpose of implementing IFL indicators. Proposal for Brazil: replace "by the end of July 2017" with "six months after approval of material from the International Working Group on IFLs". Environment: Proposal for Brazil: replace "by the end of July 2017" with "six months after approval of material from the international HCV TWG".	This part of the Advice Note will be dropped out, in order to provide sufficient time for the dialogue with the Indigenous Peoples
2.4 The approved NFSS shall be published by 01 October 2017 to become effective on 01 January 2018.	2/ Economic 1/ Social 4/Environment	Economic: More time is necessary, even more at this moment where the V5 standard has great changes and reflects	Economic: Proposal for Brazil: 1- Delete. 2- Or 2 - to maintain the deadlines	This part of the Advice Note will be dropped out, in order to provide sufficient time for the

Reference	Number of comments received from chambers	Key message	Proposed change	PSU response
		significant changes in the field Such a deadline is impracticable This timeline is not consistent with the standard and procedures that surround the transfer or development of NFSS. Environment: This proposal goes against all the rules of transfer of standards approved and valid in the FSC system, the transfer process provides for 1 year of adaptation period between standards, this time is necessary, even more at this moment where the V5 standard has great changes and Which reflect significant changes in the field by the certificate holders. Such a deadline like presented is impracticable and will imply the loss of all certificates in the Brazilian Amazon. Social: Supports Economic and Environmental chamber comments in Brazil	already foreseen within the norms of transfer, that is, 1 year after the approval by the PSU of the standard this becomes valid in the field. Environment Proposal to (i) Delete or (ii) Maintain the deadlines already foreseen within the norms of transfer, that is, 1 year after the approval by the PSU of the standard this becomes valid in the field.	dialogue with the Indigenous Peoples

Additional question:		Suggestions for additional safeguards	PSU response
----------------------	--	---------------------------------------	--------------

FSC secretariat is looking for additional safeguards to limit logging in IFLs in 2017 and 2018. Do you have suggestions for such ?	3/Economic 1/Social 7/Environment 2/National Offices	Economic: <u>The Ministry of Forests, Wildlife and Parks</u> of Quebec supports forest companies in the province who wish to get forest certification. In accordance with this objective, we want to measure the impact the transitional measures proposed by the FSC (Motion 65) will have on existing certificates. To carry out this analysis, we must firstly update the intact forest landscapes (IFL) layer produced by the Global Forest Watch in 2013. We also need to validate the IFL sectors that have been identified since they were generated from satellite imagery. These operations require to manage a lot of data and take time. Furthermore, FSC Canada publishes today a guide for the implementation of the IFL concept in Canada. Given the importance of this issue, you will understand that we prefer to complete our analysis and take into account all available information before sharing any comments with FSC International. Therefore, you will receive our conclusions by the end of December 2016, if relevant. It is troubling that FSC Secretariat is looking for additional safeguards to limit logging in IFLs while the Board of directors has mandated the Secretariat to avoid “the significant undesired side effects in some of the most important countries for FSC”. As written, this Advice Note might not even prevent those “significant undesired effects” to happen. This issue should be first managed at the country level and not at the management unit level. If a country already has most of its IFL outside the reach of forest management activities, it should suffice to meet the intent of protecting IFL. Additional indicators should be developed in a very short timeframe for restoring IFL in countries with few IFL left to demonstrate that IFL is a new emerging value in the FSC world and to ensure some fairness. Consistent with recommendations from the IFL Solutions Forum, FSC personnel should develop an engagement strategy with Canadian provincial agencies with land use planning jurisdiction. Many areas that today in Canada appear as ‘IFLs are the result of land use planning processes and decisions made by provincial agencies. Going forward, for IFLs that are not protected, the CH is not in control of this outcome and can only make recommendations to land use planning authorities. Government	These aspects will be taken into considerations when formulating the Agendas for the next IFL Solutions Forum meetings
---	---	--	---

		agencies may act to implement an IFL protection recommendation, reject it, accept a temporary deferral, confirm existing allocation of the land for forest management, re-allocate the land or other purpose consistent with the public interest. First Nations will be consulted by government in these processes. Agree in certain circumstances and regions that 'logging' in IFL has no impact on the integrity, intactness and biodiversity of the forest. Allowing SFM (Sustainable Forest Management) will attain the objective that FSC strives for: • to maintain the tropical forest and avoid conversion to other land-uses; • to see IFL in its wider landscape context: protected areas which could be increased and SFM in the surrounding area, where for ex. In the tropical forests, there is no impact on connectivity, wildlife is well protected and forests are maintained under FSC certified, SFM; Interpret IFL in its wider context, use a scientific basis for implementing the concept, based on scientific information of degradation, un-sustainable management and fragmentation, and not on satellite images of roads only. The position to IFL core areas must come up with a clear road map: are certificate holders allowed to harvest or not within Core Areas during this transition period? What about those who have started harvesting within those areas with respect to their ongoing Management Plans? Are they losing their certificates? Are certified companies being allocated the possibility to identify their IFL core areas during their planning? If those questions can be answered, than we can assess as well the need to add further safeguards. Brazil: Very concerned with potential problems in tropical forests the fact that opinions are not been heard by the Working Group or FSC himself. Brazil: Voices from the field claims that if this concept is applied how it is FSC will not have any certified forest management operations in tropical forests. This this will be a huge loss for all. A forest without economic value will turn into non-forest use.	
--	--	---	--

		Brazil: The adoption of the IFL operations restrictions on FSC Forest Management certified areas is an indirect assumption that FSC certification has no effectiveness, despite all technical information be demonstrating the opposite. Brazil: It's important to clarify that if the IFL will be adopted, the FSC will loss all FM companies in Amazonia, opening space to the illegal wood. The IFL model doesn't works to the serious Amazonian Companies. Environment: We have integrated safeguards throughout the text of the Advice, see above. In Brazil, we understand the pressure and the demands from members to apply this motion, but we are also very worried about the potential problems the motion may result to the certification of tropical forests. We have the feeling that our concerns are not listened by the HCV Technical Working Group. You all need to be aware that if this concept will be applied in its original form, there will be no longer FSC certified forest management in the tropics. This would be a big loss, because the forest that do not have economic value turns into other non-forests uses. In Brasil we only have 10 forests management units certified, because we are struggling with the illegal logging. If FSC creates more problems to the certified companies, which are already in the brink of economic feasibility, they may be lost for good. It is more than a technical problem, it is a political issue for us, and we think that FSC IC and others are not listening us. Our system (FSC system) have been already question in our country, because of other mistakes form FSC IC. Social: Supports Economic and Environmental chamber comments in Brazil National Offices: FSC Canada would like to work with our stakeholders to negotiate a solution and agree on potential safeguards for Canada. An example in Canada could be the implementation of the caribou indicator..... FSC would advice the use of Reduced Impact Logging on IFL until IFL indicator approval at national level together with clear guidance on what "core areas*" means. Most important is to be clear is if core area is within management unit or at landscape	
--	--	---	--

		level. If core area could be better explained, FSC would include a recommendation for certificate holders that timber harvesting and road building are not permitted inside IFL core areas within the management unit saying also the minimum % of core area that should be defined by the CH taking into consideration landscape level and management plan. * Core areas: The portion of an Intact Forest Landscape* where intactness is maintained, that contains the most important ecological and cultural values and where timber harvesting and road building are generally not permitted. (FSC-STD-60-004 V1-0 EN INTERNATIONAL GENERIC INDICATORS) My thoughts around how could be shaped the next Advice Note, allowing key regions to pursue the initiated work: According to me, FSC should act as a facilitator to insure that IFL debate is consequently connected to: - Key areas for conservations (not only for forest stands: endangered species, sensible biotopes...); - Human footprints and its prospective with the land-use plans being developed by WRI across the Globe; - Indigenous and local communities territories; - Key ecological corridors that should be maintained for the humankind (network of protected areas and FSC certified concessions). We didn't start properly the dialogue with governments by lack of human resources and of money. Inviting governments for a roundtable is extremely costly and time-consuming. This dialogue will be highly difficult but needed, of course. I already know that reviewing a management plan because of the Motion 65 would be something almost impossible in a time frame inferior to 05 years, because we are not parliamentarians and even if FSC is changing the paradigms of the forestry sector for 20 years, we need time and means to achieve our mission. The indicator 1.5 is key in the process, and this would require a real brainstorm between Regional Offices, PSU and Director's Office to see how we could be relevant and efficient here. FSC Congo Basin Office is committed to implement the Advice Note and FSC policies but we enter in a new phase here, after the already commonly accepted HCV management.	
--	--	---	--

		I would also allow myself to ask that the next version of the Advice Note be more clear in terms of what is prohibited and what is accepted until a new NFSS enters into force. This is highly sensitive but needs to be discussed by our peers and across the chamber.	
--	--	--	--