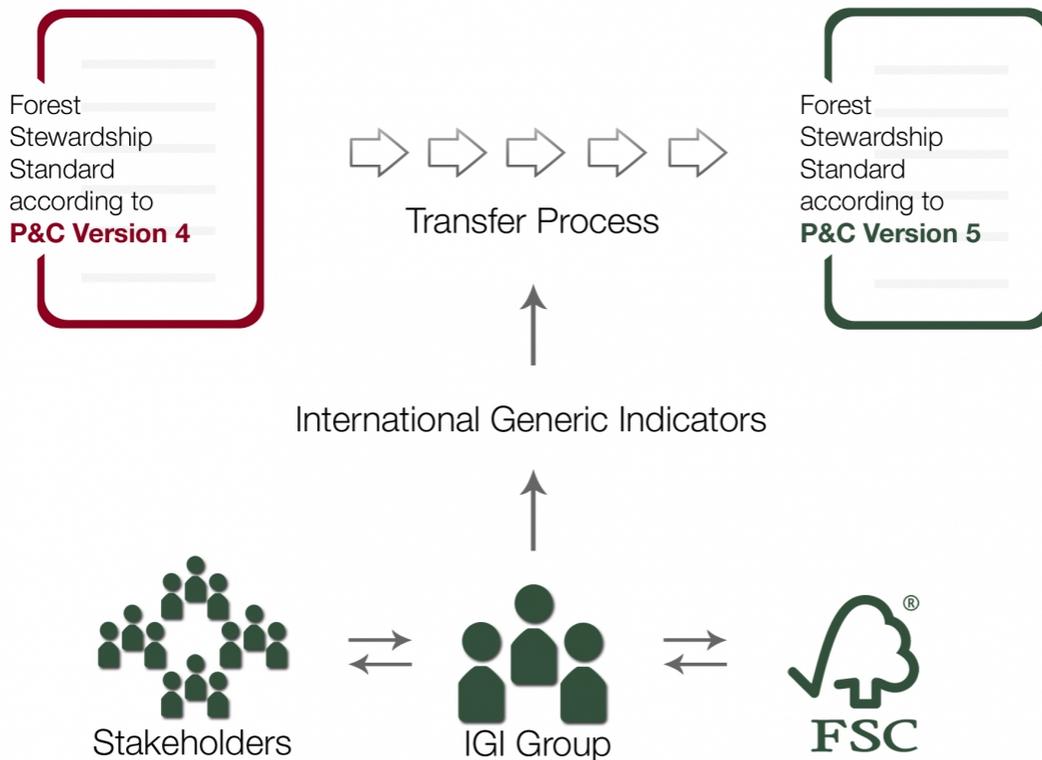


Forest Management Advisory Committee Brief on MDNR Comments on First and Second drafts of FSC International Generic Indicators (IGIs)

Michigan Department of Natural Resources, Forest Resources Division
January 7, 2015



Background:

- The Principles and Criteria Version 5 (P&C V5) were approved in February 2012.
- The Forest Stewardship Standards in each country must now be transferred to the P&C V5.
- To phase in use of the P&C V5 in a consistent way across the world, FSC is developing a set of IGIs.
- As countries revise and transfer their existing indicators, use of the IGIs will ensure that they meet all the requirements set out in P&C V5.
- This will support a faster and more efficient approval process for the National Forest Stewardship Standards.
- Goal is increased global consistency – and credibility – for the FSC system.

Overview of MI DNR Comments on First Draft of IGIs – April 30, 2013

1. Many International Generic Indicators are onerous to comply with, overly prescriptive, inflexible, and in some instances are poorly worded, non-achievable, or un-auditable.
2. There is a significant amount of redundancy in the IGIs and the number of indicators can be greatly reduced.
3. Many indicators also appear to exceed the scope of the associated criterion.
4. In many instances the IGIs seem to focus more on social engineering as opposed to ensuring sustainable management of the forests and an appropriate level of community engagement.
5. The IGIs would be very difficult to adapt to forest management standards, due to the sheer number, complexity and overly-prescriptiveness of the IGIs.
6. The additional complexity and prescriptiveness of the IGIs would add substantial cost to certificate holders, with little to no additional benefit to these holders in the U.S., Canada and Europe. The easiest path for many certificate holders might be to simply drop FSC certification rather than to incur the greater burden for conformance.
7. While many IGIs may be necessary for other areas in the world, they are not necessary in the U.S. where there is a strong and established legal system and regulatory foundation for addressing and upholding social rights and environmental standards.
8. It may not be possible to craft a single set of IGIs that can be equally applied in countries with strong rule of law and regulatory foundation and in those countries that do not.
9. FSC International should consider establishing a set of core IGIs for all countries, and an additional set of National Generic Indicators to be utilized by participants located in areas lacking a FSC approved national standard.
10. There needs to be national flexibility in the use of IGI for writing national standards, including:
 - a. Excluding IGIs that are relevant and important in the global context but not valuable in the U.S. context (covered by a regulatory foundation); and
 - b. Modifying other IGIs to better fit national needs and circumstances.

Overview of MI DNR Comments on Second Draft of IGIs – March 31, 2014

1. There are still many instances of IGI being recognized as necessary for use as a normative international standard, but where there are specific concerns regarding applicability in the United States.
2. It would be useful and expedient to develop two separate and different standards, one to serve as an international normative standard and one to establish requirements for the transfer to existing or new national standards.
3. The proposed indicators are much less focused upon the practical concepts of sustainable forestry management and practices, and instead are overtly promoting an agenda of social engineering. While this might be necessary for areas of the world where no national standard is in effect or there is less effective rule of law, it is not necessary for nationalities with well-established and effective rule of law and existing national standards. Having two separate standards (as suggested above) would alleviate this tension.
4. Many indicators from the first draft have been moved to an extensive body of notes. The scope section of the standard does not provide any specific intent as to the normative nature of the notes, which are presumed to be normative given the language that was used (to wit: 'Standards Developers shall ...').
5. The extensive use of normative notes simply defers difficult decisions regarding the utility, applicability, and necessity of the notes (former indicators), and places a tremendous burden upon national standards developers.
6. The applicability of notes in a national context can ultimately be resolved if the proposed transfer procedure is approved and retains the national discretion to adopt, adapt, drop, and add indicators (Development and Transfer of National Forest Stewardship Standards to the FSC Principles and Criteria Version 5 (FSC-PRO-XX-XXX V1-0 EN)).
7. When the word 'workers' is used in an indicator, a distinction needs to be made between employees of the organization and other contracted workers. Subject to contract terms, there is often limited or no ability for an organization to influence or collect data on contracted workers, specifically in regard to collection of monitoring data for payment of wages or exposure to pesticides.

Current Status of the IGI Process

- Original timeline was to have new IGI approved by the FSC Board of Directors in June of 2014 – this did not occur.
- Current published timeline:



- Final draft IGIs have been developed and approved by the IGI Working Group.
- Final stakeholder review began on December 5, 2014, with feedback due by January 18, 2015. Looking for 'high level feedback' exclusively through an on-line survey.
- IGIs will be submitted to the FSC Board of Directors for approval. Proposed approval date is in March of 2015.
- Approval of IGI Transfer Procedure also targeted for March 2015. Key provisions for transfer of IGIs:
 - Adopt an IGI into national standard
 - Adapt an IGI into a national context
 - Drop an IGI that is non-contributing in a national context
 - Add and new indicator for conformance to a criterion in a national context
- Transfer of the 2010 FSC-US Forest Management Standard will begin in Q1 2015. First draft targeted for Q4 2015. Board approval targeted for Q3 2016. FSC-US objectives:
 - System consistency
 - Opportunity for limited and targeted changes
 - Driven by stakeholder (certificate holder) proposals
- 2010 FSC-US Forest Management Standard extended in effect until new a standard is approved for use starting in 2017.