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## 11/2025 STRENGTHEN THE MEMBERSHIP IN FSC TO STRENGTHEN THE FSC SYSTEM

Edited | Policy Motion

|                                  | Proposed By                        | Seconded By        | Seconded By                           |
|----------------------------------|------------------------------------|--------------------|---------------------------------------|
| <b>Name</b>                      | Carla Ximena Cárdenas Monroy       | Chris van der Goot | Alonso Martín Gonzales Asencios       |
| <b>Organization / Individual</b> | Cárdenas Monroy, Carla Ximena, Ms. | Ecohout Foundation | Gonzales Asencios, Alonso Martín, Mr. |
| <b>Chamber / Subchamber</b>      | Environmental / South              | Social / North     | Economic / South                      |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

FSC, in no more than one year, shall conduct a study whose goal is to inform a strategy to strengthen and grow FSC's membership. The study shall seek to determine: i) why former FSC members dropped their membership and what would give them reason to rejoin; ii) what are the limitations for individual members and youth to participate actively; iii) what are the causes to don't grow membership in the global south; iv) what are the structural problems in FSC's Secretariat (budget, strategy, role of the network, etc) that need to be corrected.

It will also survey organizations or individuals who are identified as good prospects for membership, as determined through outreach to FSC offices (national, regional, and sub-regional) and selected members. The study shall include countries in both the global north and south and shall target members of all three chambers. The sample size must be sufficient to draw solid conclusions about the reasons members leave or might (re)join.

Having completed the study, FSC shall draft the strategy to strengthen and grow the membership and consult it with members prior to finalizing it. The strategy shall define concrete measures and activities and shall set a budget and timeline for their implementation. It must address the problems that are identified in the Background/Rationale section of this motion. It should consider, *inter alia*:

- Adjustments to FSC statutes

- Adjustments to the governance of the Secretariat
- Adjustments to the structure of the FSC network and the lack of network models without membership power, especially in the global south.
- Strategies to attract young people as members of FSC
- Strategies to improve individual members' participation in membership activities, the Board of Directors, Working Groups, and other spaces in the FSC system.

### **Background Information and Key Documents:**

This motion aims to encourage strong participation from the membership, both in terms of quantity and quality. FSC is an organization of members who hold the highest decision-making power in the Assembly. For over 25 years, the Assembly has led the organization by maintaining a unique balance between the three chambers and between the Global North and South.

These decisions must continue being informed, participative, and equilibrated. For that a strong participation and balance in the capacity to take decisions is needed.

Enhanced membership participation will help the Board of Directors and the Secretary in their work and help ensure the system's consistency and credibility.

Over the last few years, FSC has faced several problems related to the number of members and quality of participation, as it is detailed below:

#### **1. Power imbalance**

Organizational membership is unbalanced in the environmental and social chamber, especially in the global south. As the power of votes of the organizational members is heavier, the actual composition of the membership leaves the environmental and social chamber- especially in the south- with less power to make decisions. Data that has been provided by the Secretariat in January of 2025 demonstrates this reality as follows:

- **Environmental chamber:**

There are 212 individual members and 105 organizational members; in the environmental south chamber, 117 individual members and only 39 organizational members; in the environmental north, 35 individual members and 66 organizational members.

- **Economic Chamber:**

There are 224 individual members and 281 organizational members; in the Economic North chamber, there are 52 individual members and 228 organizational members; in the Economic South chamber, there are 172 individual members and 153 organizational members.

- **Social Chamber:**

There are 147 individual members and 109 organizational members. Global North has 104 individual members and 61 organizational members; in the Global South, 43 individual members and 48 organizational members.

## 2. Losing members and interest, specially from the global south

In 2021, 2022, 2023, and 2024, 95 members of the environmental chamber, the majority from the global south (71) withdrew their membership being 22 of them organizational members (13 organizations from the global north and 9 organizations from the south).

In the same four years, 62 members of the social chamber, the majority from the global south (46), withdrew their membership being 26 of them organizational members (11 organizations from the global north and 15 organizations from the global south).

Evidently, over the last years, the environmental and social chamber's participation in international and regional meetings has been weak, especially in the south. There is a lack of interest in participating in meetings and activities of FSC which has been noticed and highlighted on those meetings by members.

## 3. Democracy problems

For the 2021, 2023, and the exceptional election in 2023 (to replace a resigned member), only one unique candidate from the environmental chamber was presented to the International Board elections, affecting the democracy in the system. It is related to the withdrawal of members of the environmental chamber suffered in the same years.

#### **4. Lack of young members participation**

FSC does not have significant number of young members participating in the system, neither in elections for the Board nor Working Groups. This puts FSC in a position of deficiency of innovation and inclusion of cutting edge initiatives in the system.

#### **5. Grown of country models without membership power to take decisions**

19 non-members Network models (National representatives or staff) have been installed to cover operations in 36 countries, mostly in South America, Africa, Asia, and Latin America or the global south. There are no concrete plans to become those models on National Offices/Network Partners in order to be governed by members.

#### **6. Unclear functions in the FSC personnel and Network Partners' officers**

It is unclear whether the staff, Regional Directors, and the Network Partners' staff are mandated to increase and strengthen the membership. This should be an inherent function of those roles hired by FSC or by the Network Partners.

#### **7. Challenges for individual members**

Individual membership presents several challenges to participation, for example, lack of access to financing, lack of training and support; also, time constraints because of their jobs.

There are no differentiated ways to compensate individual members in Working Groups, in the Board of Directors and in other roles where they participate. Neither there is targeted support to help them to manage their challenges.

#### **8. Lack of engagement's members strategy, budget and training**

There is no engagement strategy or clear methods to enhance membership participation in discussions of topics of interest, regions, specific policies or documents where strong participation is needed.

There is not a training program for new members or existing members that can actualize them in FSC evolution.

The membership does not know about a specific budget for engagement and strength member participation.

In light of that, a strategy to strengthen FSC membership is urgently required.

[Data members 2024.pdf](#)

[11-2025\\_Strengthen\\_the\\_FSC\\_membership\\_to\\_strengthen\\_the\\_FSC\\_system\\_V1\\_20250313124900.pdf](#)

[11-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[11-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[11-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**11/2025** Strengthen the membership in FSC to strengthen the FSC system

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

**1 ENVISAGED OUTCOME AND DELIVERABLES**

**1.1 Stated or Assumed Outcome**

- A stronger and more inclusive FSC membership base that enhances the overall effectiveness, legitimacy, and sustainability of the FSC system.

**1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- FSC must complete and share a final membership strengthening and growth strategy, developed through a comprehensive membership study conducted within one year.

**2 FSC GLOBAL STRATEGY 2021-2026**

**2.1 Link to Global Strategy**

- Not provided.

**2.2 Contribution to Global Strategy**

- The motion contributes to Goal 1.1 (Engage members and stakeholders to drive change as a community): By reinforcing shared behavioral standards, the motion strengthens FSC's identity as a value-driven, co-creative membership community.

**3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion is clear in purpose and reasonably specific overall. It clearly requires FSC to complete, within one year, a study and a member-consulted strategy to strengthen and grow its membership.
- The motion identifies specific areas of inquiry (e.g., reasons for member loss, youth participation, Global South challenges, Secretariat structure) and requires coverage across all chambers and both hemispheres (Global North and South).
- The motion requires that the draft strategy be consulted with members before finalization, ensuring transparency and participation.
- The motion says "FSC shall..." but does not specify who within FSC is responsible, e.g. Secretariat, Board, Membership Unit or external consultants.
- The motion says "sample size must be sufficient," but it does not define what "sufficient" means or provide methodological guidance, e.g. quantitative vs. qualitative, survey vs. interviews.
- The motion does not state who approves the final strategy, the Board, the Membership Unit, or another body to formally close the motion.

## 4 FEASIBILITY OF IMPLEMENTATION

### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☒ 6 months – 1 year
- ☐ 1 – 3 years
- ☐ More than 3 years

### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.4 (Pre)conditions for implementation

- To implement the motion effectively, FSC must first establish clear leadership, an approved ToR and budget, a sound methodology, and a structured stakeholder engagement and reporting plan.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- A larger, more engaged, and more balanced membership.
- A stronger and more accountable organizational structure, and renewed trust and legitimacy in FSC's global governance system.
- More opportunities for engagement and leadership.
- Risk of consultation fatigue with extensive surveys and consultations may overburden members, national offices, and staff.
- Unrealistic expectations of rapid reforms or growth following the study, but implementation could take longer, leading to frustration or loss of trust.

### 5.2 Synergies with work underway:

- The FSC Network Policy was approved in 2021 after consultation with the membership. The Policy recognizes the need for bottom-up, balanced local engagement, from an active and representative group in society, as a core part of FSC's way of delivering on our mission.
- Membership Development: Three Regional Membership Managers are appointed and are responsible for executing a comprehensive membership development strategy within their designated regions. This will entail systematically identifying gaps in chamber and

geographic representation, recruiting new members whose values and activities align with the mission of FSC, and ensuring the retention of existing members through high-quality, strategic engagement. Their responsibilities will also include the development and implementation of tailored outreach and service initiatives aimed at expanding and diversifying the membership base, thereby fostering broader and more inclusive participation across all chambers.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- Statutory Motion 03/2025 “Criteria and bases for Protocol to assign new members to the FSC Social, Economic and Environmental Chambers”.

### 6.2 Alternative 1

#### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

- n/a

## 7 IN A NUTSHELL

Within one year, FSC must carry out a global study to understand why its membership is not growing and why members leave, and then use the findings to develop a concrete, member-consulted strategy to strengthen and expand its membership.

- The study will look at:
  - Why former members left and what would bring them back,
  - Barriers to participation for individuals and youth,
  - Causes of weak growth in the Global South, and
  - Internal structural problems within the FSC Secretariat and network.

The resulting strategy must propose specific actions, budget, and timeline, and may include governance and structural reforms to make FSC more inclusive, representative, and attractive to current and future members.

The motion’s proposal may face challenges related to the short one-year timeline for completing a complex, global study, as well as difficulties in obtaining reliable data and ensuring balanced participation from all chambers and regions. Coordination across a diverse network, possible resistance to governance or structural reforms, and the risk of consultation fatigue could further complicate implementation. Budget constraints, cultural and regional differences, and unrealistic member expectations may also hinder progress, while weak follow-through after the study could limit the motion’s long-term impact.

### 7.1 Key open questions

- What defines success in resolving the membership gaps?
- How will member input be included and sustained?
- How will progress and accountability be monitored?

- Who leads, how it's done, with what resources, how members are engaged, and how success is verified?

**12/2025 MOTION TO STRENGTHEN CROSS CHAMBER COLLABORATION DURING FSC GAS**

Accepted by MC | Policy Motion

|                                  | Proposed By           | Seconded By      | Seconded By                          |
|----------------------------------|-----------------------|------------------|--------------------------------------|
| <b>Name</b>                      | Jens Holm Kanstrup    | Alan Smith       | Peter Kofod Kristensen               |
| <b>Organization / Individual</b> | Forest of the world   | Smith, Alan, Dr. | Ørsted Bioenergy & Thermal Power A/S |
| <b>Chamber / Subchamber</b>      | Environmental / North | Social / North   | Economic / North                     |

**Policy Motion (Motion text / High-level action request):**

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

The membership asks the BoD and secretariat to ensure enough time and space for chamber and cross chamber discussions and negotiations during GA's, including the opportunity to negotiate already submitted motions if they are prioritized by the chambers.

**Background Information and Key Documents:**

Chamber and cross chamber discussions and negotiations are considered a core value of FSC by the membership and the main reason why members travel and spend time on GA participation.

Due to first covid and the implementation of hybrid GA participation (either participation by physical presence or via video link) the Secretariat have been struggling to find a GA procedure that fits this purpose, and unfortunately we saw the problems and consequences arising during the last GA, where motions were not supposed to be negotiated, as they otherwise always have been until the Bali GA, but because some motions were considered crucial for the consensus on priority issues, some motions were opened for negotiation while others were not.

At the same time the time designated for chamber and especially cross chamber discussions and negotiations were very limited so it was difficult to engage the chambers to lobby in favour or against motions of interest, severely limiting the democratic process at the GA itself, which always have been

the hallmark of FSC, AND the reason why members spend their time and money participating in the GAs.

### **Pros and cons**

The advantages of giving higher priority to the democratic process around motions and the decision-making process during GA's are obvious as per the explanation above, engagement, cross chamber consensus and understanding and ownership to decisions made.

The challenges are that the members travelling to be present in-person will have better opportunities to engage and influence decisions, thus it could be argued that members participating online will have less influence. However, FSC is currently in an engagement crisis and not allowing space for the membership to engage in negotiation of motions at the GA's will add fuel to that fire, and we need to find a way to bring the positive sides of both physical presence and online participation together in a meaningful way.

Another challenge is more practical but nonetheless important, and that is the strain and workload on FSC staff and translators hired to translate the amended motions into now three official languages of the FSC.

The latter will also likely increase the cost of translation, although by exploiting the global network placed in all time zones, it should be possible to find solutions to both challenges.

[12-2025-Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[12-2025\\_Final\\_Feasibility Assessment\\_SPA.pdf](#)

[12-2025\\_Final\\_Feasibility Assessment\\_FRA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**12/2025** Motion to strengthen cross chamber collaboration during FSC GA's

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

**1 ENVISAGED OUTCOME AND DELIVERABLES**

**1.1 Stated or Assumed Outcome**

- Institutionalize structured and flexible deliberation time during GAs, particularly for motions of importance to the chambers.

**1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- Allocated time blocks for chamber and cross-chamber discussions and negotiations.
- A mechanism for reopening or negotiating already submitted motions when prioritized by the chambers.
- Coordination by the BoD and the secretariat to implement these changes in future GAs.

**2 FSC GLOBAL STRATEGY 2021-2026**

**2.1 Link to Global Strategy**

- Not provided

**2.2 Contribution to Global Strategy**

- The motion does not directly contribute to a specific goal. Some contribution could be claimed towards Goal 1.1 “Engage members and stakeholders to drive change as a community for co-creation of solutions”

**3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion is very clear and concise in its request, while not being overly specific about how exactly relevant discussion time and negotiation space should be identified at future General Assemblies.
- It is further remarkable that the motion proposer discusses in the Background the pros and cons of the motion in consideration also of potential negative impacts.

**4 FEASIBILITY OF IMPLEMENTATION**

**4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months  
☐ 6 months – 1 year  
☒ 1 – 3 years  
☐ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

- Chamber Prioritization Process: clear methodology for chambers to identify priority motions for amendments
- GA Agenda: includes time to integrate discussion/negotiation slots
- Include the rules and criteria for amendments of motions at the GA in the rules of procedure

### 5 BENEFITS / IMPACT

#### 5.1 Expected impacts of the motion

- More inclusive input and refinement of motions through cross-chamber negotiations and amendments
- Greater motivation to participate actively (in-person) at GAs
- Prevents rigid outcomes when last-minute compromises are still possible
- Increased planning complexity for the BoD and secretariat

#### 5.2 Synergies with work underway:

- The current General Assembly 2025 programme includes several opportunities for chamber and cross-chamber engagement, preparation and negotiations.
- Amendments to statutory and policy motions will generally not be accepted during GA 2025. However, the Rules of Procedures includes an exception to allow for amendments under a structured process. Each chamber may select **one motion** for amendment, with a **total limit of three motions** across all chambers during GA week to ensure focus and avoid delays.
- FSC Membership will vote to approve the Rules of Procedure for the FSC General Assembly 2025 prior the GA.

### 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

#### 6.1 Connections to other motions:

- Not identified

## **6.2 Alternative 1**

### **6.2.1 Status**

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

### **6.2.2 Description**

- n/a

## **7 IN A NUTSHELL**

- The motions is asking the Board of Directors (BoD) and the secretariat to make necessary arrangements to allocate sufficient time and space during General Assemblies (GAs) for both chamber-specific and cross-chamber discussions and negotiations. This includes enabling further negotiation or amendment of already submitted motions, provided those motions are prioritized by the chambers.

### **7.1 Key open questions**

- -

**13/2025 FSC GOVERNANCE REVIEW 3 – FIT FOR PURPOSE –**

Edited | Policy Motion

|                                  | <b>Proposed By</b>     | <b>Seconded By</b>         | <b>Seconded By</b>    |
|----------------------------------|------------------------|----------------------------|-----------------------|
| <b>Name</b>                      | Zandra Martinez        | Natalia Otero Correa       | Margaret Stern        |
| <b>Organization / Individual</b> | Martínez, Zandra, Mrs. | Otero Correa, Natalia, Ms. | Stern, Margaret, Dr.  |
| <b>Chamber / Subchamber</b>      | Economic / South       | Social / South             | Environmental / South |

**Policy Motion (Motion text / High-level action request):**

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

**Mandate**

The General Assembly mandates the FSC Secretariat to **establish and coordinate** a comprehensive Governance Review to ensure that FSC remains effective, functional, and fit for purpose in the current context. To carry out this task, the Secretariat shall establish a paid **Technical Working Group**, with external experts as appropriate and with chamber-balanced perspectives, but not limited to FSC members. The group shall provide technical expertise in line with FSC's standard procedures for technical working groups, with the mandate to conduct the review and prepare recommendations. Risk analyses and impact assessments shall accompany all proposed changes to ensure coherence and long-term effectiveness.

**Expected Outcomes**

Governance Review 3 shall deliver:

1. **Stronger legitimacy and balance**
2. **Greater efficiency**
3. **Fair representation**
4. **Integrity, transparency and accountability**
5. **Future resilience**

## Scope of the Review

The Working Group shall collect and map governance concerns and ideas from members and stakeholders, and integrate them with technical analysis and expertise to develop practical solutions in relation to the expected outcomes, focusing on, but not limited to:

- The continued relevance of FSC's three-chamber system;
- Membership criteria;
- Voting processes;
- The distribution of voting power;
- Network relationships;
- The code of ethics and conduct.

Deliverative spaces to revitalise creativity and foster consensus.

## Background Information and Key Documents:

### Role of the Technical Working Group

The Working Group shall be established as a **technical body** to carry out the review. It shall:

- Conduct the review as mandated by the GA, under the coordination of the Secretariat.
- Collect, analyse, and integrate member and stakeholder feedback with technical expertise to generate reform proposals.
- Develop recommendations that are chamber-balanced, feasible, and aligned with FSC's democratic structure.
- Work in close co-ordination with the Secretariat to ensure that draft proposals are aligned and jointly endorsed before submission.
- Provide its final recommendations, agreed with the Secretariat, for decision by the Board of Directors under its delegation of authority, or by the General Assembly where required.
- Assess risks and unintended consequences to avoid fragmented or piecemeal solutions.

### Rationale

Global developments and internal member feedback demonstrate that FSC's governance framework must evolve to remain relevant and credible. Members have identified challenges such as the weakening of social and environmental chambers, slow decision-making, and insufficient spaces for democratic deliberation. Additionally, FSC will initiate a revision of the Principles and Criteria as well as an update of its Global Strategy, further reinforcing the need for a governance system that is strengthened in democratic principles and fit for purpose. These issues require structural solutions, not piecemeal fixes that risk creating a "whack-a-mole" effect.

[13-2025\\_Carry\\_out\\_FSC\\_Governance\\_Review\\_3\\_20250313122004.pdf](#)

[13-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[13-2025-Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**13/2025** FSC Governance Review 3 – Fit for Purpose –

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- An review of FSC governance resulting in updates and improvements to support the organization's capacity to remain effective, functional and fit for purpose in the current context and that delivers on greater efficiency, fair representation, stronger integrity, transparency and accountability and future resilience.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- A report developed by a chamber-balanced technical working group based on concerns and ideas from members and other stakeholders, that should include recommendations (accompanied by risk analysis and impact assessments). The proposed changes should support coherence and long-term effectiveness, with a focus on (scope of the review), but not limited to:
  - The continued relevance of the FSC's three-chamber system.
  - Membership criteria.
  - Voting processes.
  - The distribution of voting power.
  - Network relationships.
  - The Code of Ethics and Conduct (currently named the Code of Conduct).
  - Deliberative spaces to revitalize creativity and foster consensus.

## **2 GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- Not provided

### **2.2 Contribution to Global Strategy**

- The motion contributes to the following goal:
  - Goal 1.1 (Engage members and stakeholders to drive change as a community): by reviewing and updating the Governance of FSC.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion is clear in calling for a review of FSC's current governance system to support that FSC remains effective, functional and fit for purpose in the current context. This review would be driven by a chamber-balanced technical working group coordinated and supported by the Secretariat, which final delivery would be the presentation of a report with clear recommendations for updating and improvement of the governance.

- The motion identifies that global developments and internal member feedback demonstrate that FSC's governance framework must evolve to remain relevant and credible. Furthermore, it identifies as specific challenges the weakening of the social and environmental chambers, slow decision-making processes and insufficient spaces for democratic deliberation.
- The motion recognizes that the FSC will initiate a revision process of the Principle and Criteria (P&C), as well as an update of its Global Strategy (GS) - according to the motion this reinforces the need for a governance system that is strengthened in democratic principles, fit-for-purpose and that requires structural and comprehensive solutions. While conducting the governance review at the same time as the revision of the P&C and the new GS could create valuable synergies, it would also require significant financial, human, and time resources, with the risk of overwhelming members, the Board, and staff, potentially leading to engagement fatigue, slower decision-making, and a diversion of attention from other critical priorities.
- The motion recognizes that the final recommendation of the Technical Working Group, as agreed with the Secretariat, would have to be presented for decisions by the Board of Directors or by the General Assembly (e.g. should amendments to the statutes be required).

## 4 FEASIBILITY OF IMPLEMENTATION

### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☒ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.4 (Pre)conditions for implementation

- Establishment of a chamber-balanced technical working group, with external experts and with chamber-balanced perspectives, but not limited to members.
- Broader membership engagement would likely be required, and the project would need to be supported by external experts (as appropriate).
- Conclusions of the working group would be contained in a report for presentation and implementation by the Board of Directors under its delegated authority to manage the organisation.
- Potential need for future statutory motions (in GA2028) to implement the results of the proposed governance review.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- The motion requests a review aimed at updating FSC's governance system to align with the organization's current challenges (and expanding size) that would support FSC to remain effective, functional and fit for purpose in the current context. A governance review and updating could lead to improved governance, with the related benefits.

### 5.2 Synergies with work underway:

- Not identified

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- Although broader in scope, this motion is connected to the following statutory motions, as they all relate to FSC's governance:
  - Statutory Motion 01/2025 "Adjusting voting percentages associated with individual and organization members in FSC System".
  - Statutory Motion 03/2025 "Criteria and bases for Protocol to assign new members to the FSC Social, Economic and Environmental Chambers".
  - Statutory Motion 06/2025 "Motion to Strengthen our Code of Conduct applicable to Members and others".
  - Statutory Motion 08/2025 "Statutory Motion to Formalise the Holding of Virtual and Hybrid General Assemblies of Members".

### 6.2 Alternative 1

#### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

- <Assessment in form of a short description of the work>

### 6.3 Alternative 2

#### 6.3.1 Status:

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.3.2 Description

- <Assessment in form of a short description of the work>

## 6.4 Alternative 3

### 6.4.1 Status:

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

### 6.4.2 Description

- <Assessment in form of a short description of the work>

## 7 IN A NUTSHELL

- The motion proposes a comprehensive review of the current Governance of FSC in order for it to be updated and improved, to remain effective, functional and fit for purpose in the existing context. This could result in benefits for FSC. Conducting this new governance review at the same time as the P&C revision and the development of the GS could create valuable synergies, but it could also result in engagement fatigue with its corresponding risks.

### 7.1 Key open questions

- There are still open questions related to the scope of the proposed review that would need to be addressed by the Technical Working Group together with the Secretariat, such as: Is the continued relevance of the three-chamber system questioned? Or is this concern related to the membership allocation criteria? What is meant by “voting processes”? Quorum and voting thresholds to approve motions? rules for Board election? Voting power distribution? Others? What are the concerns identified with the relationship with the Network? What is suggested to change in the Code of Conduct? Are there specific issues identified with the Code of Conduct? What is meant by deliberative spaces to revitalize creativity and foster consensus? Spaces different to the existing General Assemblies and the spaces that are habilitated in preparation for the GA? Or is the proposal to improve the existing spaces?
- The motion does not reference or explain previous governance reviews. Should the outcomes of Governance Reviews 1 and 2 be considered in this new review? Do they provide relevant background and context for this review?

14/2025

## DEVELOPING THE NETWORK IN THE GLOBAL SOUTH THROUGH ENCOURAGING AND ENABLING MEMBERSHIP ENGAGEMENT FOR ESTABLISHMENT OF NEW FSC NATIONAL OFFICES

Merged | Policy Motion

|                                  | Proposed By                        | Seconded By      | Seconded By      |
|----------------------------------|------------------------------------|------------------|------------------|
| <b>Name</b>                      | Thankappannair Rajalayam Manoharan | Peter Dam        | Alan Smith       |
| <b>Organization / Individual</b> | Manoharan, TR, Dr                  | Dam, Peter, Mr.  | Smith, Alan, Dr. |
| <b>Chamber / Subchamber</b>      | Environmental / South              | Economic / South | Social / North   |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025. The motion was merged with motion 16.**

To reinvigorate the Network in the Global South, FSC shall encourage setting up new legally established independent network partners (National Offices) in countries designated as South through active engagements with Members and supporting to mobilize the resources needed. The initiative for the establishment of these Independent Network Partners (INP's) shall come from the local membership and focus on countries hosting FSC certificates or with significant forest cover or market potential, or both. Additional supporting factors for the investment could include the longer term prospects for economic growth in the forest and forest product sectors, the contribution to mitigating climate change, and the potential for protecting indigenous peoples' livelihoods and the forest ecosystems in general, and a loss or reduction of FSC certified areas. As has been stated in previous Global Strategy Plans and governance reviews, effective membership participation, in particular from the Global South is "critical" for fulfilling FSC's mission at the local level.

### Background Information and Key Documents:

There is a marked imbalance between the presence of INPs in the Global South versus the Global North, with negative consequences in promoting FSC goals nationally as well as internationally. Of the INPs in the South, most are located in Latin America with just one (Malaysia) in the Asia-Pacific region and none at all in Africa. Moreover, over the last 14 years, 8 INPs in the Global South have been closed, mainly in Africa but including two in Latin America.

The substitution of membership-run national offices by regional and sub-regional offices has meant that members' local knowledge and contacts, both with governments and potential stakeholders, have not been utilized, resulting in the slow growth of FSC certification especially in important tropical areas. Moreover, opportunities for external funding have been lost. In some regions, notably in Africa and Asia, the absence of FSC on the ground has helped competing certification systems to expand. The presence of an Independent

National Office established as a legal entity will be valuable to the FSC International Members from the country to effectively contribute their resources to promote FSC locally in addition to directly engage with Government programs.

Therefore, a rapid reversal is required to counter the downward trend which has reduced INP presence and replaced it with centrally controlled entities. As has been shown in the Global North, the most effective way to promote FSC is through national membership engagement. To restart the process, no time should be lost in setting-up INP national offices in areas where viable INPs could operate to get across the FSC message of the value of responsible forest management.

The expected outcomes of this motion are not only to increase the uptake of FM and CoC certification and attract more membership involvement but also to deliver wider benefits such as more empowerment of indigenous peoples and local forest communities, securing workers' rights, gaining government recognition, mobilizing additional resources needed for implementing FSC Mission and protecting ecosystems from deterioration. The market value of FSC in certifying responsible forestry will also be demonstrated. Overall, the achievement of these outcomes through locally managed national offices will enhance the image of FSC both nationally and internationally.

This motion links to the Strategy 1.1. of FSC Global Strategic Plan 2021-26: Engage members and stakeholders to drive change as a community for co-creation of solutions.

[14-2025\\_Developing\\_the\\_Network\\_in\\_the\\_Global\\_South\\_V1\\_20250313125051.pdf](#)

[14-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[14-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[14-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

14/2025

**Developing the Network in the Global South through encouraging and enabling membership engagement for establishment of new FSC National Offices**

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- Reinvigorating the Global South through the establishment of Network Partners

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- Having well-functioning Network Partners in the Global South in countries most relevant to FSC achieving its mission.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

Strategy 1.1. of FSC Global Strategic Plan 2021-26: Engage members and stakeholders to drive change as a community for co-creation of solutions

### **2.2 Contribution to Global Strategy**

Strong local operations with active chamber balanced membership that are in close touch with stakeholders and assure FSC is visible locally are core to growing FSC's impact.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

I find the Motion very clear in its intent and outcome orientation: strong local member-led Network Partners in the South are crucial for FSC to achieve its mission. It also recognizes that the initiative for the new NPs needs to sit with local membership, and that a focus needs to be in countries with significant forest and/or market potential. What is less specific is its ambition: how many NPs, and what timeline the Motion proposers have in mind. This makes it not possible to put a meaningful estimate forward on time and costs associated to the implementation.

## **4 FEASIBILITY OF IMPLEMENTATION**

### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months  
☐ 6 months – 1 year  
☐ 1 – 3 years  
☐ More than 3 years

### **4.2 Estimated one-time costs:**

- ☐ Up to 10.000 EUR

- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### **4.3 Estimated ongoing costs (per year):**

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### **4.4 (Pre)conditions for implementation**

- We need to support Membership engagement and growth in the identified countries. This will likely require a dedicated local resource hired by FSC, who facilitate the process, and offers active support in induction and onboarding of the new entity into the Region.

### **5 BENEFITS / IMPACT**

#### **5.1 Expected impacts of the motion**

- There is no specific number of NPs indicated nor a timeline, this is hard to estimate.

#### **5.2 Synergies with work underway:**

- Work underway happens mostly in the global network unit, with active support from the membership unit. We have created a Network Partner readiness assessment tool to more categorically track 'readiness' of countries / clusters of members to form an NP. We meanwhile develop membership through newly hired dedicated regional membership managers. Our existing local National Representatives have more priority assigned to growing membership as part of their ongoing work. The regional hubs actively sustain dialogue with members in countries that have a critical mass of members to seek their interest to apply for Network Partner, or as an interim mechanism, create a local FSC Advisory Committee.

### **6 ALTERNATIVES**

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

#### **6.1 Connections to other motions:**

- Possibly with Motion 16? Though this is less specific on Global South.

#### **6.2 Alternative 1**

##### **6.2.1 Status**

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

##### **6.2.2 Description**

- Assessment in form of a short description of the work

## **7 IN A NUTSHELL**

- In summary, the Motion is clear in intent and direction, however leaves it open how ambitious it wants to be. Creating a conducive ground for new NPs requires a lot of support and a local resource, so depending on how many countries and how fast the Motion proposers would want to see thriving new NPs in the South will impact a lot on the feasibility assessment.

### **7.1 Key open questions**

- There are some statements that are not correct and these could be misleading, or less helpful, to find ways to achieve the intent of the Motion (for ex '8 INPs in the Global South have been closed'; 'the substitution of membership-run national offices by regional and sub-regional offices'; '[...] rapid reversal is required to counter the downward trend which has reduced INP presence and replaced it with centrally controlled entities'. Also, there are causal relations put as assertions that require more accuracy and nuance in order to provide a truthful picture of the experience in the past years (for ex 'As has been shown in the Global North, the most effective way to promote FSC is through national membership engagement'; 'In some regions, notably in Africa and Asia, the absence of FSC on the ground has helped competing certification systems to expand').

15/2025

## FSC REGIONAL COMMITTEES: TOWARDS OPTIMISED MANAGEMENT, EFFECTIVE DECENTRALISATION AND ENHANCED STRATEGIC CONTROL

Edited | Policy Motion

|                                      | Proposed By                          | Seconded By                     | Seconded By                         |
|--------------------------------------|--------------------------------------|---------------------------------|-------------------------------------|
| <b>Name</b>                          | Jocelyn Djamano<br>Ngandombelo       | Victoire Elonga<br>Lubila       | Alidor Kass Muteba<br>Kasongo       |
| <b>Organization /<br/>Individual</b> | Djamano Ngandombelo,<br>Jocelyn, Mr. | Lubila, Victoire<br>Elonga, Ms. | Muteba Kasongo,<br>Alidor Kass, Mr. |
| <b>Chamber /<br/>Subchamber</b>      | Environmental / South                | Economic / South                | Social / South                      |

### Policy Motion (Motion text / High-level action request):

*Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.*

## 1. Introduction

As part of the operation and structuring of the FSC, it is essential to set up Regional Committees spread across the four regions concerned. This initiative aims to optimise member management, decentralise activities, and encourage greater local involvement.

The creation of these regional committees is a strategic lever enabling the FSC to better structure its actions and ensure better governance at regional level.

### 1.1. Regional Committee objectives

#### 1.1.1. Decentralisation of work

By setting up these regional structures (RCs), the FSC's management burden will be better distributed, facilitating more effective understanding and monitoring-evaluation of regional and local members and projects.

#### 1.1.2. Improved management of members, membership fees and subscriptions

It is important to note that each Regional Committee will be responsible for overseeing the subscriptions of new members, monitoring their commitment and integrating them into ongoing initiatives.

This will also enable tighter control of membership fees and simpler coordination of administrative procedures linked to membership subscriptions.

### 1.1.3. Strengthening members' knowledge of the FSC

The Regional Committees will be responsible for organising regular training courses, seminars and awareness-raising workshops to enhance members' skills in areas relating to the environment and the fundamental principles of the FSC.

## **2. Roles and responsibilities of the Regional Committee**

To ensure better coordination and fluidity in the management of the FSC, the Regional Committee will be a key player in permanent contact with General Management and the Board of Directors. Its role will be to optimise membership, membership fee management and governance processes at regional level.

### 2.1. Receiving approval from the Board of Directors to prepare upstream work

Subject to articles 12, 14 and 16 of the FSC's Articles of Association, which confer decision-making powers on the Board of Directors with regard to membership subscriptions and the management of membership fees, the Regional Committee will be of great assistance in lending more pragmatism to the procedure.

- Prior to the submission of membership applications to the relevant body, the Committee will carry out an initial assessment of applications in order to speed up the process;
- This will considerably reduce the time it takes to join, which is a constraint for many people wishing to join FSC International.

### 2.2. Regulation of membership fees

- The Committee will be responsible for organising and monitoring membership fees at the regional level;
- It will ensure financial transparency, facilitating better coordination of member contributions.

### 2.3. Establishment of a Regional Council to review membership applications

- Once the discharge has been received, the Regional Council will meet to analyze the applications of the new members;
- It will then submit a detailed report to the competent authority within a reasonable timeframe, ensuring that decisions are taken quickly and efficiently.

#### 2.4. Integration of regional managers into the Regional Committees

- The regional players in charge of various missions will automatically be affiliated to Regional Committees, which will officially represent the FSC in their respective regions;
- This structure will ensure better representation and coordination of activities within each region.

### **3. Implementation of FSC management software**

On this occasion, the integration of a dedicated FSC software package for managing members and all related activities would optimise member follow-up at regional level, streamline the membership application and subscription processes, and strengthen interaction between the various FSC bodies.

#### 3.1. Software objectives and main features

The development of this multi-platform software (mobile and web application) will provide a centralised digital solution, enabling efficient management of all member-related activities.

##### 3.1.1. Membership fee management platform

- Online registration of new members with tracking of application status;
- Membership validation system (with integration of the Regional Council's discharge process);
- Sending of notifications to members concerning the progress of their request.

##### 3.1.2. Automated membership fee management

- The interface enabling members to track their payments and membership fees;
- Automatic generation of payment receipts and contribution history;
- Integration of secure electronic payment methods (Visa card).

##### 3.1.3. Communication and interaction with members

- Internal messaging to facilitate exchanges between members and regional committees;
- Announcements, events and important decisions;
- Module for managing discussion forums and mutual assistance between members.

##### 3.1.4. Access to resources and training

- A digital library with access to key documents on the environment and the FSC;
- Training and awareness module (videos, quizzes, interactive courses);
- Monitoring of the development of members' skills via digital certifications.

##### 3.1.5. Administrative dashboard

- Preparation and monitoring of membership and activity statistics;
- Implementation of management and reporting tools for regional committees and General Management;
- Automation of administrative tasks for greater efficiency.

### 3.2. Architecture and technologies to be considered through this Software

- Mobile application (Android & iOS) and web platform;
- Secure database for managing member information;
- Cloud computing to facilitate regional access and interconnectivity;
- Encryption systems to secure transactions and data.

## **4. Setting up an exchange platform between FSC label subcontractors and FSC members**

With a view to optimising business relations and sustainable development, the creation of a digital platform dedicated to connecting FSC label subcontractors and FSC members is a strategic necessity. This platform will improve transparency, simplify exchanges and increase collaboration opportunities.

### 4.1. Objectives and benefits of the platform

#### 4.1.1. Facilitating commercial and technical exchanges

- Fast and efficient connection between FSC-certified subcontractors and FSC members wishing to source standards-compliant products or services;
- Integration of an internal messaging system to facilitate direct communication.

#### 4.1.2. Access to a database of FSC subcontractors

- Creation of a digital register enabling FSC members to consult the catalog of certified subcontractors according to their areas of expertise (timber, paper, packaging, etc.);
- Possibility of advanced search with filters on location, specialisation and certifications.

#### 4.1.3. Evaluation and feedback system

- Implementation of a rating system based on the experience of FSC members with a subcontractor;
- Encouraging transparency and compliance with FSC label commitments.

#### 4.1.4. Space dedicated to opportunities and collaborations

- Publication of partnership offers and projects related to sustainable forest management;
- Possibility for subcontractors to advertise their services and innovations.

#### 4.1.5. Integration with FSC management software

- Synchronisation with the global FSC platform to facilitate verification of company certification and status;
- Automated updating of lists of approved subcontractors.

## 5. Conclusion

In our minds, there is a voracious appetite to see regional governance strengthened for a more effective and inclusive FSC

There is no need to demonstrate once again that the establishment of FSC Regional Committees represents a strategic step towards optimised management, effective decentralisation and better control of organisational processes. Thanks to this structure, the FSC will be able to streamline membership applications, regulate fees more effectively and build capacity in environmental issues and FSC certification.

The integration of management software and an exchange platform between FSC subcontractors and members further strengthens this initiative, offering modern, innovative tools to guarantee transparency, speed up decision-making and facilitate interaction between FSC players.

By combining rigorous management, regional governance and digital tools, the FSC is positioning itself as a more dynamic, accessible and effective organisation, capable of responding to contemporary challenges while ensuring that its commitments to sustainable forest management are respected.

This integrated vision paves the way for agile administration, greater member involvement and enhanced operational efficiency at local and international level.

Roles and responsibilities are clarified in the attached documents (Organisational Structure - Job Description and Procedures Manual). This will once again be presented at the General Assembly to ensure a common understanding of the missions of Regional Committee agents. The Procedures Manual will serve as a guide to standardise practices and ensure consistent, harmonised management at all levels.

### **Background Information and Key Documents:**

### Additional reasons arising from the expected outcomes

This motion is of the utmost importance, as the establishment of these Regional Committees is essential to the smooth running of the organisation.

Here are the gains that can be expected:

- Acceleration of the FSC International membership process through automation, fluidity in the management of members' memberships and subscription fees, and improved transparency and financial reliability;
- Better coordination of activities thanks to local teams;
- Greater member involvement through local initiatives;
- Development of skills in the environment and sustainable management;
- Strengthened regional structures and improved representation;
- Clarified roles and procedures for better governance;
- Simplified, centralised communication between all players;
- Enhanced members' knowledge via an educational platform;
- Better coordination between Regional Committees and the Board of Directors;
- Simplified access to FSC-certified subcontractors;
- Optimised exchanges and collaborations;
- Greater transparency and traceability in forest certification;
- Improved competitiveness of FSC stakeholders;
- Accelerated sustainable development through responsible choices.

[15-2025\\_Comites\\_Regionaux\\_du\\_FSC\\_V1\\_20250130094257\\_French\\_original\\_0.pdf](#)

[15-2025\\_FSC\\_Regional\\_Committees\\_V1 ENG.pdf](#)

[15-2025\\_Comites\\_Regionales\\_V1\\_SPA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**15 FSC REGIONAL COMMITTEES**

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

**1 ENVISAGED OUTCOME AND DELIVERABLES**

**1.1 Stated or Assumed Outcome**

Supporting and streamlining membership applications and engagement which is delegated to Regional level through the establishment of Regional Committees (RCs)

**1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

Active, informed and engaged members who contribute to FSC's policies and developments in country and in the region. Assumed deliverables would include digital solutions to effectively liaise and administer members that today might be impaired due to the currently available infrastructure.

**2 FSC GLOBAL STRATEGY 2021-2026**

**2.1 Link to Global Strategy**

No such link indicated

**2.2 Contribution to Global Strategy**

- This could link to Global Strategy 1.1 'Engage members and stakeholders to drive change as a community for co-creation of solutions'.
- Strong and active chamber balanced membership is core to growing FSC's impact.

**3 CLARITY & SPECIFICITY OF THE MOTION**

The revised Motion has expanded in scope of desired outcomes, elaborating on wide range of areas what the Motion needs to achieve. It has bundled various operational and strategic objectives in one Motion, from better membership fee administration to creating a digital platform for third parties to engage and be consulted. It also suggests certain infrastructure to be built or made available including certain management software and use of certain technology to achieve it.

**4 FEASIBILITY OF IMPLEMENTATION**

**4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months  
☐ 6 months – 1 year  
☒ 1 – 3 years  
☐ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

Assuring there is capacity in the Technology unit to develop the software, digital tools and management platform envisioned. Assuring there is capacity in the Membership unit to look into the data requested about membership and engagement, build the analytics and liaise with the local staff what actions or support might be required. Establishment and support to a new committee in addition to the existing mechanisms and developing new procedures will require resources and time from existing staff.

### 5 BENEFITS / IMPACT

#### 5.1 Expected impacts of the motion

The scope is that wide that the expected impact of the Motion is hard to extract, other than a more generic improvement of how FSC creates greater support and interconnectivity in the membership. It is difficult to gage the impact of the Motion, as it is not very specific what 'success' looks like and what problems it seeks to address. >

#### 5.2 Synergies with work underway:

A Membership mentorship programme is envisioned, and existing staff are supporting with targeted membership growth on an ongoing basis.

### 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

#### 6.1 Connections to other motions:

N/A

#### 6.2 Alternative 1

##### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

#### 6.2.2 Description

A membership mentorship program is envisioned to commence soon and this can be incorporated as part of their responsibilities.

### 6.3 **Alternative 2**

#### 6.3.1 Status:

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.3.2 Description

Establishing a member-committee to support the membership manager to help vet applicants, and also, actively support the recruitment of new members.

### 6.4 **Alternative 3**

#### 6.4.1 Status:

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.4.2 Description

Adding administrative support to the membership manager to support members to send or pay their membership fees through paypal or bank transfer solutions.

## 7 **IN A NUTSHELL**

The Motion aims to optimize membership engagement, decentralize operations and encourage greater local involvement. It then lays out many solutions to achieve them, ranging from operational and technical infrastructure to more strategic and governance related activities to implement. Some of these are in line with proposed work to strengthen membership in FSC, some have dependencies on Technology, and on Membership strategy, that are difficult to gage and assess.

### 7.1 **Key open questions**

The Motions suggests adding a wholly new structure and procedure, which seems to add more time to process and procedural complexity rather than resolving the underlying issues related to membership operations. As is often raised by members as well as staff, we have concerns about inactive members as much as we have concerns about the slow growth of membership. We believe the envisioned membership mentorship programme could be one way to begin addressing that. It may help drive greater accountability among members and ensure a more engaged and active community? We look forward hearing from the Motion proposers on these thoughts.

**17/2025 CERTIFICATE HOLDER OMBUDSMAN**

Accepted by MC | Policy Motion

|                                  | Proposed By                          | Seconded By                              | Seconded By            |
|----------------------------------|--------------------------------------|------------------------------------------|------------------------|
| <b>Name</b>                      | Christopher Gibbons                  | Tim Cronin                               | Shoana Humphries       |
| <b>Organization / Individual</b> | American Green Consulting Group, LLC | World Wide Fund for Nature International | Humphries, Shoana, Ms. |
| <b>Chamber / Subchamber</b>      | Economic / North                     | Environmental / North                    | Social / North         |

**Policy Motion (Motion text / High-level action request):**

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

FSC International shall establish the paid position of a Certificate Holder Ombudsman at the International level, whose primary goal is to troubleshoot certificate holder (CH) concerns, and either solve the issue or connect those CHs to the proper support teams at FSC and elsewhere.

**Background Information and Key Documents:**

1. Merriam Webster definition: a person who investigates, reports on, and helps settle complaints : an individual usually affiliated with an organization or business who serves as an [advocate](#) for patients, consumers, employees, etc.
2. Also from Merriam Webster: *Ombudsman* was borrowed from Swedish, where it means "representative," and ultimately derives from the Old Norse words *umboth* ("commission") and *mathr*("man"). Sweden became the first country to appoint an independent official known as an ombudsman to investigate complaints against government officials and agencies. Since then, other countries (such as Finland, Denmark, and New Zealand), as well as some U.S. states, have appointed similar officials. The word also designates a person who reviews complaints against an organization (such as a school or hospital) or to someone who enforces standards of journalistic ethics at a newspaper.

Two of the most common complaints we hear in the certification support industry (consultants, certification bodies, group managers, etc.) is that

1. "FSC doesn't listen to the people who are doing all the actual work in the system, and paying the bills for everyone"\*, i.e. certificate holders
2. Certificate holders have no idea whom to talk to when they have a problem that doesn't rise to the level of a formal complaint. So they cast about for anyone, and get frustrated.

Additionally, while FSC International has made some significant strides in recent years (the trademark team most especially comes to mind), there continues to be a gap in service between response times and response thoroughness with regards to European and non European requests. This is not an accusatory fact, but rather a recognition of a basic human condition. It's simpler to respond, and the response takes less mental energy to craft, to someone who shares a basic framework of understanding. FSC is based in Europe. Creating a position whose sole existence is designed to overcome barriers, internally and externally, will serve to streamline and smooth communication and interaction between FSC and CH.

Lastly, FSC does seem to recognize the concepts inherent in this motion, as FSC International is currently advertising for a Customer Service Manager position. However, words matter, and the title of Ombudsman carries a specific heft, as well as a certain expected level of independence, that a customer service position alone simply does not. We therefore think this position explicitly has merit, outside of any other activities that FSC is currently engaged in within this sphere.

\*an actual quote from a CH

[17-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

[17-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[17-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**17/2025** **CERTIFICATE HOLDER OMBUDSMAN**

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

**1 ENVISAGED OUTCOME AND DELIVERABLES**

**1.1 Stated or Assumed Outcome**

- FSC International establishes a paid Certificate Holder Ombudsman position to address certificate holder concerns, resolve issues, or connect certificate holders to appropriate support teams.

**1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- Establishment of new a position at FSC International and hiring of a qualified individual.

**2 FSC GLOBAL STRATEGY 2021-2026**

**2.1 Link to Global Strategy**

- - (not provided).

**2.2 Contribution to Global Strategy**

- Strategy 2 "Transform markets", Goal 2.1 (Advance FSC in Value Chains).

**3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion is overall clear and specific.
- One area that requires further attention is the title of the role - Certificate Holder Ombudsman. The term "*Ombudsman*" typically refers to an independent, impartial entity responsible for investigating and resolving formal disputes.
- Based on the motion's wording, the proposed role appears to be more focused on *guidance, support, and communication facilitation* rather than formal dispute resolution. The motion emphasizes the need to "listen to people who are doing the actual work in the system," address "a problem that does not rise to the level of a formal complaint," and "overcome barriers" by improving interaction between FSC and certificate holders.
- For the purpose of this document, the FSC Secretariat is approaching the assessment of the motion from a guidance, support, and communication facilitation perspective, rather than formal dispute resolution.

**4 FEASIBILITY OF IMPLEMENTATION**

**4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months
- ☒ 6 months – 1 year
- ☐ 1 – 3 years
- ☐ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

- **Enhance customer centricity & adapt internal roles:** In relation to normative enquiries, FSC International has historically maintained a limited direct relationship with certificate holders due to its role within a third-party certification system. Responsibilities have traditionally been managed through certification bodies, and direct client engagement has been minimized to preserve neutrality as a scheme owner and standard setter. However, to better meet the evolving needs of certificate holders, FSC International must enhance its customer centricity. This includes re-evaluating and adapting the roles and responsibilities of internal experts.
- **Centralize certificate holder enquiries:** Currently, certificate holders submit enquiries to FSC through 40+ separate inboxes, each associated with different topics. This fragmented approach creates challenges in managing, tracking, and responding to enquiries in a timely and consistent manner. Implementing a centralized enquiry system—with a single point of entry and clearly defined response protocols—would enhance operational efficiency.
- **Ensure adequate capacity:** FSC International currently receives over 5,500 enquiries each month. Given the size of our certificate holder audience and the high volume of enquiries, it is essential to have multiple dedicated roles in place to effectively address certificate holder concerns and connect certificate holders to the appropriate support teams.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- **Improved certificate holder experience:** the role can reduce confusion and frustration, leading to a better overall experience for certificate holders.
- **Increased agility and responsiveness:** the role can identify recurring issues and trends, enabling FSC to adjust processes or improve communication proactively, rather than waiting for formal complaints to arise.
- **Strengthened stakeholder relationships:** having a liaison or representative for certificate holders reinforces trust and shows that FSC values its stakeholders' concerns.
- **Enhanced value proposition:** a support-focused role reinforces FSC's commitment to its mission, improving its value proposition to both existing and prospective certificate holders.
- **Long-term strategic benefits:** FSC may benefit from increased brand loyalty as certificate holders feel better supported and valued.

- **Misleading expectations:** One unintended impact of the motion could be to create misleading expectations regarding the role's authority and scope. This is because the term "Ombudsman" typically refers to an independent, impartial entity responsible for investigating and resolving *formal disputes*. Based on the motion's wording, the proposed role appears to be focused on guidance, support, and communication facilitation rather than formal dispute resolution.

## 5.2 Synergies with work underway:

- FSC International hired in 2024 a Certificate Holder Experience Manager to map priority user journeys and identify opportunities to streamline the certification process, improve transparency, and enhance the experience of the FSC certificate holders.
- FSC International has recently conducted a Global Client Survey to gain up-to-date insights into worldwide perceptions and experiences of our certificate holders. We are now in the process of collecting and reviewing the feedback .
- FSC International has set up a Customer Care Programme to ensure efficient and effective handling of client enquiries. .

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- One of the deliverables of Motion 33 "*Strengthening FSC's Value Proposition*" is a Service Orientation Action Plan that supports Forest Management uptake and maintenance.

### 6.2 Alternative 1

#### 6.2.1 Status

- ☐ For potential consideration
- ☒ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

- The Customer Care Programme has already been established at FSC International, and the team is now working on several projects to improve interactions with certificate holders and other stakeholders. These professionals will be responsible for developing a comprehensive roadmap for customer care at FSC. This roadmap will specifically address the topic of this Motion, namely ensuring timely responses to certificate holders' concerns and connecting certificate holders with the appropriate support teams.
- In line with best practices for customer care, the Customer Care team focuses on improving all touchpoints with our stakeholders and enhancing the case resolution process. A pilot project has already been completed for the EUDR solution .

[Sections 6.3 and 6.4 deleted]

## 7 IN A NUTSHELL

- The motion proposes the establishment of a paid Certificate Holder Ombudsman position at the international level to address certificate holder concerns, resolve issues, or connect certificate holders to appropriate support teams.

- We welcome the intent of the motion, particularly its emphasis on service orientation and investment in customer support roles. However, we would like to raise the following considerations:
- a) The term "Ombudsman" typically refers to an independent, impartial entity responsible for investigating and resolving formal disputes. However, based on the motion's wording, the proposed role appears to be focused on guidance, support, and communication facilitation rather than formal dispute resolution. As such, the title "Ombudsman" may set inaccurate expectations about the role's authority and scope. A more suitable title could be "Certificate Holder Liaison", serving as a point of contact for certificate holders seeking guidance, or "Certificate Holder Representative", ensuring that certificate holders' voices are heard within FSC.
- b) FSC International currently receives over 5,500 enquiries each month. Given the size of our certificate holder audience and the high volume of enquiries, it is essential to have multiple dedicated roles in place to effectively address certificate holder concerns and connect certificate holders to the appropriate support teams.

## **7.1 Key open questions**

- Is the proposed role's function to provide support, guidance and communication facilitation to certificate holders, including potentially directing them to the formal dispute resolution process, or is it intended to serve as a formal dispute resolution entity with independent authority to investigate and address complaints?
- Given the size of our certificate holders audience and the volume of enquiries FSC receives each month, is one role sufficient to meet service expectations?

18/2025

## TRAINING AS A BENEFIT TO FSC STAFF AND MEMBERS: TRAINING IN ISO QUALITY ASSURANCE, RISK IDENTIFICATION AND RISK MANAGEMENT AND THE FSC NORMATIVE FRAMEWORK FOR FSC COORDINATORS AND FSC MEMBERS OF WGS AND TWGS

Edited | Policy Motion

|                                  | Proposed By           | Seconded By        | Seconded By                   |
|----------------------------------|-----------------------|--------------------|-------------------------------|
| <b>Name</b>                      | John Palmer           | Chris van der Goot | Hubertus van Hensbergen       |
| <b>Organization / Individual</b> | Palmer, John, Mr.     | Ecohout Foundation | van Hensbergen, Hubertus, Dr. |
| <b>Chamber / Subchamber</b>      | Environmental / North | Social / North     | Economic / North              |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

The FSC Secretariat will develop a training course for all coordinators of FSC chamber-balanced Working Groups (WGs) and Technical Working Groups (TWGs) and similar entities, and all FSC subscribing members who volunteer and may be appointed by the Secretariat to serve on such chamber-balanced Working Groups, Technical Working Groups and similar entities. The training course will teach the elements of ISO-type quality assurance, risk assessment and the nature and development of the FSC normative framework.

All FSC coordinators of WGs and TWGs and similar entities will take this course and be so certificated if they pass. All potential members of WGs and TWGs and similar entities will be offered this training course, and will only be appointed to be part of such WGs, TWGs or similar entities if they are certificated as passing the training course or can demonstrate to the satisfaction of the FSC Chief Operating Officer (COO) that they have an up-to-date working knowledge of the contents of the training course, and can effectively apply such knowledge.

The development and/or delivery of the training course may be contracted to a third party. The material of the training course will be updated at least annually by or through the Secretariat, and will be so reported in the FSC Annual Report.

Delivery of the course may be arranged through the Secretariat or be contracted to FSC Independent National Partners. The course may be organised for in-person teaching, online or in hybrid mode, at the discretion of the COO. Monitoring of the effectiveness of the training will be reported by each WG/TWG coordinator to the COO.

FSC will cover all the costs associated with this training, for FSC staff and FSC members volunteering for WGs, TWGs and similar entities.

### **Background Information and Key Documents:**

The understanding of the nature of Responsible Forest Stewardship (RFS), as certified according to the FSC normative framework, continues to evolve. There is more attention to mitigation of the negative impacts of climate heating, to conservation of biodiversity and ecosystems, and to restore damaged ecosystems. At the same time, FSC has re-discovered the need in quality assurance to understand and base its normative framework on risk assessments. The complex and variable nature of RFS makes it truly difficult to develop a globally meaningful, comprehensive yet locally workable normative framework. And FSC is committed in its Global Strategy to streamlining and simplification of that framework.

Full-time professionals struggle to address these conflicting needs. FSC members who volunteer to participate in WGs or TWGs to develop or review one of the numerous documents in the FSC normative framework very often also have full-time jobs. In recent years, members of chamber-balanced WGs have shown the difficulty of understanding the nature of the problems to be solved and the range of tools which FSC can and does use to evolve the normative framework. It is not surprising that much time is spent in the WGs in strengthening the knowledge and understanding of the members, on the Standards and Procedures which FSC already has, and how to evolve the next generation.

FSC is gradually reverting to using professional consultants to prepare first drafts of new and revised normative documents. However, there is still a tremendous load of reading and understanding placed on WG members. The technical complexity of legal English used in the normative framework is a challenge even for native speakers of the English language

FSC's participation in new kinds of Standards and product tracing systems, such as the European Union Deforestation Regulation (EUDR), has increased the demand for members able to participate actively,

efficiently and effectively in the evolution of the FSC normative framework. Our Motion is one element in this task. Approval and implementation of this Motion will also benefit personally the active subscribing members.

What is this about? – enabling and certificating FSC staff and members to have a common level of knowledge and understanding about risk identification, assessment, and management before they start in a chamber-balanced Working Group or Technical Working Group with specialist consultants. Training to be paid by FSC because a uniform level of knowledge should make Normative Framework development so much easier and more efficient.

Why does it matter? – increased complexity of FSC Normative Framework alongside commitment to streamlining and simplification requires a higher and common level of skill for participants in WGs and TWGs. For several years past, WGs have struggled with some staff and members having not enough basic knowledge or experience about the essential understanding of various aspects of risk, so the time to complete a WG's task has grown longer and the results less usable, in some cases, needing to repeat the task for a usable product.

This Motion #18 would give all successful participants a marketable certificate of knowledge and competence.

[18-2025\\_Training\\_in\\_ISO\\_quality\\_assurance\\_risk\\_assessment\\_and\\_the\\_FSC\\_NF\\_20250313124559.pdf](#)

[18-2025\\_Final\\_Feasibility\\_Assessment\\_EN.pdf](#)

## FINAL FSC SECRETARIAT MOTION FEASIBILITY ASSESSMENT

18/2025

**Training as a benefit to FSC staff and members: training in ISO quality assurance, risk identification and risk management and the FSC normative framework for FSC coordinators and FSC members of WGs and TWGs**

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

### 1 ENVISAGED OUTCOME AND DELIVERABLES

#### 1.1 Stated or Assumed Outcome

To enable FSC process leads and all FSC members participating in expert and chamber-balanced working groups and similar entities to participate actively, efficiently and effectively in the evolution of the FSC normative framework.

#### 1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed

- The FSC Secretariat will develop a training course for process leads and FSC members participating in working groups to teach the elements of ISO-type quality assurance, risk identification and risk management and the nature and development of the FSC normative framework.
- A process is set up for annual amendment, reporting and monitoring.
- Process leads and members are only appointed if they have passed the training course or demonstrated up-to-date working knowledge on the contents of the training course to the Chief Operating Officer.

### 2 FSC GLOBAL STRATEGY 2021-2026

#### 2.1 Link to Global Strategy

- - (no such link stated)

#### 2.2 Contribution to Global Strategy

Some connection can be made towards Goal 1.2 “Streamline policies and standards towards outcome orientation”.

### 3 CLARITY & SPECIFICITY OF THE MOTION

The motion is clear and specific: defining for whom the training is, an outline of the topic areas, who shall do oversight within FSC and attributing costs, regulating who could develop it, defining options for how the training could be delivered, defining the frequency of updates of the training, the monitoring and the reporting.

### 4 FEASIBILITY OF IMPLEMENTATION

#### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

- A training specialist to support/ develop the training and to support annual maintenance
- A technical platform to host the training (assuming at least a partial online component)
- A process to ensure involvement of the FSC Secretariat Joint Works Council who has co-determination rights for staff related training

### 5 BENEFITS / IMPACT

#### 5.1 Expected impacts of the motion

- The proposed measures are suitable to achieve the intended outcome of an improved engagement of process leads and FSC members in working groups.
- The additional time needed to pass training with an exam might deter some FSC members from joining working groups.

#### 5.2 Synergies with work underway:

The Policy and Performance unit has created a new work area on competence development and will invest resources in developing and delivering trainings on drafting requirements, normative process management in 2026 and content modules for its staff starting 2026, which could be expanded to be accessible to working groups (see below).

### 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

#### 6.1 Connections to other motions:

- (none identified)

#### 6.2 Alternative 1

##### 6.2.1 Status

- ☐ For potential consideration
- ☒ Planned / in preparation
- ☐ Already started

☐ Already exists

#### 6.2.2 Description

Trainings modules and training sessions are planned to be developed as part of the new competence development work area. The current plan is to at least initially focus on FSC staff of the Policy and Performance Unit, however parts of the training could be further developed to also become applicable to FSC members (and Experts) participating in working groups in a second step.

### 7 **IN A NUTSHELL**

- The motion is clear and specific, regulating some aspects in a very detailed manner, but also giving some room for design of the actual training.
- The FSC Secretariat has also identified this topic as an important area to strengthen the quality and robustness of normative processes and the normative framework. Therefore, there is some overlap with work that is being planned, but the planned work differs in scope and sequence.

#### 7.1 **Key open questions**

The motion implies that there is one training for all FSC members, whereas a modularity of trainings could be better suited to meet the demands.

19/2025

**ENHANCING FSC’S HUMAN RESOURCE PRACTICES TO STRENGTHEN ORGANISATIONAL IMPACT**

Accepted by MC | Policy Motion

|                           | Proposed By         | Seconded By                        | Seconded By      |
|---------------------------|---------------------|------------------------------------|------------------|
| Name                      | Alessandro Leonardi | Thankappannair Rajalayam Manoharan | Alan Smith       |
| Organization / Individual | ETIFOR              | Manoharan, TR, Dr                  | Smith, Alan, Dr. |
| Chamber / Subchamber      | Economic / North    | Environmental / South              | Social / North   |

**Policy Motion (Motion text / High-level action request):**

*Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.*

**Context:** High staff turnover at FSC adversely affects the organisation’s technical and financial performance, its ability to effectively engage with stakeholders and members, and its capacity to deliver meaningful impacts on the world’s forests and the communities that depend on them. Addressing this challenge is essential to ensure FSC’s mission is achieved effectively and sustainably.

**High-level action request:** To address these challenges and improve organizational performance, FSC shall:

- 1. Comprehensive HR Strategy Review:** Conduct a thorough review of current human resources strategies, policies, processes, and practices, adopting a holistic approach aligned with the concept of the employee journey—from recruitment to departure or retirement. Collect reliable and comprehensive data on key HR metrics across all levels of the organization. This data should include but not be limited to: Retention and turnover rates; Employee compensation benchmarking; Engagement and satisfaction levels; and Talent development outcomes. Use these insights to develop an in-depth report highlighting strengths, gaps, and actionable areas for

improvement.

2. **Development of an FSC People and Culture Strategy:** Design a forward-thinking People and Culture Strategy, accompanied by an actionable plan and allocated budget, to (i) Enhance talent attraction and retention; (ii) Strengthen employee engagement and organizational culture; (iii) Foster career growth and talent development; Improve staff well-being, and Cultivating an inclusive and innovative organizational culture.
3. **Outcome-Oriented Objectives:** Implement and monitor the strategy with clear metrics for success, ensuring it aligns with FSC's broader mission to conserve the world's forests. The expected outcomes include: i) Reduced turnover rates; ii) Enhanced organizational resilience; iii) Improved stakeholder engagement and technical performance; and iv) Stronger capacity to deliver impactful results globally.

By adopting this motion, FSC will address its HR challenges strategically, strengthening its workforce and, in turn, its ability to fulfil its critical mission of forest stewardship and community well-being.

Timing: the analytical phase should be performed by 2026, and the new strategy and action plan should be implemented starting from 2027.

Budget: 100.000 dollars. This budget doesn't include the implementation budget of the new approach, which should be proposed by the strategy itself.

## **Background Information and Key Documents:**

### **Policy Justification: The Critical Role of Employees in Organizational Success**

Employees are one of the most important stakeholder groups for any organization. They are the backbone of operations, executing work, delivering value, and interacting with other stakeholders. Moreover, employees embody the organization's identity and roots, shaping its culture and driving its mission forward.

In this context, **employee attraction and retention are pivotal for organizational success**, influencing productivity, morale, and financial performance. This is especially true in developed economies, where demographic stagnation and dynamic job environments have intensified talent competition. The ability to attract and retain skilled employees is now a key determinant of organizational resilience and performance.

A strong employer brand plays a vital role in attracting top talent, while effective retention strategies foster satisfaction, engagement, and long-term productivity—cornerstones of sustained success.

However, as talent competition continues to grow, particularly among younger generations who are expected to spend less time within a single organization, the challenges for FSC are clear. For a mission-driven organization like FSC, where technical expertise, contextual knowledge, and stakeholder relationships are critical, high turnover could jeopardize operational efficiency and impact.

### Key Supporting Data and Insights

To reinforce this policy motion, we present the following statistics and insights:

- 1. Effective Talent Management Drives Success:** Aligning talent management practices with organizational strategy and ensuring consistency across the system is crucial for attracting and retaining top talent. [MIT Sloan Management Review: Six Principles of Effective Global Talent Management](#)
- 2. Training Improves Retention:** Providing credible training can increase employee retention by 14%, as employees feel valued and perceive clear growth opportunities within the organization. [Wikipedia: War for Talent](#)
- 3. The High Costs of Turnover:** Replacing an employee can cost between 1.5 and 2.5 times their annual salary, factoring in recruitment, training, and lost productivity. [Wikipedia: War for Talent](#)
- 4. Employee Recognition Reduces Turnover:** Regular recognition of employee contributions can reduce job-hunting intentions by 33%, highlighting the importance of fostering a culture of appreciation. [Financial Times: The Power of Praise](#)

### Conclusion

Given these challenges and supporting data, FSC must prioritize talent attraction and retention as strategic imperatives. Strengthening employer branding, investing in training and recognition programs, and aligning talent management with FSC's mission will ensure the organization's ability to deliver its vital impacts on the world's forests and communities.

By adopting a proactive approach to employee engagement and retention, FSC can secure its position as a leader in forest conservation while creating a thriving and resilient workforce.

[19-2025\\_Final\\_Feasibility Assessment\\_SPA.pdf](#)

[19-2025\\_Final\\_Feasibility Assessment\\_ENG.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**19/2025**   **Enhancing FSC's Human Resource Practices to Strengthen Organizational Impact**

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

**1   ENVISAGED OUTCOME AND DELIVERABLES**

**1.1   Stated or Assumed Outcome**

- Attract and retain talent that are pivotal to FSC's success in its mission.
- Foster long term productivity, resilience and enhanced performance to propel FSC's mission.

**1.2   Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- Attract high performing talent into the organization;
- Increased retention of FSC's high performers;
- Increased overall performance of staff; and
- Increased innovation and relevance of FSC as a brand in the marketplace.

**2   FSC GLOBAL STRATEGY 2021-2026**

**2.1   Link to Global Strategy**

The Motion links to all three parts of the strategy as it relates to the workforce driving the strategic pillars.

**2.2   Contribution to Global Strategy**

Outcomes and deliverables directly contribute to the strategy. Without a motivated, fairly rewarded and sufficiently equipped workforce, FSC's ability to meet its mission and remain relevant in a competitive environment could be limited.

**3   CLARITY & SPECIFICITY OF THE MOTION**

- The implementation of this Motion may, in some instances, trigger compliance steps with the respective laws (such as the approval of a policy by the Works Council, where co-determination rights exist). The impact is a potentially longer planning and execution timeframe and/or additional costs.

**4   FEASIBILITY OF IMPLEMENTATION**

**4.1   Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☒ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☒ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

- N/A

### 5 BENEFITS / IMPACT

#### 5.1 Expected impacts of the motion

- Retention of high performing talent that drives excellence across the organization, wider environment and market.
- Strengthening of HR practices bringing fairness, transparency and more consistency to the organization
- A unified and inclusive work environment by establishing cultural norms and behaviors based on good, modern, current practices.

#### 5.2 Synergies with work underway:

- **Pathway to Operational Excellence** is multi-year transformational journey to operational excellence. The intention is to make a step change across operations in HR, Finance, Procurement, Legal and Technology.
- This project aims to modernize and utilize effective systems, policies and processes that save time and effort for everyone. Leveraging on a strong team and their wealth of experience, we will work towards enabling simpler, streamlined and clearer ways of working and thereby accelerating our ability to meet our FSC mission.
- The journey will have three phases:
  - i. *Assessment and diagnosis*: identifying which area needs prioritisation and what issues need solved for.
  - ii. *Fixing the fundamentals*: course correcting on what has been identified as problematic. This will involve embedding good practices into place, across all key processes, and operating models. Further, that we maximise on existing systems and resources to aiding efficiencies across Corporate Services
  - iii. *Modernizing and innovation*: Accelerating Corporate Services further to a highly efficient, automated and integrated way of working, focusing on the customer experience and providing real time data driven insights.
- For HR specifically, the assessment and diagnosis phase has been completed and action towards the development of a People and Culture strategy is underway. Work towards

enhancing talent attraction and retention and well as strengthening employee engagement and organizational culture has been commissioned and is underway.

- This project was launched at the end of March 2025 following Board approval at BM101.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

### 6.2 Motions 21

#### 6.2.1 Status

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

- Elements of Motions 21 are interconnected, particularly in relation to Human Resource management “including staff recruitment standards, required field of experience, training, staff evaluation, promotion... and dismissal”.
- These will be addressed in the ongoing Pathways to Operational Excellence Project that was approved by the Board.

## 7 IN A NUTSHELL

- This motion relates to FSC people who drive the mission. Developing a strategy to how FSC attract and retain high performing talent is timely as we approach our next strategic cycle. Work is already underway through the Pathway to Operational Excellence, which will address the desired outputs, deliverable and impact sought in this motion.
- In the adoption of this Motion, FSC shall respect and adhere to laws and regulations leading to rightful involvement of Works Councils, including their co-determination rights, as applicable, and all other compulsory employee rights.

### 7.1 Key open questions

- N/A

## 20/2025 FSC WAYS OF WORKING

Edited | Policy Motion

|                                  | Proposed By              | Seconded By      | Seconded By           |
|----------------------------------|--------------------------|------------------|-----------------------|
| <b>Name</b>                      | Jenny Stenberg           | Hubert Kwisthout | John Palmer           |
| <b>Organization / Individual</b> | Sveaskog Förvaltnings AB |                  | Palmer, John, Mr.     |
| <b>Chamber / Subchamber</b>      | Economic / North         | Social / North   | Environmental / North |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

We request that the FSC International Board work with the Secretariat to form a working group to analyse current organisational practices and make recommendations so that FSC will become more ‘fit for purpose’ as laid out in the global strategy.

The group shall be composed of members of the Secretariat, members from the global FSC network, FSC International members (sub-chamber balanced) and external consultants specialised in international business management. The group composition shall ensure a mix of deep understanding of FSC’s democratic system and external experts able to provide critical and unbiased review. The group shall work under the supervision of the FSC Board and report back to the FSC Board. The terms of reference for the working group should follow conventional procedures for reviews of international business managements and have special attention to the characteristics of FSC as a Big International Non-profit Non-Government Organization with a diverse chambered membership and wide range of clients in multiple jurisdictions.

### Time frame

The working group shall be established during the first half of 2026 and report back to the board in a timeline which will contribute positively to the revision of the FSC Global Strategy and implementation of the new Global strategy.

### Scope

The analysis shall include, at a minimum, recommendations for how the following can be secured:

1. A procedure and structures for **stakeholder dialogue** which includes certificate holders and regional representation **in the early stages of planned or anticipated policy changes and other relevant developments of the normative framework**. This should be supported by but not limited to points 2-4 below.
2. A **mandatory impact assessment and short- and long-term consequence analysis** for policy development and other relevant developments of the normative framework.
3. **Practical competence** and experience of operational activities as part of the FSC organisation and its processes.
4. **Proactive and interactive communication** with stakeholders, such as the members including certificate holders, to enable planning and preparation for participation on consultations and other critical events of the FSC system. Including timely communication of Secretariat decisions which may have major implications at national and Management Unit levels

## Background Information and Key Documents:

### Aim – Why this is needed

The aim is to secure that FSC, given its current size, importance and impact, develops to be fit for purpose in a rapidly evolving world. FSCs ways of working need to better safeguard professionalism and to enhance a perception of joint ownership of the system. A key factor to deliver this aim is to look at potential improvements in the way processes – that involve or have an impact on stakeholders, including certificate holders and other members – are designed and executed. Development work needs to include understanding of practical implication of new standards and procedures at certificate holders.

### Problem description

It is our contention that the rapid growth of FSC has led to a situation in which the organisation is insufficiently able to deal with the demands that its size and desired impact require. Among FSC Certificate Holders in different countries there is dissatisfaction with the way FSC IC handles the development, communication and the introduction in regard of new requirements in the form of directives, new standards, or consultations. This risks to cause damage to the FSC brand, limit the systems ability to grow and distract the members from the core purpose of better stewardship of the world's forests.

It should be emphasised that the motion doesn't want to disregard the important work that has already been done on the revised standard setting procedure FSC-PRO-01-001 but rather build on the learnings and the improvements that already happened!

The dimensions we need to address are further described by the following observed challenges

- **Stakeholder consultations** are sometimes not given adequate timeframe and lack enabling tools of satisfying quality for members to participate. (as example see below description of CNRA process in Sweden)
- **The quality of processes** does not always fulfil FSCs own procedure and guidance documents. (as example Swedish CRNA process non-conformity with FSC-PRO-60-006b)
- **Competencies involved** in process development, both internally in the FSC organisation or at consultant level, are not broad enough and often lack practical understanding of forest management and wood trade.
- As a third-party certification system, the FSC organisation needs preserve neutrality as a scheme owner and standard setter. This explains why FSC international has historically maintained limited direct contact with certificate holders regarding e.g. normative enquiries. However, today many certificate holders perceive that the FSC system develops with little understanding of the practical implementation and implications on the ground, in wood trade or in the forest. This means that new policy development in FSC is not meeting expectations of its members, especially certificate holders (CHs) as they did not involve the dimension of practical understanding of how the policy would play out on the ground.
- Despite our appreciation of many great professionals in the FSC organisation it is perceived that it requires large efforts in describing and explaining basic concepts of forestry and wood trade to speaking partners in the FSC organisation before it is possible to get to the actual topic of concern.
- **Impact analysis** of new developments or interpretations, including implications for certificate holders in affected geographies, are not carried out to adequate extent before new rules are implemented. (see example of Advice note on land conversion below)
- **Advice Notes** are perceived to be used as a kind of “fast track” for new developments in the FSC system. Advice notes are not perceived to be quality secured and are not transparent in a way that allows stakeholders to be engaged. This practice also makes it more difficult for the FSC International Board to keep an overview of new developments with high impact prior to their introduction.
- **Communication issues.** It is perceived by members to be difficult to keep oneself informed in advance and be prepared for critical activities such as consultations on policies with high business impact. And, when input has been given through consultations it is unclear how the information was understood or used by the WG or Secretariat to inform the outcome. Designated members perceive they are “drowned” with emails making it very time-consuming to identify and prioritise what is relevant in the information flow.

Two recent examples from Sweden by way of illustration:

- The advice note ADVICE-20-007-23 "Maximum hectare threshold for very limited portion," was released by the FSC Secretariat led to the conclusion that the majority of large landowners in the Nordic countries would immediately become non-compliant with the FSC FM standard due to the Advice Note's retroactive application when calculating Certificate Holder's conversion area towards the new 1000 hectare threshold. This caused a lot of stress to individuals and FSC certified companies with much negative effects for the FSC brand.
- In the centralized revision of the Controlled Wood Risk Assessment (CNRA) of Sweden the time frame allowed was insufficient. The questions asked did insufficiently address issues identified by certificate holders. The expert group used by the consultant did not have the relevant expertise and the understanding of critical dimensions of the Swedish forestry environment. The criteria by which the input of stakeholders was evaluated were unclear.

## Outcome - What we want to achieve

Further description of outcome aimed for through points 1-4 in the action request:

1. A procedure and structures for stakeholder dialogue which includes certificate holders and regional representation in the early stages of planned or anticipated policy changes.

→ Dialogue and involvement for input and assessment of possible impact and consequences shall happen regionally and centrally ensuring the right competences are involved. (Swedish: anchoring)

2. A mandatory impact assessment and short- and long-term consequence analysis for policy development.

→ These analyses should include communication with certificate holder representatives of all regions both proactively, early in the development process, and to test final versions of new policies prior to decision and release.

→ Consequence- and impact analysis should be a required component for FSCs internal decisions on new policies and transparently shared with members.

→ This should be applicable also for clarificatory instruments such as advice notes

3. Practical competence and experience of operational activities as part of the FSC organisation and its processes.

→ Biodiversity conservation, human rights and workers' rights, forest management and silvicultural competences are examples of competence needs of the FSC organisation. In all these areas BOTH theoretical competence / academic expertise AND practical experience is needed to support the connection between the FSC system at a policy level and the practical reality where the policies will play out.

→ Securing such inhouse practical experience should ensure that both national offices and the central organisation represent speaking partners for certificate holders and other practitioners that understand what such members are saying, hence facilitating communication and membership engagement.

→ The above improve communication and ensure the right competences get involved in new policy development and mitigate risk of unintended consequences of new policies or clarificatory instruments.

→ This should be secured through recruitment norms.

4. Proactive and interactive communication with stakeholders, such as the members including certificate holders, to enable planning and preparation for participation on consultations and other critical events of the FSC system. Including timely communication of Secretariat decisions which may have major implications at national and Management Unit levels

→ This communication shall not only happen e.g. by email (as an example of a channel that is rather facilitating one-way informing) but the secretariats or other units in each country/region arrange, as an example, quarterly meetings which include support to prioritisation between different activities according to relevance and capacity of different members.

→ This suggestion needs respect variations in capacity of regional offices and might entail more cooperation between the Bonn secretariat and the FSC global network. The need for facilitating bottom-up input to development must however not be neglected.

[20-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[20-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

[20-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[20-2025\\_FSC\\_ways\\_of\\_working\\_20250313122401\\_ENG\\_original.pdf](#)

[Annex 1 Technical suggestions as input to analysis.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**20/2025** FSC WAYS OF WORKING

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- FSC establishes a Board-supervised multi-stakeholder and sub-chamber balanced working group that analyzes organizational practices and provides recommendations to improve stakeholder dialogue.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- A working group is established in the first half of 2026 with balanced representation (Secretariat, members from the global FSC network, FSC International members (sub-chamber balanced) and external consultants).
- The group conducts its analysis with a scope focused on strengthening stakeholder dialogue by including certificate holders and regional representation in early stages of policy and normative framework changes.
- It also includes mandatory impact assessments for changes to the normative framework, communication with stakeholders and competence of FSC staff.
- Recommendations are submitted to the FSC International Board in time to inform the next Global Strategy.
- The motion is considered closed once the working group has reported back to the Board.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- The motion refers to the Global Strategy by aiming to deliver recommendations in time to inform its revision and implementation.

### **2.2 Contribution to Global Strategy**

- Goal 1.1: “Engage members and stakeholders to drive change as a community for co-creation of solutions”

## **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion defines a clear goal: a multi-stakeholder working group that will analyze FSC’s organizational practices and report recommendations to the Board.

- The scope centers on procedures and structures for stakeholder dialogue, ensuring early involvement of certificate holders and regional representation in policy and normative framework changes.
- The motion refers to FSC's ways of working in general, but the scope mainly lists topics that relate to the normative framework and policy development, leaving it unclear whether or not the full organization shall be analyzed.
- The motion does not specify how the group will operate, which may lead to misaligned expectations.
- It is also unclear what decision-making power the working group will hold (ex. whether its recommendations will be binding, advisory, or subject to further internal review).

## 4 FEASIBILITY OF IMPLEMENTATION

### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.4 (Pre)conditions for implementation

- Working group must ensure chamber-balanced composition and active participation from the Secretariat, Network, and Members.
- Formation of a cross-regional project team within FSC to oversee the execution.
- Allocation of sufficient budget and resources to hire qualified external experts.
- Engagement from FSC staff, members, and stakeholders during data collection phases to ensure comprehensive insights into organizational practices.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- The study will provide an inclusive (involving Secretariat, Network, Members, and external experts) evaluation of FSC's organizational practices, helping to identify potential areas for improvement.
- Potential to strengthen collaboration and enhance trust among members and stakeholders by addressing concerns about the effectiveness of FSC's processes.
- Potential risks include complex coordination of a diverse working group, resource demands from Secretariat and Network staff, and constrained timeline to deliver recommendations in time for strategy integration (by end of 2026).
- The longer-term impact depends on the scale of changes implied by the recommendations and the level of adoption decided by the Board.
- Depending on the scale of proposed changes and of adoption, the motion could lead to higher operational costs and extended timelines.

### 5.2 Synergies with work underway:

- Operational Excellence (details provided below)
- Implementation of the international standard setting procedures (details provided below)

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- Motion 21: Independent professional objective review of FSC operating systems to support the Global Strategy

### 6.2 Alternative 1: Operational Excellence (initiated March 2025)

#### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

#### 6.2.2 Description

- The Operational Excellence Project, initiated in March 2025 by FSC's Corporate Services, is a multi-year transformation initiative focused on modernizing systems and streamlining processes to enhance effectiveness. It aims to simplify daily operations, improve financial and procurement processes, and strengthen FSC's organizational culture. Given its focus on internal processes and ways of working, the project may overlap with aspects of the proposed Motion.

### 6.3 Alternative 2: Internal Study

#### 6.3.1 Status

- ☒ For potential consideration

- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

### 6.3.2 Description

- Instead of a multi-stakeholder working group, the assessment could be done internally. This would significantly reduce costs and timelines.
- The revised international standard setting procedure FSC-PRO-01-001 has newly introduced a stakeholder dialogue process before formal revision of requirements has started, additional guidance and emphasis on impact assessments as well as improvement of communication with stakeholders. Competence of staff is defined by requirements of the ISEAL standard-setting code to which FSC is compliant. Changes to the FSC-PRO-01-001 were based on an externally led consultancy and interviews with staff members and concluded in a white paper. If the emphasis of the analysis is on the normative framework, it would be better to e.g. evaluate the results of the implementation of the existing procedure to inform the next review and revision process rather than initiating an isolated new process.

**[Section 6.4 deleted]**

## **7 IN A NUTSHELL**

- The motion proposes a multi-stakeholder review of FSC's organizational practices to improve stakeholder engagement.
- The timeline is a major challenge, especially considering the number of stakeholders involved and the need for broad consultation.
- The impact will depend on the Board's willingness to act on the recommendations and the resources allocated for implementation.
- Existing initiatives like Operational Excellence and the option of an internal study present alternative approaches.

### **7.1 Key open questions**

- While the motion makes a case for improving FSC's organizational practices, the feasibility of the proposed timeline remains uncertain. Coordinating a diverse and balanced working group and ensuring meaningful stakeholder engagement within the intended timeframe is a challenge. It is also unclear what level of decision-making authority the group should hold (ex. whether recommendations would be binding, advisory, or subject to further internal review).

21/2025

## INDEPENDENT PROFESSIONAL OBJECTIVE REVIEW OF FSC OPERATING SYSTEMS TO SUPPORT THE GLOBAL STRATEGY

Accepted by MC | Policy Motion

|                                  | Proposed By      | Seconded By           | Seconded By      |
|----------------------------------|------------------|-----------------------|------------------|
| <b>Name</b>                      | Mike Bekin       | John Palmer           | Alan Smith       |
| <b>Organization / Individual</b> | Bekin, Mike, Mr  | Palmer, John, Mr.     | Smith, Alan, Dr. |
| <b>Chamber / Subchamber</b>      | Economic / North | Environmental / North | Social / North   |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

The FSC international Board of Directors will commission, assist and then evaluate and implement the results of an external, independent professional objective review of FSC's operational systems in order to improve efficiency and effectiveness. The review will cover all aspects of the organization, structure, technology, staffing and working methods of the Secretariat, Network, Board and global membership. The focus will be on the working systems, how FSC organises and carries out its multiplicity of tasks so that it can be made fit for purpose given the current and future challenges, such as climate change and increased traceability regulation.

Special attention will be given to human resources management, including staff recruitment standards; required field experience; training and retraining; programme and unit organisation and management, supervision, reporting, evaluation, promotion and dismissal. The review will consider how FSC members in the three chambers and sub-chambers can participate more efficiently and effectively, including through training in ISO quality assurance procedures. The review will make comparisons with other ISO-compatible schemes and ISEAL to draw examples which FSC could adapt for quicker evolution.

Attention will be given to the governance of FSC, and in particular to reduce the work load of the voluntary FSC Board, including the possible advantages of moving to or incorporating a paid professional Board.

The review will study and comment on the various ways of evolving FSC, including the General Assembly mechanisms and alternatives to the voting system as well as improvements to the motions and voting, building on the proposals by the Motion #09/2020 Working Group.

The review will examine and comment on the decision-making systems and balance of authority between Board, Secretariat, regional offices, independent national partners, certificate holders, ASI and ASI-accredited auditors, as well as the chamber-balanced membership.

The review will examine the relationships between the Board, Secretariat and satellite organisations such as Accreditation Services International, Investments & Partnerships, Indigenous Foundation, etc, for greater effectiveness and efficiency.

The review will study contexts and assess the problems, including those identified through structured surveys of FSC stakeholders. Options will be identified and preferred solutions justified. Recommendations will be presented to the membership with final decision on implementation resting with the Board.

The Board will facilitate the work of the external independent professional objective review, including interactions with stakeholders. The report will be studied by the Board and will be published promptly and widely, excluding only confidential annexes, but not their title, directed to the Board.

### **Background Information and Key Documents:**

A complex organisation does not necessarily need to be complicated. The EUDR alignment project has shown recently the value of multi-disciplinary coordination of effort across the silos of the FSC Secretariat. In spite of the commitment in the FSC Global Strategy 2021-2026 to streamlining and simplifying the central normative framework, much effort continues to be expended on developing complex rules and procedures. It is difficult for members to participate effectively in the evolution of FSC when there is little training of members in modern quality assurance procedures. Development of FSC is slow and cumbersome, as shown by the still incomplete transition from V4 to V5 of National Forest Stewardship Standards, begun after the approval of V5 of the FSC Principles and Criteria in early 2012. More recent developments in ISO-compatible quality assurance schemes for tropical agricultural products have shown that quicker and more agile development is possible without reduction in reliability. FSC still struggles to adopt new technologies which could facilitate this transition to a more streamlined way of working.

The structure and *modus operandi* of FSC, including the Secretariat, has changed little since the concept developed in 1993. In the last decade, the Board has become heavily overloaded with

operational issues and the division of work has become distorted as FSC has expanded. Senior managers have resisted previous attempts and requests for modernising FSC, resulting in a generalised lack of mutual engagement, ultimately leading to a stale organisation.

It is common, or is prescribed, that international organisations have external reviews of their non-financial operating systems at about 5-yearly intervals. FSC did have some kind of external scrutiny in 2008, possibly also in 2012, but any reports have not been published. This secrecy is detrimental to the trust of the subscribing members, certificate holders and other stakeholders, and bad for the international repute of FSC. Much needs to be changed, updated and become more open to innovation. This motion aims to bring external independent expert help to facilitate this much needed transition so that the next 30 years of FSC can be secured.

[21-2025\\_Final\\_Feasibility Assessment\\_ENG.pdf](#)

[21-2025\\_Final\\_Feasibility Assessment\\_SPA.pdf](#)

[21-2025\\_Final\\_Feasibility Assessment\\_FRA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**21/2025**

**Independent Professional Objective Review of FSC Operating Systems to support the Global Strategy**

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- An independent review of FSCs operational systems to improve efficiency and effectiveness
- The focus of the review will be:
  - i. All aspects of the organization
  - ii. Structure
  - iii. Technology
  - iv. Staffing – with special attention to human resource management
  - v. Working methods with the secretariat; including the balance of authority between Board, Secretariat, regional offices, national partners etc.
  - vi. Working methods with the network;
- Working methods with the Board – including reducing the workload of the Board and an assessment of moving/incorporating a paid professional Board.
  - i. Working methods with the global membership – including how the three chambers and sub chambers can participate more efficiently and effectively.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

An independent report that informs the Board of simpler and more efficient and effective ways FSC can operate across the entire organization, governing bodies and network. The intention is to use the findings to implement a step change that will yield efficiencies and better ways of working across FSC.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

The broad scope touches on all three strategic pillars.

### **2.2 Contribution to Global Strategy**

An independent report would support the organization in identifying and resolving blockers across FSC.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

This scope of this motion covers a wide range of areas, some outside the International Board's sphere of control. It would be helpful to clarify specific areas and the focus of those areas, to ensure a report that provides the detail to drive the desired efficiency gains.

## 4 FEASIBILITY OF IMPLEMENTATION

### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☐ 1 – 3 years
- ☒ More than 3 years

### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☒ More than 500.000 EUR

### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☒ More than 500.000 EUR

### 4.4 (Pre)conditions for implementation

An evaluation of this magnitude requires time and effort from a significant level of staff. It is important that the readiness/capacity of the team is assessed, to provide the desired outcome.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

Improved ways of working across FSC, its governing bodies and the network.

### 5.2 Synergies with work underway:

- **Pathway to Operational Excellence** is multi-year transformational journey to operational excellence. The intention is to make a step change across operations in HR, Finance, Procurement, Legal and Technology.
- This project aims to modernize and utilize effective systems, policies and processes that save time and effort for everyone. Leveraging on a strong team and their wealth of experience, we will work towards enabling simpler, streamlined and clearer ways of working and thereby accelerating our ability to meet our FSC mission.
- The journey will have three phases:
  - i. *Assessment and diagnosis*: identifying which area needs prioritisation and what issues need solved for.
  - ii. *Fixing the fundamentals*: course correcting on what has been identified as problematic. This will involve embedding good practices into place, across all key processes, and operating models. Further, that we maximise on existing systems and resources to aiding efficiencies across Corporate Services

- iii. *Modernizing and innovation: Accelerating Corporate Services further to a highly efficient, automated and integrated way of working, focusing on the customer experience and providing real time data driven insights.*

This project was launched at the end of March 2025 following Board approval at BM101. This project aligns with the Motion, specifically on Structure (of Corporate Services), Staffing and Technology.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

### 6.2 Alternative 1

#### 6.2.1 Status

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

Elements of Motions 19 relating to enhancing HR practices to strengthen organizational impact.

## 7 IN A NUTSHELL

This motion seeks an independent review that will examine multiple layers within FSC – internally, the Board, the membership and the network. The objective is to seek efficiencies and effectiveness across these different areas. A report of this size will need staff time in both the assessment and implementation phases and important the timeliness and or scope is understood before commissioning this review.

### 7.1 Key open questions

- What are the priority areas in each of the focus areas?
- What level of detailed is desired in each area?
- How will the changes be implemented for the independent network organisations?

22/2025

**INCLUDE SOLUTIONS FOR BIODIVERSITY AND CIRCULARITY AS FSC STRATEGIC PRIORITIES  
(2027–2032)**

Accepted by MC | Policy Motion

|                           | Proposed By       | Seconded By                         | Seconded By           |
|---------------------------|-------------------|-------------------------------------|-----------------------|
| Name                      | Fernando Martinez | Alina Liviet Santiago Jiménez       | Julia Young           |
| Organization / Individual | Chep España       | Santiago Jiménez, Alina Liviet, Ms. | HCV Network Ltd.      |
| Chamber / Subchamber      | Economic / North  | Social / South                      | Environmental / North |

**Policy Motion (Motion text / High-level action request):**

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

Incorporating biodiversity and circularity into FSC’s strategic priorities is critical for achieving its mission of ensuring healthy, resilient forests for future generations. Biodiversity strengthens ecological health and resilience, while circularity minimizes waste and resource dependency, reducing pressure on forests and advancing sustainability.

To lead in these areas, FSC must provide actionable, science-based solutions that help certificate holders meet emerging regulatory and market demands. These solutions will enable companies to build resilience, reduce resource volatility, and adapt to increasing timber demand while aligning with global biodiversity and circular economy frameworks. By expanding initiatives like the Restoration Toolbox and leveraging technology for data collection, FSC can enhance operational effectiveness while maintaining its mission-driven focus.

Recognizing biodiversity and circularity as top priorities for regulators, investors, and stakeholders, we should call for action to intensify efforts in promoting the development of impact-based solutions in these areas. We must accelerate the creation of practical, measurable tools and frameworks that support compliance with growing regulatory requirements. Additionally, we urge continued cross-learning sessions to develop the circular economy agenda further, fostering collaboration and

innovation across the FSC network.

This focused approach solidifies FSC's position as a global benchmark in forest stewardship and sustainability. Together, we can ensure regenerative ecosystems that strengthen forests, enhance carbon sequestration, and support livelihoods, delivering long-term value for certificate holders, stakeholders, and society. Let us seize this opportunity to reinforce our collective commitment to protecting forests and driving meaningful impact.

### **Background Information and Key Documents:**

This motion seeks to solidify biodiversity and circularity as strategic priorities within FSC, recognizing their critical role in addressing the interconnected challenges of forest resilience, sustainability, and climate change. Biodiversity is fundamental to maintaining healthy ecosystems and ensuring the regenerative capacity of forests, while circularity reduces waste and resource dependency, aligning with global sustainability and regulatory frameworks.

As the demand for timber is projected to increase significantly, FSC must lead by providing science-based, actionable solutions that enable certificate holders to adapt to market and regulatory demands. By expanding initiatives like the Restoration Toolbox and harnessing technology for streamlined data collection, FSC can reduce administrative burdens while fostering collaboration across its network. This approach enhances the organization's ability to support its members in meeting the highest environmental, social, and governance (ESG) standards.

The motion is timely, as regulators, investors, and society increasingly prioritize biodiversity preservation and circular economy principles. Strengthening FSC's focus in these areas will enable it to deliver greater value to certificate holders by enhancing resilience, ensuring access to sustainable resources, and fostering long-term environmental and social impact.

By advancing this vision, FSC can maintain its leadership as the global benchmark for forest stewardship. The proposed focus on biodiversity and circularity represents a transformative opportunity to create regenerative ecosystems that sustain livelihoods, enhance carbon sequestration, and ensure forests remain resilient for future generations.

[22-2025\\_Final\\_feasibility Assessment\\_ENG.pdf](#)

[22-2025\\_Final\\_Feasibility Assessment\\_FRA.pdf](#)

[22-2025\\_Final\\_Feasibility Assessment\\_SPA.pdf](#)

## **Final motion feasibility assessment, conducted by the FSC Secretariat**

22/2025

**Include Solutions for Biodiversity and Circularity as FSC Strategic Priorities (2027-2032)**

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

### **1 ENVISAGED OUTCOME AND DELIVERABLES**

#### **1.1 Stated or Assumed Outcome**

Biodiversity and circularity are recognized as strategic priorities in the Global Strategy 2027-2032. These priorities are reflected in expanded solutions and frameworks to meet regulatory and market demands and enhance FSC's effectiveness as the global benchmark for forest stewardship.

#### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- Biodiversity and circularity are included in the strategic pillars in the revised Theory of Change and the Global Strategy 2027-2032.
- Content from the Climate and Biodiversity Strategic Framework is included in the Global Strategy 2027-2032.
- FSC has developed and implemented tools and initiatives stemming from the Climate and Biodiversity Strategic Framework, as well as the Circularity Hub.
- Cross-learning sessions focused on circularity have been held across the FSC network.

### **2 FSC GLOBAL STRATEGY 2021-2026**

#### **2.1 Link to Global Strategy**

Not provided

#### **2.2 Contribution to Global Strategy**

While the motion is aimed at the Global Strategy 2027-2032 rather than the current Global Strategy, it contributes directly to Goal 1.4 "Expand the reach of FSC and its relevance in the fight against climate change and biodiversity."

### **3 CLARITY & SPECIFICITY OF THE MOTION**

The motion is specific regarding which topics it would like to have included as priorities in the Global Strategy 2027-2032 but leaves open the type of solutions that should be created and/or expanded.

### **4 FEASIBILITY OF IMPLEMENTATION**

#### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☐ 1 – 3 years
- ☒ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☒ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

Collaboration with consultants supporting the development of the Global Strategy 2027-2032 in 2025 and 2026, including developing the structure of its implementation, have already been engaged.

### 5 BENEFITS / IMPACT

#### 5.1 Expected impacts of the motion

- The proposed motion provides a clear focus for the future Global Strategy, which aligns with the decision to have a more focused, prioritized approach for the next strategic cycle. Inputs for the revised Theory of Change and Global Strategy 2027-2032 are being collected from members, the Board of Directors, and staff (including the FSC network), as well as external experts, in the first three quarters of 2025, with the revised Theory of Change to be approved by the Board of Directors at Board Meeting 103 in September 2025.
- A potential negative consequence would be if implementation of this motion would require the Global Strategy 2027-2032 to be revised, causing a delay in its approval, publication, and implementation.

#### 5.2 Synergies with work underway:

The motion builds on the existing development of the Climate and Biodiversity Strategic Framework as well as the development of the next Global Strategy.

### 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

#### 6.1 Connections to other motions:

None identified.

#### 6.2 Alternative 1

##### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

### 6.2.2 Description

Ongoing work to develop the Climate and Biodiversity Strategic Framework will include a Theory of Change and solutions to increase FSC's relevance in biodiversity conservation and circularity.

## 6.3 **Alternative 2**

### 6.3.1 Status:

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

### 6.3.2 Description

The development of the Global Strategy 2027-2032 began in early 2025 and will continue through 2026, the revision of the Theory of Change underpinning the Strategy planned to be completed by Q4 2025.

## 7 **IN A NUTSHELL**

- The motion is specific in identifying priority topics for the next Global Strategy, although the specifics of their implementation are left open-ended. Identification of the types of solutions and tools to implement these strategic priorities, should they be adopted, will fall to FSC International and the network.
- While ensuring that biodiversity and circularity are included in the Global Strategy 2027-2032 as strategic priorities could be completed by the end of 2026, when the Global Strategy is scheduled for approval and publication, implementation of these priorities will last the entirety of the strategic cycle, until the end of 2032.

### 7.1 **Key open questions**

None.

23/2025

**MOTION TO SECURE TRANSPARENCY AND FSC AC CONTROL ON INDEPENDENT ENTITIES****CREATED BY FSC**

Edited | Policy Motion

|                                  | Proposed By                        | Seconded By                   | Seconded By      |
|----------------------------------|------------------------------------|-------------------------------|------------------|
| <b>Name</b>                      | Carla Ximena Cárdenas Monroy       | Hubertus van Hensbergen       | Alan Smith       |
| <b>Organization / Individual</b> | Cárdenas Monroy, Carla Ximena, Ms. | van Hensbergen, Hubertus, Dr. | Smith, Alan, Dr. |
| <b>Chamber / Subchamber</b>      | Environmental / South              | Economic / North              | Social / North   |

**Policy Motion (Motion text / High-level action request):**

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

The FSC Board of Directors in no more than one year will conduct a governance review of existing independent entities: Investment and Partnerships, and the FSC Indigenous Foundation and will make the necessary adjustments to ensure the following:

*{This motion does not include Network Partners governed by members, with legal status in the countries where they have been created}*

1. The FSC Board of Directors must hold more than 51% of control of those entities.
2. Board positions beyond the 51% mentioned before, must be filled by members of the FSC AC who represent various sectors or chambers of the FSC membership. This ensures that all members of these entities' boards adhere to the FSC statutes, Global Strategy, Association Policy, and other relevant FSC Group rules.
3. These entities are required to comply with the statutes and FSC Group policies, and they must report their financial operations and activities to both the FSC International Board of Directors and the FSC General Assembly, including its impact on the FSC system and the FSC Global Strategy.

4. The Director General will have the authority to implement resolutions enacted by the FSC International Board of Directors regarding those entities. Additionally, the Director General will be responsible for overseeing these entities, and this role will be specified in the bylaws of the I&P and IF. However, the Director General will not be permitted to hold a seat on the boards of I&P and IF.

5. The FSC Board of Directors will not establish new third-party entities without ensuring that FSC AC maintains control over them. Any creation of a new entity must be consulted with the membership.

### **Background Information and Key Documents:**

Serious problems with independent entities created by FSC have been found:

#### **1.- Entities are not 100% owned by FSC and FSC Board of Directors does not have full decision-making power**

In recent years, the FSC Board of Directors has established two independent entities (so far as membership knows), with not even 51% of control and power to make decisions is held for FSC.

The FSC Secretariat seems to have more authority over these entities than the FSC Board of Directors, having a Board seat in those third entity's Boards contradicting the managing role that FSC statutes give the General Director.

There is a lack of information to the membership on the impacts and outcomes of these organizations, despite having been established more than five or six years ago.

### **Investments and Partnership governance**

Board of Directors composed of seven independent people (not members of FSC and therefore do not represent any chamber); one appointed seat for the FSC Secretariat (Co-chair of the Board of Directors), and one seat for a representative of the FSC Board of Directors. Board members of Investment and Partnership are not appointed by the FSC Board of Directors, they are appointed by the FSC Secretariat. According to the Art. VI of the I&P Articles of Incorporation, and Art. 3.5 of the I&P Bylaws, there is no clarity about who decides what kind of members, representation and profile of the members seated in I&P Board, giving then a blank check to the Secretariat to choose who is seated in the I&P Board.

### **FSC Indigenous Foundation Governance**

The FSC Indigenous Foundation also operates with a Board of Directors (a Council) composed of six independent members with no representation of indigenous organizations or indigenous communities in

the FSC system, no FSC members or chamber representatives, and again a seat is held by the FSC Director General.

This form of representation in the IF Governing Board has to be modified, since the mandate of the Director-General is to execute the mandate of the Board and not to represent it. In the new Foundational Act approved on November 10, 2024, the Council is linked with the PIPC, Indigenous Peoples Permanent Committee, however some members of the IPCC are not registered as members of FSC neither (according to the last public FSC list of members available in the FSC website).

In addition, the principles of organicity, representation and territorial connection that are essential in indigenous organizations have been ignored in the governance of the IF, which leaves this Foundation without a social basis in forest communities that participate in FSC and that have been for years in the system.

The governance of these organizations is not member based nor are they required to maintain chamber balance in their controlling structures.

Please see the annexes for more information.

## **2.- No financial transparency**

Since their inception, FSC has funded the operations of these entities. However, the FSC General Assembly has not yet been informed about fundraising outcomes, nor any financial information of these organizations' budgets, namely income and expenditure.

For example, the most recent publicly available information concerning FSC Investments & Partnerships finances is their 2021 tax filing to the IRS in the United States of America. There are not other documents available to the FSC Assembly of members.

## **3.- No accountability exists. Objectives and impacts are unclear**

There is no clarity on the mandate of these organizations and its need to comply with the FSC Statutes and contribute to the achievement of the Global Strategy or, at least, these have not been communicated to the members. In the case of FSC Investments & Partnerships, it was only recently made public that FSC Investments and Partnerships is developing the FSC system's Climate Change Strategy, a process in which members have had no knowledge and participation.

In the case of the Indigenous Foundation, it is worth asking whether it contributes to the increase in the participation of Indigenous Peoples in FSC (in number and quality of participation) and to the increase in

the certification of Indigenous Peoples' operations forests.

#### **4.- FSC policies are not binding**

It is important to note that these entities and their Board members of these independent entities are not required to adhere to FSC's policies, which include, but are not limited to, the following: 1) Transparency Policy; 2) Gender and Diversity Policy; 3) Network policy; 4) Partnership Policy; and 5) FSC Statutes; 6) Among other important policies and standards of the FSC system. Many of these problems are due to the governance of these organizations with which it was created, the fact that decision-makers are not members and the lack of legitimate representation.

These facts lead to significant reputational risk for FSC if these entities, which are trading on the FSC name, fail to meet FSC core principles related to the Policy for Association.

[EP 12,304 DE 10 DE DICIEMBRE 2024-FSC INDIGENOUS FOUNDATION-inscrita RP-13-12-2024\\_0 \(2\).pdf](#)

[Articles of incorporation I and P.pdf](#)

[Investments and Partnerships.pdf](#)

[Board IF.pdf](#)

[FSC I&P Bylaws\\_1.pdf](#)

[23-2025\\_Final\\_Feasibility Assessment\\_ENG.pdf](#)

[23-2025\\_Final Feasibility assessment\\_SPA.pdf](#)

[23-2025\\_Transparency\\_and\\_ensure\\_FSC\\_AC\\_controls\\_decisions\\_V1\\_20250313.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**23/2025** Motion to secure transparency and FSC AC control on independent entities

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

1. FSC Board of Directors hold more than 51 % of control over (a) the FSC Investment and Partnership entity (I&P) founded in the U.S. and (b) the FSC Indigenous Foundation entity (IF) founded in Panama.
2. Board positions must be filled by members of the FSC AC by representing interests or chambers of the FSC Membership.
3. It is ensured that the entities mentioned herein comply with their statutes plus FSC Group policies. They shall report on their financial operations and activities to the FSC Board of Directors and the FSC AC General Assembly, which shall include also reports on the impact to the FSC system and FSC's global strategy.
4. Resolutions enacted by the FSC Board of Directors are to be implemented via the Director General, who shall oversee these two entities but without holding a seat in the boards of I&P and IF.
5. No new legal entity will be created in the future without prior consultation of the FSC membership and without ensuring that FSC AC maintains control over them.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

1. Governance study revealing the status quo and options for adjustments within a year after the GA 2025.
2. Adjustments relating to I&P and IF are created, where needed, to ensure control is established or remains with the FSC Board of Directors.
3. Requirement established, where not yet established, that those entities report directly to the FSC AC Board of Directors and the FSC AC membership.
4. Requirement established that the creation of any new entity is dependent on a prior consultation of the membership while control shall remain with FSC AC represented by the FSC AC Board of Directors.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- None provided.

### **2.2 Contribution to Global Strategy**

- None provided. There is no clear contribution to a specific goal relating to FSC's global strategy. However, yearly activities conducted by FSC affiliated companies should ideally be aligned with such global strategy. I&P and IF are not founded with the intention to be active only locally, but to have a global impact in furtherance of FSC AC's mission. As affiliates are regularly funded by core members of FSC International, those activities can be steered by the FSC Secretariat via service and funding agreements, as well as cooperation & license agreements to appear on the market as being associated with FSC. With these

tools, the contribution to the global strategy can be ensured next to a supervision authority by the FSC Board of Directors.

### 3 CLARITY & SPECIFICITY OF THE MOTION

- Motion 23 has been amended and creates now more clarity with regards to which entities are targeted; in this instance, I&P and IF. It has also been enhanced by providing clarity on who shall have control over those 2 targeted entities and aims to describe the role of the Director General.
- The prior requirement of holding shares was adjusted by requiring now “control” by the FSC Board of Directors over those two entities. Control can be realized also without holding shares despite the fact that I&P and IF are no companies incorporated with shares. If and how exactly and in the best way is to be discovered via the feasibility study. This assessment can, however, not serve as a comprehensive feasibility study.
- Moreover, the amended version does not require any longer that the principles of membership organizations must be upheld. Due to the fact that I&P and IF are de facto and de iure no membership organizations and do not mirror FSC AC, only its mission, it would not have been possible.
- In order to ascertain how the Motion can be implemented concretely and effectively, a feasibility study is necessary to be conducted, which the Motion asks for to happen as an initial step in 2026. This is a prerequisite for any implementation, and such feasibility study may reveal further new insights.
- Although the study shall be conducted within one year, it is not fully clear by the Motion text if the implementation of appropriate measures shall be done within the same timeframe. Usually, the timeframe for the concrete steps of implementation is in the authority of the FSC Board of Directors and should therefore not fall in the same one-year timeframe, but to be agreed upon and steered by the FSC Board of Directors.
- Resolutions by the FSC Board of Directors are to be implemented by the Director General. This is a standard already arising out of the FSC AC Statutes and would not be necessary to be mentioned in this Motion. The Director General reports to the FSC Board of Directors and operates under the directive of the Chairperson as established by FSC AC. In other words, the Director General is the extended arm of the FSC Board of Directors for the operational business of FSC International.
- The Motion stipulates that the Director General oversees I&P and IF but without being permitted to hold a seat in their boards. The Motion is not clear what “oversees” shall mean and entail. Given that the Director General would in the future – based on this Motion – neither be a staff member nor a board or council member of I&P and IF, the influence would naturally be diminished, or in other words, the Director General would not be able to directly influence decisions and implement actions on behalf of the FSC Board of Directors on I&P and IF level. The Director General could, for example, be the connector and link between the FSC AC Board and the decision-making authority of I&P and IF, and oversee proper comm channels and serve as a messenger with regards to FSC Board of Directors decisions. But without formal authority, the Director General would have limited influence to realize compliance to FSC Board of Directors decisions and resolutions on I&P and IF level.
- As the Director General shall – based on this Motion – neither become a staff member nor board or council member of I&P and IF, a feasibility study needs to reveal first whether the role of the Director General can be included in the statutes and/or by-laws of I&P and IF as demanded by this Motion. Both I&P and IF are formally independent entities.
- Formally, if one or more members of the FSC Secretariat do not have direct influence on I&P and IF by not being a member of the board or other managerial authority of those entities, any changes to the statutes and/or by-laws of I&P and IF can only be realized by approval of the existing board or council members, yet not by the FSC Secretariat represented by the Director General.

- In case this Motion aims for having FSC AC Board of Directors exercising control over I&P and IF exclusively by becoming a board or council member and not by other means, it would require to assume all rights and obligations including liability aspects as effective board or council members by law. The local corporate and company laws need to be assessed if and how to realize such goal. Interestingly, the Motion does not speak about chamber balanced composition of the board or council for I&P and IF.

## 4 FEASIBILITY OF IMPLEMENTATION

### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.4 (Pre)conditions for implementation

- Full legal review of all corporate documents and governance tools in force and an assessment of options offered by U.S. as well as Panamanian corporate law.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- FSC International, which means FSC AC with all of its subsidiary companies, operates with a parent membership organization represented by the Board of Directors while the highest decision-making body is the General Assembly of its members. To execute the goals established by FSC AC, the worldwide activities can only be executed with legal entities operating worldwide in various jurisdictions. Network partners are usually membership organizations governed by their local laws and in close cooperation with FSC International having a three-chamber structure, yet legally fully independent from the FSC Group. Those network partners are excluded from this Motion. FSC GD and FSC IC, as well as FSC China and FSC Africa and henceforth FSC Ukraine are under full control of the FSC Board of Directors while shares or otherwise control are ultimately hold by FSC AC. All such entities form part of the FSC Group (one corporate family) – except for I&P and IF. I&P and IF appear on the market as closely associated with FSC International by being endorsed and having

obtained a license from FSC International contractually, but they operate independently by law.

- If it can be ensured that the FSC AC Board of Directors on behalf of the membership has full control over all entities created or to be created, it serves as a protection to the system that all activities can be steered by the Board and that the Board and membership are always updated through direct reporting.
- Nevertheless, certain corporate structures necessary to obtain non-profit tax-exempt status on local laws may not allow having shares or ownership by FSC AC or one of its other subsidiary companies. The amended Motion does, however, not require direct ownership, it allows and foresees proper “control” mechanism. This creates more flexibility while still ensuring influence and comprehensive reporting. With such influence, the mission and alignment with the FSC global strategy can be better ensured.
- Notwithstanding the foregoing, the mere fact that members of the FSC AC could become part of the managing authority of I&P and IF does not automatically mean that FSC’s policies and procedures are adhered to. This could only be realized by becoming part of the corporate FSC family, which cannot be realized for I&P and IF currently. Moreover, the role of a board or council member is guided by applicable local law and is a function of its own and such members would be required to adhere to local rules applicable to I&P and IF.
- Last but not least, not all FSC Group policies and procedures etc. can be adhered to and adopted 1:1 because influenced by local rights and obligations applicable only for I&P and IF.

## **5.2 Synergies with work underway:**

- Not identified.

## **6 ALTERNATIVES**

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### **6.1 Connections to other motions:**

- None.

## **7 IN A NUTSHELL**

- Motion 23 aims to ensure that FSC’s parent membership organization (FSC AC) gets and/or remains control over all entities already founded or to be created in the future, except the endorsed network partners on country-level, and the FSC Board of Directors with FSC AC’s membership receive accurate and comprehensive reporting from those entities and, moreover, that the activities are all in line with FSC’s global strategy. This approach can be seen as a safeguard that all entities in the system operate under one guidance achieving defined strategic goals without surprises and so that FSC AC’s mission is pursued in a uniform approach under consideration that FSC’s operations require multiple entities in different jurisdictions, which naturally have different legal status. As of now, only I&P and IF are not part of the corporate family called FSC Group, which operates on the market as FSC International. However, control may also be achieved without the requirement of FSC AC Board of Directors and other members of the FSC AC becoming a direct appointed member of the board or council of the I&P and IF.

### **7.1 Key open questions**

- What shall “overseeing I&P and IF” by the Director General entail? What is the concrete function of the Director General in relation to the board or other managerial authorities of I&P and IF?

- Is it a strict requirement that FSC Board of Directors next to other members of the FSC AC become board or council members of the I&P and IF or would it suffice if other means of control are realized so that the FSC Board of Directors have enough influence over and reports/data from I&P and IF?

## 25/2025 ENSURING & STRENGTHENING INTEGRITY IN FSC CERTIFICATION

Edited | Policy Motion

|                                  | Proposed By                       | Seconded By                | Seconded By                  |
|----------------------------------|-----------------------------------|----------------------------|------------------------------|
| <b>Name</b>                      | Lena Dahl                         | Markus Pfannkuch           | Jenny Wik Karlsson           |
| <b>Organization / Individual</b> | World Wide Fund for Nature Sweden | Precious Woods Holding Ltd | Svenska Samernas Riksförbund |
| <b>Chamber / Subchamber</b>      | Environmental / North             | Economic / North           | Social / North               |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

FSC shall investigate and present proposals on changing the consequences associated with not complying with FSC normative requirements. The investigation and its proposed actions shall be presented to FSC's Board of Directors, who will decide on which proposals to implement. The proposed amendments to the rules determining consequences and evaluation of non-conformities shall promote improvement and compliance. The investigation presented to the board shall include an impact assessment of the developed proposals, where certificate holders and other stakeholders are consulted in its development. Proposals resulting in changes to FSC requirements shall be implemented according to FSC-PRO-01-001 (Development and Revision of FSC Requirements), in a process that implies further opportunities for stakeholder consultation.

Topics that shall be included in the investigation are:

- How the grading of non-conformities and consequences associated with nonconformance can be revised to better account for the environmental, social and economic harm of a non-conformity[1]. Severe non-conformities that risk damaging the credibility of the FSC system, such as destruction of High Conservation Value forests, shall more easily render a major non-conformity and/or additional consequences beyond the existing ones.
- Strengthening requirements on corrective action of non-conformities, to include more control of the implementation of corrective action and specific requirements for root cause analysis[2]. The investigation should consider the more well-developed requirements on corrective action and

root cause analysis in ASI's finding procedure[3] as an source of inspiration.

- The threshold for when the number of major non-conformities result in a suspension of a certificate[4] and how this threshold can be amended to better account for the environmental, social and economic harm of non-conformities.

The motion applies to both Forest Management and Chain of Custody certification. The implemented changes resulting from the motion shall be aligned with ISO 17065[5]. The developed proposals shall account for the varying scale, intensity and risks associated with forest management activities of different certificate holders.

[1] Current requirements regarding grading and consequences of non-conformities can be found in FSC-STD-20-001 V5-0 EN (General Requirements for Certification Bodies), FSC-STD-20-007 V4-1 (Specific Requirements for Certification Bodies - Forest Management), Specific requirements for certification bodies - Chain of Custody (FSC-STD-20-011 V4-3).

[2] See previous reference for standards with requirements regarding corrective action of non-conformities.

[3] ASIs finding procedure outlines the process for identifying, managing, and responding to ASI Findings, such as non-conformities, issued by ASI to certification bodies in an assessment or complaint investigation. See link: [ASI-PRO-20-106-ASI Findings-V7.0\\_Effective on 14 July 2025](#)

[4] See clause 7.6.2e in FSC-STD-20-001 V5-0 EN (General Requirements for Certification Bodies).

[5] ISO 17065 is a standard for certification bodies, and all FSC-accredited certification bodies are required to comply with it. FSC has recently revised its normative requirements to ensure alignment with ISO 17065.

## Background Information and Key Documents:

### Purpose

To amend normative requirements governing consequences and evaluation of non-conformities, in order to promote improvement and compliance, and to reduce the risk of severe environmental and social harm.

### Link to strategy

The motion will contribute to goal 1.3 “*Enhance Verification and Integrity*” in FSC’s global strategy. By addressing pressing concerns that currently threaten membership engagement within the FSC system it

will also contribute to goal 1.1 “*Engage members and stakeholders to drive change as a community for co-creation of solutions*”.

### **General background**

While the FSC system undoubtedly contributes to more responsible management of the world’s forest, stakeholders and members continue to voice concerns over system integrity. Due to such concerns, founding members have dropped their FSC membership on international level, and countries with a long history of FSC certification and large areas of FSC certified forests, such as in Sweden, are experiencing major problems with membership engagement in the environmental chamber.

Problems with poor compliance and criticism of FSC’s system for control and sanctions are currently damaging FSC’s credibility in the market and have resulted in members leaving the system. To safeguard the system’s future credibility, FSC needs to act on these concerns, that not only are expressed by various social and environmental stakeholders but also are becoming increasingly vocal in the market. Otherwise, there is a risk that FSC network partners, that play the crucial role of developing national Forest Management standards, will see further reductions of its membership. Better compliance will strengthen FSC’s reputation as a credible standard for responsible forestry on the market, and thereby also benefit certificate holders that already today are performing well.

We acknowledge that the general requirements for certification bodies standard (FSC-STD-20-001<sup>[1]</sup>), which is highly relevant for the topic of this motion, has recently been revised in an accelerated process and will become effective in October 2025. The main change implies that certificate holders need to take immediate action to close minor non-conformities. We welcome this important change to the standard, which will strengthen system integrity. Nonetheless, we believe that this revision has failed to incorporate other important improvements that are highly needed to safeguard FSC’s future credibility.

### **Background on the challenges we want to address with this motion:**

#### **Consequences of non-conformities**

The severity of non-conformity in terms of the resulting social and environmental damage is poorly accounted for when determining consequences of a non-conformity. Certification bodies can, according to the general requirements for certification bodies standard (FSC-STD-20-001), issue a major non-conformity if the non-conformity affects the integrity of the FSC system (see clause 7.4.8b), but there is no guidance on which situations are considered critical to FSC’s credibility. Within the current system certificate holders that destroy several irreplaceable High Conservation Values forests might therefore only receive a minor non-conformity, if it does not reflect systematic failures within the certificate<sup>[2]</sup>. At the same time, other non-conformities with less practical importance are sanctioned too harshly and create an economic risk for certificate holders. Not all non-conformities are equally

important, and the FSC system currently risks focusing too much on various administrative requirements with little practical importance rather than on upholding good “on the ground” compliance with critical requirements. An example of this issue is the issuance of major non-conformities related to trademark use, even when they concern only minor graphical deviations or appear in documents not relevant to the FSC system, such as legally required financial reports. These errors do not entail any social or environmental risk. Nevertheless, major non-conformities are closely monitored by clients and can lead to economic consequences. In addition to this financial risk, reviewing such documents consumes considerable time during audits and prevents certification bodies from focusing on the core social and environmental aspects.

In summary, more stringent consequences are needed for severe non-conformities while consequences of non-conformities related to requirements that add little value can be softened. In general, this implies that normative requirements relevant for determining consequences need to be revised to better account for the risk and impact of a non-conformity. To better address severe non-conformities, FSC requirements could define some areas that are critical for the integrity of the FSC system, where a non-conformity more easily should be graded as major due to its severity, despite not being a systematic problem within the certificate[3]. Additional consequences beyond the existing ones might be introduced for such critical non-conformities. The development of credibility-critical indicators/high risk areas with more stringent consequences was previously suggested in FSC’s Certification Integrity and Credibility investigation[4] and is already applied by other certifications like Aquaculture Stewardship Council (ASC) for instances of forced labour and child labour[5]. Consequently, there are different alternative pathways and the investigation should determine the most feasible solution. We are however convinced that such changes are urgently needed to strengthen the reputation of the FSC system on the market, focus attention on critical areas and thereby reduce instances of severe social and environmental damage.

### **Corrective action to achieve lasting change**

Among its critics, including organizations that left the system, one of the most frequently voiced concerns about the FSC system is its inability to encourage learning and continuous improvement based on past errors. To promote lasting change, it is critical that non-conformities when identified are addressed with proper corrective action, targeting the root cause to the problem. Such root cause analysis also needs to examine the extent and scale of the problem identified to determine if it has occurred elsewhere. Surprisingly, the recently revised general requirements for certification bodies standard lacks specific provisions outlining how corrective action and root cause analysis should be carried out. This will most likely result in significant variation in implementation among certification bodies and increase the risk of misuse, such as instances where certification bodies “find” a new root cause to the same problem to avoid issuing a major non-conformity[6]. ASI’s findings procedure outlines

the process for identifying, managing, and responding to ASI Findings, such as non-conformities, issued by ASI to certification bodies in an assessment or complaint investigation. It includes well-developed requirements on corrective action and root-cause analysis<sup>[7]</sup>. ASI's finding procedure should therefore form a source of inspiration for the developed proposals on improving corrective action and root cause analysis.

In discussions with certification bodies, we have also heard that to promote lasting change more time during audits should be devoted to controlling areas with important non-conformities in relation to other mandatory tasks. For example, it can be challenging to find time to properly verify the closure of non-conformities in audits. Especially in situations where there are several non-conformities in an audit for which corrective action needs to be verified in the field. The investigation shall develop proposals on strengthening requirements regarding evaluation of non-conformities, giving certification bodies more time to reassure that corrective action is properly implemented.

### Thresholds for suspension

In a binary pass/fail system such as FSC, where all (or most) the market benefits come from being “just good enough” conformity thresholds for maintaining certification over time will have a large effect on overall compliance within the system. Currently five or more major non-conformities results in a suspension of a certificate within a short period of time, which was kept unchanged in recent revision of FSC-STD-20-001. This normative requirement applies to all types of certificates and does not distinguish at all between severe and less severe major non-conformities. The investigation should look into if this threshold is appropriate and if amendments are needed to promote compliance and better account for the severity of non-conformities in terms of environmental, social and economic harm.

<sup>[1]</sup> See link: <https://connect.fsc.org/document-centre/documents/resource/280>

<sup>[2]</sup> This is based on a complaint case in Sweden which exposed loggings of High conservation Value forests.

<sup>[3]</sup> See clause 5.2.4 in ASI's finding procedure for an example. <https://www.asi-assurance.org/sfc/servlet.shepherd/version/download/068S700000MatITIAR-7>

<sup>[4]</sup> See page 51 in Mike Read Associates (2020), FSC Certification Integrity and Credibility.

<sup>[5]</sup> See indicators 3.2.2 and 3.3.2 and Appendix 10 in the ASC farm standard. [ASC-STD-001-ASC-Farm-Standard-V1.0.1-Aug-2025.pdf](#)

<sup>[6]</sup> There has been such a case in Sweden resulting in ASI issuing major non-conformities to the responsible certification body.

[7] See clause 6.3 and 6.8–6.13 in ASI’s finding procedure. <https://www.asi-assurance.org/sfc/servlet.shepherd/version/download/068S700000Mat1TIAR-7>

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[25-2025\\_Ensuring\\_strengthening\\_integrity\\_in\\_FSC\\_certification\\_V1\\_20250313125111.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**25/2025** Ensuring & Strengthening Integrity in FSC certification

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

Foster continuous improvement in the certification system and enhance overall conformity with FSC requirements by submitting proposals to the FSC Board of Directors (for decision) outlining potential consequences for identified nonconformities, tailored to the type and severity of each issue.

### **1.2 Stated or Assumed Deliverables by which the Motion can be considered closed**

Proposals to change the potential consequences of nonconformities considering:

- Using a risk-based system with critical indicators/areas where consequences of nonconformities are related to the environmental, social and economic risk.
- Grading of critical nonconformities, including specified requirements for the application of root-cause analysis.
- The threshold for when the number of major nonconformities results in a suspension of certification and how this threshold can be amended to better account for the environmental, social and economic harm of non-conformities.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

1.3 “Enhance Verification and Integrity” and 1.1 “Engage members and stakeholders to drive change as a community for co-creation of solutions” in FSC’s global strategy.

### **2.2 Contribution to Global Strategy**

The motion scope falls into the goal 1.3 “Enhance Verification and Integrity,” in relation to improving control mechanisms thereby strengthening the overall integrity of the system. The motion outcome may also potentially relate to 1.1 “Engage members and stakeholders to drive change as a community for co-creation of solutions”.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

The motion is clear that the system for grading nonconformities and the consequences of nonconformities should be improved, especially for nonconformities where the risk to FSC integrity and credibility is high.

## **4 FEASIBILITY OF IMPLEMENTATION**

### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months  
☐ 6 months – 1 year  
☒ 1 – 3 years

☐ More than 3 years

**4.2 Estimated one-time costs:**

☐ Up to 10.000 EUR

☐ 10.000 to 100.000 EUR

☒ 100.000 to 250.000 EUR

☐ 250.000 to 500.000 EUR

☐ More than 500.000 EUR

**4.3 Estimated ongoing costs (per year):**

☒ Up to 10.000 EUR

☐ 10.000 to 100.000 EUR

☐ 100.000 to 250.000 EUR

☐ 250.000 to 500.000 EUR

☐ More than 500.000 EUR

**4.4 (Pre)conditions for implementation**

- Internal working group and/ or consultants to investigate and draft proposal for identification of critical nonconformities, risk-based consequences, consequences beyond suspension of certification in case of critical nonconformities and comparing it with the ISO requirements.
- FSC-PRO-01-001 does not apply to the development of proposals for submission to the Board of Directors. However, a consultation is to be conducted to gather feedback from relevant stakeholders, as required by the motion. The motion will be considered closed once the proposal has been submitted to the Board of Directors.
- The implementation of the Board's decision on the proposal would have process and financial implications, which are not covered in this assessment (see clauses 4.2 and 4.3).

**5 BENEFITS / IMPACT**

**5.1 Expected impacts of the motion**

- The motion aims to enhance the integrity of the system and thus the credibility of the system among members by having risk-based consequences for nonconformities.
- The implementation of a risk-based approach to consequences of nonconformities, along with other penalties beyond existing options of suspension, termination, blockage and disassociation of organizations could complicate the certification process and system and create challenges in providing effective assurance and oversight.
- Considering that the scope of the motion relates to formal consequences of not conforming with FSC requirements, the solution will include normative changes. Introduction of any normative change has to follow the timeline and process described in FSC-PRO-01-001, and in this situation is likely to be implemented as new advice notes or revising FSC-STD-20-001 V5-0, which becomes effective on 1 October 2025.

**5.2 Synergies with work underway:**

- Part of the motion, including the application of root cause analysis and nonconformity thresholds, has already been addressed through the recent revision of FSC-STD-20-001. The revised standard requires that even minor nonconformities be closed before certification can be granted or maintained. Failure to do so will result in certification not being granted or, in the case of existing certificates, suspension.

- The process of revision of complaints and appeals procedures (FSC-PRO-01-005 and FSC-PRO-01-008) is underway to be completed by the end of 2025 and it is expected to improve the process for considering the concerns of various stakeholder groups and strengthen FSC's reputation as a credible certification system.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

none identified.

### 6.2 Alternative 1

#### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

#### 6.2.2 Description

- The revised version of FSC-STD-20-001 V5-0 (effective from 1 October 2025) has already addressed the application of root cause analysis and nonconformity thresholds. A guidance document is planned to be produced during the transition period of the revised standard to help users understand the changes on nonconformity requirements and how to conduct a root cause analysis.
- FSC's scope of consequences for certificate holders for nonconformities with FSC requirements already includes suspension and termination of FSC certification, blockage in the FSC system and disassociating of FSC from certificate holders. Communication about the application of already existing sanctions as well as approaches on communicating stakeholder concerns can be improved by the Secretariat.

## 7 IN A NUTSHELL

- The motion implementation will enhance the integrity of the system and will make the system more stringent. A risk-based approach to introduce additional consequences, beyond the existing measures, could make the system too strict to implement and too complex to provide assurance and oversight.

### 7.1 Key open questions

- The motion is clear in requesting a review of the grading system for nonconformities. However, questions arise regarding the intended scope: does it call for shorter timelines to close critical nonconformities, or for an investigation of the consequences of each nonconformity? Likewise, the motion does not clarify what is meant by "softening the consequences" for nonconformities with lesser impact on the system.
- The motion requests a proposal to ensure certification bodies have sufficient time to verify the implementation of corrective actions (including root cause analysis). In practice, the FSC system does not restrict certification bodies to a fixed timeframe for evaluating the implementation of corrective actions. Regarding the threshold of five (5) major nonconformities for suspension of certification: the revised FSC-STD-20-001 retains this requirement but shortens the timeline for suspension. In addition, under the revised standard, even a minor nonconformity not closed within the specified timeframe can result in suspension. Therefore, the five-major-nonconformities threshold applies only in cases of a major systemic breakdown requiring immediate action.

## 26/2025 Strengthening FSC Auditor Expertise, Oversight and Accountability

Merged | Policy Motion

|                                  | Proposed by      | Seconded by         | Seconded By             |
|----------------------------------|------------------|---------------------|-------------------------|
| <b>Name</b>                      | Caroline Duhesme | Xiangjun Yang       | Edwige Eyang Effa       |
| <b>Organization / Individual</b> | ATIBT - Congo    | Yang, Xiangjun, Ms. | Eyang Effa, Edwige, Ms. |
| <b>Chamber / Subchamber</b>      | Economic / South | Social / South      | Environmental / South   |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025. The motion was merged with motion 27.**

✦ FSC shall **strengthen the requirements for competence, training and oversight applicable to FSC audits (FM, CoC, CW)**, particularly in high-risk areas, including in cases involving subcontractors or affiliate offices.

🔗 1. Strengthen thematic and contextual competence requirements for auditors involved in FSC audits, by providing for:

- ✅ Explicit consideration of expertise in the areas being assessed (environmental, social, forestry, etc.);
- 🌍 A requirement for contextual experience in high-risk areas;
- 👤 The use, where appropriate, of local experts.

🎓 2. Implement a structured and calibrated training system for FSC auditors, aligned with the requirements of FSC-STD-20-001 V5-0, including:

- 🔧 Practical modules adapted to the realities of the audited sites;
- 📄 A component on evaluation methods (documents, stakeholders, observations);
- 🔄 A requirement for periodic calibration between CBs, especially in high-risk countries.

🔗 3. Strengthen requirements for the supervision of subsidiaries, affiliate offices and subcontracted auditors,

including:

-  Making all subcontracting subject to a prior assessment of competence and capacity;
-  Requiring these individuals to participate in training and use the same internal procedures;
-  Ensuring their effective integration into CBs' internal quality control systems.

 **4. Use a scale / intensity / risk-based approach** for the implementation of the above-mentioned requirements, enabling efforts to be tailored to different contexts (e.g. smallholders, high-risk areas, types of audit, auditor experience and past performance).

 **5. Strengthen FSC's involvement in ASI governance**, in connection with Motion 31/2020, by:

-  Requiring effective implementation of the commitments from this motion;
-  Clarifying the competence requirements of ASI auditors;
-  Improving transparency of CB evaluations and suspension/correction processes.

## Background Information and Key Documents:

Audit quality is a fundamental pillar of FSC's credibility. However, weaknesses are observed: generalist auditors with no specific expertise, inconsistent interpretations, uncontrolled outsourcing. The use of poorly trained subcontractors or affiliate offices is common, especially in tropical timber-producing countries.

The FSC-STD-20-001 V5-0 standard, published in April 2025, already introduces notable progress (performance reviews, training duration, improved content). This motion proposes to complement and operationalize these changes to ensure their impact.

This motion merges the contributions of two previous texts:

-  **Motion 26:** competence, training, audit management
-  **Motion 27:** regulation of affiliates and subcontractors

It also builds on **Motion 31/2020** (normative framework for ASI), which still awaits full implementation.

This motion also reflects the spirit of **Motion 56/2021**, which proposed requiring — based on scale, intensity and risk — the inclusion of a specialized social auditor to rigorously assess the social dimensions of the FSC standard. Although that motion was not adopted, many members highlighted during preparatory meetings that it addressed a persistent weakness in the system. By integrating this concern into a broader approach to strengthening auditor competence and oversight, this motion aims to ensure better coverage of required expertise, particularly social, environmental and forestry.

By providing for a risk-based application, this motion aims for real impact, without harming the economic viability of certification. It seeks to strengthen the consistency of the FSC system, while recognizing the value of qualified auditors, rigorous CBs, and committed certificate holders.

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**26/2025**   **Strengthening FSC auditor expertise, oversight and accountability**

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

## **1   ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1   Stated or Assumed Outcome**

The competence and training requirements for auditors involved in forest management (FM), chain of custody (CoC) and controlled forest management (CFM) certification are improved. Further: the credibility of the FSC system is enhanced, by strengthening the requirements to monitor the entity providing outsourcing services to certification bodies and oversight by Assurance Services International (ASI).

### **1.2   Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- FSC has developed thematic and contextual competence requirements for auditors involved in FSC audits (FM, CoC, CFM) .
- FSC has established a structured and calibrated training system for FSC auditors.
- FSC has specified additional requirements for monitoring the entity providing outsourcing services to a certification body.
- The above solutions (competency and training of auditors and monitoring of outsourcing entity) are expected to be implemented using a risk-based approach (scale, intensity and risk).
- FSC has reinforced oversight mechanisms through ASI and ensures effective implementation of Motion 31/2020 through establishing the rules for competency of ASI assessors and making the ASI assessment and sanction mechanism more transparent.

## **2   FSC GLOBAL STRATEGY 2021-2026**

### **2.1   Link to Global Strategy**

(not provided)

### **2.2   Contribution to Global Strategy**

The motion does not directly contribute to a specific goal. Some contribution could be claimed towards 1.3 “Enhance verification and integrity”, but these goals have other intended outcomes.

## **3   CLARITY & SPECIFICITY OF THE MOTION**

- The motion acknowledges the changes introduced in FSC-STD-20-001 V5-0 regarding auditor qualification requirements. However, it is not clear whether the motion considers the changes to audit team requirements in Annex 3 of FSC-STD-20-001 V5-0 to be insufficient. The revised standard places emphasis on the audit team rather than individual auditors. Annex 3 specifies the competency requirements for audit teams according to audit type. In addition, Annex 4 introduces a risk-based approach that enables FSC to systematically assess and communicate integrity risks to certification bodies, and, where necessary, apply additional evaluation requirements based on the level and type of risk.

- The motion does not provide an assessment of potential shortcomings in the current training structure, in which training is delivered by accredited training providers.
- Similarly, the motion requests improvements to the requirements for monitoring entities providing outsourced services to certification bodies. However, it does not clarify whether the FSC and ASI requirements to monitor outsourcing are inadequate. The FSC certification bodies standard (FSC-STD-20-001) already includes monitoring requirements such as:
  - prohibiting subsequent outsourcing of activities,
  - prohibiting the use of the FSC trademark without FSC authorization,
  - requiring auditor registration with ASI and auditor performance reviews, and
  - requiring an annual audit by the certification body.

See annex for reference to ASI requirements regarding monitoring outsourcing (Affiliate Offices).

- Some parts of the motion such as improvements in ASI oversight mechanism can be explored with the implementation of Motion 31/2020.

## 4 FEASIBILITY OF IMPLEMENTATION

### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☐ 1 – 3 years
- ☒ More than 3 years

### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☒ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.3 Estimated ongoing costs (per year):

- ☒ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.4 (Pre)conditions for implementation

- A process including a working group for revising the qualification for both FM and CoC auditors, training methods and training requirements and revising the outsourcing requirements in FSC-STD-20-001 and FSC-PRO-20-004.
- Training specialist/consultant to review the existing training material, identify gaps and propose cost effective improvements in the training structure/design for auditor training programs in a way they can be hosted on relevant training platforms as well as provided in person.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- The proposed measures are suitable to achieve the intended positive outcome of a higher level of auditor competence, improved training structure and hence enhance audit quality.
- An unintended consequence of the motion could be that with strict or increased competency and training requirements for an FSC auditor the role of FSC auditors becomes less attractive, and it will lead to a further shortage of auditors.
- Introducing monitoring requirements beyond those already established by FSC and ASI may add complexity to the system, especially requiring every outsourcing entity subject to a prior assessment of competence and capacity rather than using a risk-based approach by ASI (see Annex). This is particularly relevant as affiliate offices (branches, subsidiaries, and outsourced entities) manage approximately 75% of FSC certificate holders.

### 5.2 Synergies with work underway:

- The motion builds on and has some overlap with work on Motion 31/2020 “The FSC Normative requirements for the operation of ASI”.
- The motion has some synergies with the revised FSC-STD-20-001 where the auditor competency requirements, auditor monitoring and performance evaluation requirements and auditor suspension requirements are clarified to enhance the quality of audits. Training content and duration for FM training is also revised in FSC-PRO-20-004 to ensure the quality of auditor initial trainings. Furthermore, enhanced monitoring of auditors happens via the ASI auditor registry and the introduction of an ASI auditor code of conduct.
- Similarly, regarding monitoring of outsourcing activities, FSC already has and continues to have stricter requirements in place than the relevant ISO 17065 requirements. There are existing ASI requirements according to which all CBs must demonstrate conformance with FSC requirements for subcontracting (see Annex). Furthermore, ASI auditor code of conduct is underdevelopment and expected to be completed by Q4 2025 and FSC License agreement with CBs, which were renewed 2024, includes reference to affiliated offices. All contractual rules count for affiliated offices; when a CB seizes accreditation, same counts for the affiliated office.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

(none identified)

### 6.2 Alternative 1

#### 6.2.1 Status

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

A new process needs to be set up for this revision to revise the qualifications for both FM and CoC auditors, training methods and training requirements and revising the outsourcing requirement in FSC-STD-20-001 and FSC-PRO-20-004. Some aspects of the motion could be

addressed in the context of work on Motion 31/2020 "The FSC Normative requirements for the operation of ASI" which is planned to be started later in 2025.

## **7 IN A NUTSHELL**

- The motion is specific in its ask what aspects of the FSC certification system should be improved but lacks assessment of how and why the existing requirements for qualification, accredited training and outsourcing are inadequate.
- While the proposed measures are suitable to achieve the intended positive outcome to enhance the audit quality but additional requirements beyond those already established by FSC and ASI may affect the availability of the auditors and may add complexity to the system and make the oversight difficult.

### **7.1 Key open questions**

See '3 CLARITY & SPECIFICITY OF THE MOTION'.

**Annex Existing ASI requirements according to which all CBs have to demonstrate conformance with FSC requirements for subcontracting**

**ASI NA -MA-20-100.**

13.2.2.iii. AOs may also be part of the initial Office Assessment as deemed necessary by ASI NA, depending on the nature of activities carried out by the AO and the extent of control exercised by the CAB.

13.2.2.iv. A CAB's key personnel shall be available to the Assessment Team during Office Assessments.

**ASI NA-MA-20-101-Accreditation-V2.0**

12.9 The CAB shall facilitate and cooperate in all ASI NA Assessments to ensure a constructive and professional Assessment environment. At minimum, the CAB shall:

12.9.2. Provide access to premises and documentation for all members of the ASI team. Such access shall also include AOs, if ASI determines this is necessary.

18.6.1. The CAB is required to provide evidence that it has access to sufficient resources to manage the geographical scope(s), including personnel, languages, Management Systems, AOs or subcontractors, arrangements to cover potential liabilities from Conformity Assessment Activities in the newly proposed countries, etc.

24.3. The CAB shall keep all required information fields related to their AOs updated in the ASI NA CAB Portal. Relevant changes (i.e. new offices and changes of the type of activities offices carry out) shall be entered within 30 days from the date the information has changed. Other information (such as number of certificate holders each office manages) can be updated annually, before the annual HO Assessment

**ASI PRO-20-258.**

9.8.3. The CAB shall have at all times written and legally enforceable arrangements with a) their clients (certificate holders and applicants for certification), b) Subcontractors/Affiliate Offices and c) all other entities and/or personnel involved in the certification activities carried out under this Agreement to ensure ASI has access to the client's site and relevant documents.

17.4.1. The CAB is required to provide evidence that it has access to sufficient resources to manage the geographical scope(s), including personnel, languages,

Management Systems, AOs, or subcontractors, arrangements to cover potential liabilities from conformity assessment activities in the newly proposed countries.

**ASI PRO-20-258.**

24.3 The CAB shall keep all required information fields related to their AOs updated in the ASI CAB Portal. Relevant changes (i.e., new offices and changes of the type of activities offices carry out) shall be entered within 30 days from the date the information has changed. (see 23.6. for more details in reporting changes).

## **Description of how ASI checks the FSC requirements**

The general ASI approach is as follows: CBs are requested to keep the ASI register of Affiliate Offices updated. Every time the CB adds an affiliate office into the register, such information will be reviewed by ASI as per internal work instructions. A decision as to whether an assessment to these AO needs to be allocated will be taken based on risk (type of office: branch, subsidiary or subcontractor, activities and number of CH), following ASI's annual CPR (annual CAB Performance Review) process.

Relevant normative requirements related to how ASI performs this oversight are listed below. ASI checks requirements during HO and AO assessments.

### **FSC-STD-20-001 V4-0 EN GENERAL REQUIREMENTS FOR FSC ACCREDITED CERTIFICATION BODIES**

#### **3.2 Outsourcing requirements.**

#### **ASI NA-PRO-20-113-Surveillance and Sampling-V1.0.**

6.1.2. Affiliate Offices (AOs) or Critical Office Locations: A representative sample of the offices or entities (other than the HO), either onsite or remote, where Key Certification Activities are performed or managed.

"Description for Affiliate Office or Critical Locations: Assessment of the CAB's locations performing or managing Key Certification Activities"

Sampling intensity: AO must have a Representative sample based on risks.

#### **ASI-PRO-20-101-Accreditation-V5.5**

14.2 Upon receipt of the completed checklists and documentation, ASI shall conduct (...) Office Assessment(s) (Head Office (HO) and Affiliate Office (AO)):

- i. Office Assessments include the review and evaluation of the implementation of the CAB's QMS and documented procedures. The aim is to determine the competence of the CAB to carry out the Conformity Assessment Activities in accordance with all Accreditation Requirements.
- ii. AOs are also subject to initial Assessment as deemed necessary by ASI. This depends on the nature of activities carried out by the AO and the extent of control exercised by the CAB.
- iii. A CAB's key personnel shall be available to the ASI Assessment Team during Office Assessments unless otherwise agreed with ASI.

17.4 Annual surveillance includes: 1) Assessment of HO and a sample of AOs;

19.6 For geographical scope extensions, the following process shall be applied: 19.6.1 The CAB is required to provide evidence that it has access to sufficient resources to manage the geographical scope(s), including personnel, languages, Management Systems, AOs or subcontractors, arrangements to cover potential liabilities from Conformity Assessment Activities in the newly proposed countries, etc.

#### **ASI-PRO-20-260-ASI Oversight-V1.2**

5.3 The ASI Oversight Plan shall cover a sample of activities representative of the CAB's Scope of Approval or Accreditation, considering the CAB's past conformance patterns, as well as the risks associated with the activities, location and personnel of the CAB.

28/2025

## ENSURE THE INTEGRITY OF THE FSC REMEDY FRAMEWORK IMPLEMENTATION TO PROTECT FSC'S CREDIBILITY

Edited | Policy Motion

|                                  | Proposed By               | Seconded By                         | Seconded By            |
|----------------------------------|---------------------------|-------------------------------------|------------------------|
| <b>Name</b>                      | Gemma Tillack             | Alina Liviet Santiago Jiménez       | Dirk Riestenpatt       |
| <b>Organization / Individual</b> | Rainforest Action Network | Santiago Jiménez, Alina Liviet, Ms. | Riestenpatt, Dirk, Mr. |
| <b>Chamber / Subchamber</b>      | Environmental / North     | Social / South                      | Economic / North       |

### Policy Motion (Motion text / High-level action request):

*Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.*

***This motion proposes enhancements to FSC Remedy Framework implementation for disassociated companies.***

To strengthen the integrity and rectify current failures, enhancements and improvements are made to the implementation of the FSC Remedy Frameworks, and associated supporting architecture, for processes involving Corporate Groups that have caused 'outstanding magnitude or gravity of harm' (those subject to FSC Advice Note ADVICE-10-004-01) [\[1\]](#) In particular, improvements 1 - 8 must be realised prior to verification of the "association threshold", ending disassociation and creating eligibility to re-enter the certification scheme.

1. Mechanisms and resources shall be in place so that affected communities can access training, knowledge exchange, and support from groups and experts that they trust prior to field visits by Independent Assessors, finalization of the identification of Impacted Rights Holders, Impact Areas and Social and Environmental Baseline Assessments and during further steps in the remedy process.
2. FSC publishes both the methodology used and the summary results [\[2\]](#) of credible assessments undertaken to confirm the extent of entities in Corporate Groups subject

to the FSC Remedy Frameworks. In instances of large and high- profile Corporate Groups that pose a high reputational risk for FSC (those subject to FSC Advice Note ADVICE-10-004-01), the assessment should be carried out by an independent party and stakeholders notified and given the opportunity to provide feedback.

3. FSC shall define and publish the method used to ensure the absence of conflicts of interest in appointed Independent Assessors and Third Party Verifiers and oversee their performance. A summary of the results of conflict of interest assessments undertaken by the FSC will be published prior to appointment.
4. Corporate Groups implementing the Remedy Framework shall use the “Free, Prior and Informed Consent (FPIC) Implementation in the FSC Remedy Framework Guide, Indicators and Methodology” [3], at all stages where FPIC is required, and when ‘Remedy Learning Requests’ are made by Third Party Verifiers, the actions required are undertaken before remedy processes proceed to the remedy planning stage.
5. Third Party Verifiers shall use the FPIC indicators listed in the “Free, Prior and Informed Consent (FPIC) Implementation in the FSC Remedy Framework Guide, Indicators and Methodology” to verify processes undertaken by the Corporate Group and Independent Assessors.
6. Corporate Groups shall have methodology review mechanisms, which include review by Impacted Rights Holders, Affected Rights Holders, Independent Experts, and Interested Stakeholders, and Third Party Verifiers shall confirm that these mechanisms are in place and inputs have been integrated to methods prior to use.
7. Third Party Verifiers shall ensure the accuracy of maps and inventories of Impact Areas and the harms caused by conversion and/or unacceptable activities with Impacted Rights Holders, Independent Experts and Interested Stakeholders. If additional Impact Areas or harms are identified, these areas need to be considered during the verification process, and before the Impact Area and Harm Analysis Report is finalized.
8. FSC shall ensure there is an independent, accessible and resourced grievance mechanism within FSC to receive and address complaints about the implementation of the Remedy Frameworks by disassociated companies. To ensure accessibility, processes and information should be made available by the FSC in the local languages spoken by affected communities in all regions where the Frameworks are being implemented.
9. FSC’s work plan for 2026-2029 shall ensure development of minimum requirements for methodologies for:
  - Impact area identification and the assessment of loss of HCVs in that area
  - Social and Environmental Baseline Assessments
  - Review mechanisms

Best practice for the development and implementation of the methodologies requires the use of independent experts, and involvement of Impacted Rights Holders and Interested Stakeholders.

These improvements shall be prioritised and progressively integrated to ensure affected communities maintain timely access to remedy. FSC shall reflect these improvements and learnings from the actions above using technical clarifications, guidance, or interpretations or advice notes, and, ultimately, into future revisions of the FSC Remedy Frameworks according to the standard revision schedule set by the Secretariat.

[1] Motion 28 recognizes the need for a distinction in how FSC applies remedy processes for *Corporate Groups* that are disassociated from FSC and have caused ‘outstanding magnitude or gravity of harm’ as defined using FSC Advice Note 10-004-01, and others such as existing FSC certified companies. Through ensuring these improvements in the Remedy Framework are implemented by these large, historically harmful *Corporate Groups* prior to ending their disassociation with FSC (“association threshold”), it both doesn’t prevent existing certificate holders progressing with the remedy processes and helps protect FSC’s reputation and build stakeholder trust in the eligibility for association with FSC.

[2] Summary reports shall include the results of assessments on all factors of control used to define Corporate Group.

[3] [https://connect.fsc.org/sites/default/files/2025-07/FPIC\\_Indicators\\_Draft0.pdf](https://connect.fsc.org/sites/default/files/2025-07/FPIC_Indicators_Draft0.pdf)

## Background Information and Key Documents:

**Purpose.** This motion aims to rectify current failures in the implementation of the FSC Remedy Framework by companies that have been disassociated from the FSC through priority interventions that enhance implementation efforts and increase oversight by the FSC.

**Global Strategy.** This motion contributes to the FSC Global Strategy which aims to ‘*develop FSC solutions to help halt deforestation, grow the world’s forest area and improve its quality, including forest conservation as well as restoration of degraded or converted areas to more natural conditions*’ and ‘‘ and ‘*scale up benefits for Indigenous Peoples, communities, smallholders and workers*’ by ensuring integrity in the remedy processes undertaken by Corporate Groups that are seeking to end disassociation and gain FSC certification for lands converted between 1st December 1994 and 31st December 2020.

**Further information.** Serious concerns have been raised by affected communities, interested stakeholders and FSC members on the lack of the capacity building and proper FPIC processes during the implementation of the FSC Remedy Framework by two disassociated Corporate Groups—Royal Golden Eagle/APRIL Group and Asia Pulp and Paper (APP) Group—in Indonesia. Evidence has been published of ongoing environmental and social harms by these Corporate Groups. Clear and substantial evidence has also been published demonstrating inaccuracies in the current lists of entities that are under the control of the Royal Golden Eagle/APRIL Group<sup>[1]</sup> and APP/Sinar Mas Group<sup>[2]</sup> that have been determined by the FSC. There have been significant failures in the selection of independent assessors with reported conflicts of interests. NGOs and other parties have repeatedly raised concerns about the implementation of the Remedy Framework to the companies involved, Independent Assessors, and the FSC but these concerns have not been addressed. As there is no agreed FSC hosted grievance procedure to receive such grievances, and the failure of the companies to address grievances submitted to the company's own grievance processes, FSC members and NGOs have been obliged to send letters of concern directly to the FSC Board of Directors and Director General and to propose this motion.

[1] <https://connect.fsc.org/sites/default/files/2024-10/APRIL%20corporate%20group%20list%20-%20October%202024.pdf>

[2] <https://connect.fsc.org/media/app-corporate-group-list-july-2024>

Papering Over Corporate Control [https://www.greenpeace.org/static/planet4-canada-stateless/2022/10/ddb2bafa-report\\_papering\\_over\\_corporate\\_control.pdf](https://www.greenpeace.org/static/planet4-canada-stateless/2022/10/ddb2bafa-report_papering_over_corporate_control.pdf)

Deforestation Anonymous <https://www.greenpeace.org/static/planet4-international-stateless/2024/03/3fb4c6b2-deforestation-anonymous.pdf>

Pulping Borneo <https://www.greenpeace.org/international/publication/59879/pulping-borneo/>

Under the Eagles Shadow <https://www.greenpeace.org/international/publication/74651/under-the-eagles-shadow>

Challenges for the FSC Remedy Framework Social Baseline Assessment Process Case Study <https://www.forestpeoples.org/publications-resources/reports/article/challenges-for-the-fsc-remedy-framework-social-baseline-assessment-process-case-studies/>

APP Sinarmas: Promises Pulped. [https://www.greenpeace.org/static/planet4-international-stateless/2023/10/5267ad2c-app-10-year-report\\_241023\\_rev.pdf](https://www.greenpeace.org/static/planet4-international-stateless/2023/10/5267ad2c-app-10-year-report_241023_rev.pdf)

APP Old Habits Die Hard <https://environmentalpaper.org/wp-content/uploads/2025/09/APP-Old-Habits-Die-Hard-September-2025.pdf>

[Papering Over Corporate Control\\_October2022.pdf](#)

[Deforestation Anonymous.pdf](#)

[PulpingBorneo\\_052023.pdf](#)

[FP-5345 FSC Remedy\\_v6 FINAL.pdf](#)

[APP Forest Promises Pulped.pdf](#)

[FPIC\\_Indicators\\_Draft0.pdf](#)

[28-2025\\_Remedio\\_Framework\\_Implementation\\_V1\\_20250313122547.pdf](#)

[28-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[28-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[28-2025\\_Final\\_Feasibility\\_Assessment\\_FRA\\_0.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

28/2025

**Ensure the integrity of the FSC remedy framework implementation to protect FSC's credibility**

Accepted by the Motions Committee as:

☐ Statutory motion

☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

Enhancements and improvements are made for implementation of the FSC Remedy Frameworks, and associated supporting architecture, for processes involving Corporate Groups that have caused 'outstanding magnitude or gravity of harm' (those subject to FSC Advice Note ADVICE-10-004-01).. FSC utilize technical clarifications, guidance, or interpretations or advice notes, and revisions of the FSC Remedy Frameworks to accomplish the motion. FSC requires Corporate Groups that have caused 'outstanding magnitude or gravity of harm' to implement these requirements prior to verification of the "association threshold" for ending disassociation.

..

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

1. Deliverable 1: FSC puts mechanisms and resources in place to train and support affected rights holders prior to Independent Assessors going to the field, prior to the finalization of identification of Impacted Rights Holders, prior to identification of Impact Areas and prior to completing the social and environmental baselines assessments and in other key milestones of the remedy process.
2. Deliverable 2: FSC publishes both the methodology used and the results of credible assessments undertaken to confirm the extent of corporate groups subject to the FSC Remedy Frameworks. Deliverable 3: In large and high-profile corporate groups, the assessment is carried out by an independent party and stakeholders are given the opportunity to provide feedback.
3. Deliverable 4: FSC defines and publishes its method to ensure the absence of conflicts of interest in appointed Independent Assessors and Third Party Verifiers. Deliverable 5: FSC defines and publishes its method to oversee the performance of Independent Assessors and Third Party Verifiers. Deliverable 6: FSC publishes conflict of interest assessment summaries prior to the appointment of Independent Assessors and Third Party Verifiers.
4. Deliverable 7: FSC requires Corporate Groups implementing the Remedy Framework use the Free, Prior and Informed Consent (FPIC) Implementation in the FSC Remedy Framework Guide, Indicators and Methodology in all stages where FPIC is required. Delivery 8: FSC requires Corporate Groups to resolve "Remedy Learning Requests" related to FPIC issued by Third Party Verifies before proceeding to the remedy planning stage.
5. Deliverable 9: FSC requires Third Party Verifiers use the FPIC indicators listed in the ["Free, Prior and Informed Consent \(FPIC\) Implementation in the FSC Remedy Framework Guide, Indicators and Methodology"](#), to verify processes undertaken by the Corporate Group and Independent Assessors.
6. Deliverable 10: FSC requires Corporate Groups to have methodology review mechanisms that include review by Impacted Rights Holders, Affected Rights

Holders, Independent Experts and Interested Stakeholders. Deliverable 11: Third Party Verifiers confirm the methodologies are in place and inputs from the reviews are integrated prior to the implementation of the methodology.

7. Deliverable 12: FSC requires Third Party Verifiers to ensure the accuracy of maps and inventories of Impact Areas and harms caused by conversion and unacceptable activities with Impacted Rights Holders, Independent Experts, and Interested Stakeholders. If additional Impact Areas or harms are identified, these areas need to be considered during the verification process and before the Impact Area and Harm Analysis Report is finalized.
8. Deliverable 13: FSC ensures independent, accessible and resourced grievance mechanism within FSC to receive and address complaints about the implementation of the Remedy Frameworks by disassociated companies. Deliverable 14: FSC ensures information and processes are made available in the local languages spoken by affected communities in all regions where the Remedy Frameworks are being implemented.
9. FSC's work plan for 2026-2029 shall ensure best practice development of minimum requirements for methodologies for:
  - Deliverable 15: Impact area identification and the assessment of loss of HCVs in that area
  - Deliverable 16: Social and Environmental Baseline Assessments
  - Deliverable 17: Review mechanisms

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- Strategy 2.4: Scale up benefits for Indigenous Peoples, communities, smallholders and workers
- Strategy 1.3 Enhance verification and integrity

### **2.2 Contribution to Global Strategy**

- This motion contributes to the FSC Global Strategy which aims to 'develop FSC solutions to help halt deforestation, grow the world's forest area and improve its quality, including forest conservation as well as restoration of degraded or converted areas to more natural conditions' and 'scale up benefits for Indigenous Peoples, communities, smallholders and workers' by ensuring integrity in the remedy processes undertaken by Corporate Groups that are seeking to end disassociation and gain FSC certification for lands converted between 1st December 1994 and 31st December 2020.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion language is clear on the expectations and deliverables.
- The motion is prescriptive in defining the process and tools to achieve the desired outcomes.

## 4 FEASIBILITY OF IMPLEMENTATION

### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☐ 1 – 3 years
- ☒ More than 3 years

### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.4 (Pre)conditions for implementation

- Expert in baseline methodology review mechanisms delivers indicators for minimum requirements
- Expert in assurance models to support FSC in assessing technology solutions, operations and systems (free of conflict of interest) for qualifying, supporting and overseeing performance of Independent Assessors and Third Party Verifiers to deliver a recommendation for implementation. (See number 3, deliverable 5)
- 0.5 FTE (full time equivalent) for 2 years to work with an expert training organization to deliver the concept, identify needed partnerships, develop the business and financial plan and implement a remedy training mechanism for affected rights holders, NGOs, CSOs and local governments and associations (.5 staff person already planned in 2026, so a net addition of .5 FTE over 2 years).
- 0.5 FTE (full time equivalent) ongoing to oversee remedy training mechanism. (Likely to start in 2027)

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- The motion contains specific activities and deliverables making the determination of the conclusion of the motion easy to measure.
- The motion contains 17 deliverables to apply to current and ongoing remedy processes implemented by Corporate Groups.

- The motion is narrowly tailored to increase the requirements and activities in remedy processes only for Corporate Groups that are subject to ADVICE-10-004-01 and is likely cause significant delays in the implementation.
- To deliver this motion, FSC will need to make significant investments over the next three years in technology to support remedy verification, improvements to the Third Party Verifier assurance model, the establishment of a remedy training mechanism, and improved operations.

## 5.2 Synergies with work underway:

- Remedy train the trainers project planned 2026 - 2027 to develop a concept, business plan and implementation plan for delivering training to Affected Rights Holders in FSC remedy processes. (See deliverable 1)
- FSC will publish practical guidance on determining the corporate group according to the scope of control defined in the Policy for Association V3 in Q4 2025. (See deliverable 2)
- FSC will publish an operational summary of its conflict-of-interest review in Q4 2025. This does not include publication of the conflict-of-interest assessments. (See deliverable 4)
- Development of a technology solution to support verification, planned 2026. This does not include the Third Party Verification methodology for oversight of performance. The motion would require prioritizing of this methodology and any related systems. (See deliverable 5)
- Technical working group to deliver FPIC guidance for implementation in the FSC Remedy framework including Indigenous Peoples' perspectives, diverse geographical perspectives, and diverse forest regions, work planned for 2026. (See deliverable 9)
- The FSC Complaints and Appeals Procedure is currently under revision. Accessibility of the procedure to rights holders, additional languages, and the inclusion of the FSC Remedy Frameworks are included in the revised version. (See deliverable 13)
- Technical working group to deliver HCV methodology for past loss and destruction, HCV expert, GIS expert, work planned for 2026. (See deliverable 15)

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- No connections identified. >

### 6.2 Alternative 1 (number 7)

#### 6.2.1 Status

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

The Remedy Framework in Chapter 3, Section 7.3 and Section 13.2 already requires Third Party Verifiers to check the accuracy of mapping of Impact Areas and the cases for remedy of harm to be in consultation with Impacted Rights Holders, Affected Stakeholders and Independent Experts. The contribution of the motion is adding clarification on what the Third Party Verifier is to do in case additional impact areas or harms are flagged in consultation. This could be achieved through technical clarification.

## **7 IN A NUTSHELL**

- The motion is clear, implementable, and closure of most of the motion deliverables are measurable. The motion increases the actions and requirements for corporate groups subject to ADV-10-004-01 and is likely to significantly increase implementation timelines for those companies. The motion will require FSC to invest more and accelerate timelines for some systems and solutions already foreseen.

### **7.1 Key open questions**

- What consequences will this motion have on the timeframes and outcomes of current remedy processes being implemented by Corporate Groups?
- What consequences will deliverables 13 and 14 have on the current revision process of the FSC Complaints and Appeals procedure?

29/2025

## STRENGTHEN SYSTEM INTEGRITY BY IMPROVING PROCESSING FSC® POLICY FOR ASSOCIATION COMPLAINT FSC-PRO-01-009 V4-0 PROCEDURE

Edited | Policy Motion

|                                      | Proposed By                                 | Seconded By         | Seconded By                   |
|--------------------------------------|---------------------------------------------|---------------------|-------------------------------|
| <b>Name</b>                          | Apolinar Tolentino                          | Manoj Sahu          | Subash Chandra Swain          |
| <b>Organization /<br/>Individual</b> | Building and Wood Workers'<br>International | Sahu, Manoj,<br>Mr. | Chandra Swain,<br>Subash, Mr. |
| <b>Chamber /<br/>Subchamber</b>      | Social / North                              | Economic /<br>South | Environmental / South         |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

The FSC Board of Directors shall improve the current Processing FSC® Policy for Association Complaints FSC-PRO-01-009 V4-0 EN Procedure by including but not limited to:

1. Replacing the Scope in the Procedure to ensure the ability of rights holders and affected stakeholders to directly file Complaints against an Organization related to the six unacceptable activities of the FSC Policy for Association that overlap with certification requirements through PfA Complaint Procedure FSC-PRO-01-009 instead of ordinary route for dispute resolution as defined in respective certification requirements and FSC-PRO-01-008 Processing Complaints in the FSC Certification Scheme.
2. In the Preconditions for initiating the process for ending disassociation (Annex 4) before entering into a formalized engagement with FSC:
  - a. The disassociated organization shall demonstrate commitment to fair and good faith bargaining to achieve fair compensation.
  - b. The disassociated organization shall refrain from any retaliation, intimidation or criminalization against rights holders or stakeholders.

## Background Information and Key Documents:

### Problem Statements

The *Policy for Association* serves as a risk management tool for FSC, protecting the credibility and reputation of the FSC brand and organizations *associated* with it. If a potential violation of this policy is brought to the attention of FSC, then FSC-PRO-01-009 *Processing FSC Policy for Association Complaints* is applied, whereby FSC will assess multiple options, from mediation to investigation, sanctions and conditions-setting, to improve the performance of individuals and organizations *associated* with FSC. The measures and consequences depend on the gravity of the violation.

However, several challenges have been identified in implementing the current Procedure as described below:

#### 1. Scope Limitation

This procedure is only used to evaluate possible violations to the *FSC Policy for Association*. The Scope in the Procedure defines that “**Complaints** against an organization related to the six unacceptable activities of the *FSC Policy for Association* **that overlap with certification requirements shall follow the ordinary route for dispute resolution defined in respective certification requirements and FSC-PRO-01-008 Processing Complaints in the FSC Certification Scheme**. The complaints will be processed according to dispute resolution procedures of the certificate-holder, the certification body and/or Assurance Services International (ASI).”

Learning from trade unions experience in using the system based on the defined Scope, it leads to:

- **Complexity of lengthy process with infinite timeframe poses risks to disappearance of affected stakeholders.**

Processing a complaint through multiple level of implementing bodies are redundant with repetition of back-forth documentation, correspondence and/or sound investigation, but without a clarity of who makes the final decision.

In the case of [ASD Laminat in Turkey \[1\]](#) spanned throughout 2022-2024 following *FSC-PRO-01-008 Processing Complaints in the FSC Certification Scheme*, the subsequent [ASI Public Summary of the Complaint \[2\]](#) after 9 (nine) months of investigation clearly notes “this case is potentially a future source of dispute regarding FSC’s Policy for Association for the CH” and concluded Nonconformities of the CAB involved (cq. BM Trada).

Despite the investigation results concluding that the CH was failing to comply with FSC core labour requirements, particularly freedom of association and collective bargaining, it failed to force the CH implementing the labour requirements as the CH appointed a new CAB shortly after the union filed a formal complaint to ASI, making ASI's Final Complaint Investigation Report irrelevant to the CH, and a new certificate was issued to ASD Laminat by the new CAB (cq. Interface).

During this process, the company/CH continued to terminate affected union members and put pressures on remaining members to quit the union.

The damages from this complex and lengthy process were:

1. We lost the union
2. ASD Laminat got away from its anti-union practices
3. BM Trada as the CAB got away with its dismally auditing conduct
4. Interface as the new CAB certified a union-busting company and ignored major CARs.

All combined undermined the integrity and reputation not just of FSC CoC Standard, but the entire FSC systems.

- **Risks of inapplicability**

There had been several occasions where the integrity and credibility of the FSC certification systems had been put into high risk or inapplicability in countries in which that constitutionally-guaranteed civil and political rights cannot be freely exercised. This has been shown recently in Fiji, Belarus, Philippines and Myanmar, amongst others. In cases like this, there is no or limited credible independent assessment or auditing that can be undertaken; while impacted rights holders and affected stakeholders cannot freely express their concerns or observations on the Organisation's non-conformity with applicable requirements of the Policy for Association.

## 2. **Continued presence of retaliation**

There are many cases that companies use various methods to put pressures on rights holders or stakeholders to retaliate for exposing companies' violations including processing a FSC PfA complaint, in forms such as criminalization, Strategic Lawsuit Against Public Participation/SLAPP or impose monetary sanctions by refusing to pay workers' wages during the dispute.

So far the Procedure does not require a refrain from retaliation for a decision to maintain association or proceed to end disassociation, making it difficult for both parties to come to a conflict resolution on a fair ground in the spirit of respect for UNGP.

### 3. Lack of fair compensation

The procedure warrants organization to reimbursing the cost of the complaint investigation process and to compensate the costs of the process of ending disassociation to FSC (see: Preconditions for initiating the process for ending disassociation / Annex 4) **before** entering into a formalized engagement with FSC through an agreed roadmap or remedy.

In the events of unfair dismissal due to violation of labour rights, payments of rightful wages and other compensation are often not paid by companies. To ensure a fair resolution of disputes, it is imminent that these compensations to workers for the loss of income during the dispute leading to submission of complaint to FSC be included in the Preconditions to Maintain Association or Ending a Disassociation.

#### Purpose

The purpose of the motion is to improve the current Procedure FSC-PRO-01-009 *Processing FSC Policy for Association Complaints*, to address the Scope limitation, continued presence of retaliation against right holders/stakeholders, and the lack of fair compensation, in an advanced/revised version of the Procedure.

#### Strategy Link

- To Strategy 1, Goal 1.2: "Streamline policies and standards towards outcome orientation"
- To Strategy 2, Goal 2.4: "Scale up benefits for Indigenous Peoples, communities, smallholders and workers."

#### Further Information

<https://archive.bwint.org/cms/turkish-workers-fight-asd-laminat-go-on-strike-2770.html>

<https://www.facebook.com/BWIGlobalUnion/posts/turkish-workers-fight-asd-laminat-go-on-strikethe-turkish-wood-and-paper-industr/5833827456662614/#>

[1] [https://drive.google.com/file/d/1G8aWvZGbpGoxJ9crp0lZqk-\\_1SLJJq56/view?usp=share\\_link](https://drive.google.com/file/d/1G8aWvZGbpGoxJ9crp0lZqk-_1SLJJq56/view?usp=share_link)

[2] [https://drive.google.com/file/d/1dfH6QlJsZ537CwGIRvzCNjnZhDeK0MXh/view?usp=share\\_link](https://drive.google.com/file/d/1dfH6QlJsZ537CwGIRvzCNjnZhDeK0MXh/view?usp=share_link)

[29-2025\\_Improve\\_FSC\\_Complaint\\_Mechanism\\_20250313122938\\_ENG\\_Original.pdf](#)

[29-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[29-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[29-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

# **Final motion feasibility assessment, conducted by the FSC Secretariat**

29/2025

**Strengthen System Integrity by Improving Processing FSC® Policy for Association  
Complaint FSC-PRO-01-009 V4-0 Procedure**

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- The motion assumes that complaints will be solved in a more timely manner and with fairer outcomes for complainants, such as workers, by:
  - Allowing rightsholders and affected stakeholders to file Policy for Association (PfA) complaints to FSC also for disputes covered by the scope of FSC certification instead of having to apply the complaints procedure (FSC-PRO-01-008). They would not have to solve the dispute at the operational level according to lowest level principle but could involve FSC at the outset without having to involve the FSC certificate holder (CH), the certification body (CB), nor Assurance Services International (ASI).
- Harms of rightsholders, in particular lost rightful wages of workers, affected by non-conformities of certificate holders are remedied as part of PfA complaint handling processes both in re-association processes, as well as in cases of conditions set for remaining associated.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- A revised PfA procedure (FSC-PRO-01-009 V4-0) which includes
  - a broader “Scope” allowing rightsholders and affected stakeholders to file PfA complaints to FSC also for disputes covered by the scope of FSC certification instead of having to apply the complaints procedure (FSC-PRO-01-008) and without involving the CH, CB nor ASI.
  - new provisions in its Annex 4 on preconditions for ending disassociation including
    - “The disassociated organization shall demonstrate commitment to fair and good faith bargaining to achieve fair compensation.”
    - “The disassociated organization shall refrain from any retaliation, intimidation or criminalization against rights holders or stakeholders.”

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- Strategy 1, Goal 1.2:  
“Streamline policies and standards towards outcome orientation”
- Strategy 2, Goal 2.4:  
“Scale up benefits for Indigenous Peoples, communities, smallholders and workers”

## 2.2 Contribution to Global Strategy

Contribution to Strategy 1, Goal 1.2:

- The intention of the motion is indeed more ‘outcome orientation’ for rightsholders and affected stakeholders in complaint processes. This intention is put at risk by the following:
- The motion requests to apply the PfA to cases that are currently covered by a different procedure (Processing Complaints in the FSC Certification Scheme FSC-PRO-01-008):

Complaint cases covered by FSC certification requirements are part of the FSC assurance and certification model requiring the responsible complaint handling body (CH, CB, ASI) to manage a case. Requiring FSC to handle such complaints instead, and to handle them according to the PfA procedure (FSC-PRO-01-009), weakens and complicates FSC’s assurance and certification model.

This will result in complaint cases covered by FSC certification requirements

- to be handled according to the PfA procedure while this procedure was not developed to cover certification requirements. For example, PfA procedure does not entail requirements that account for the role of CBs or ASI in assuring conformity with FSC requirements; it requires FSC International to investigate cases and not the CB or ASI; it requires independent expert decision panels and the involvement of the FSC Board of Directors; etc.
- to be handled in two possible ways, either by the complaints’ procedure or by the PfA procedure, depending solely on which procedure the complainant indicates in the complaint. This would reduce the clarity of the applicable normative process for the complaint handling bodies.
- to not being handled at the lowest possible level i.e. at the operational level, which is recognized also in the United Nations Guiding Principles (UNGPs) for grievance mechanisms as the most effective way to solve disputes.
- It may also create complications where the certification body is separately handling an issue and in the meanwhile a PfA case is initiated.

Contribution to Strategy 2, Goal 2.4:

- The intention is to scale up benefits for rightsholders and affected stakeholders in dispute cases. It assumes that by filing PfA cases with FSC instead of complaints with the responsible handling body (CH, CB, ASI) these benefits will be reached in a more timely and fair manner.
- Experience of past PfA cases showed that handling such cases is complex for FSC because the PfA procedure operates outside of FSC’s usual assurance and certification model. The PfA procedure also includes more formal steps for decision making. This resulted in PfA cases often requiring several years until closure.
- PfA cases can end with a disassociation, which is usually not of benefit for affected stakeholders and rightsholders. Re-association processes are rare, complex and take several years until remedy / compensation of harms is implemented.
- The new provisions proposed as preconditions for ending disassociation may contribute to strategy 2 and goal 2.4 by putting more emphasis and ensuring scrutiny of those provisions. At the same time, the FSC remedy framework partly covers those new provisions already as explained below in section 6.2.4.

## 3 CLARITY & SPECIFICITY OF THE MOTION

- The motion is clear and specific.
- It requests specific changes to the PfA procedure (FSC-PRO-01-009) as specified under point 1.2.

## 4 FEASIBILITY OF IMPLEMENTATION

### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.4 (Pre)conditions for implementation

- Revision process of the PfA procedure:

The requested changes will need to be addressed as part of a revision process according to FSC-PRO-01-001.

- Alignment and/or revision of the complaints procedure FSC-PRO-01-008:

The deliverables of this motion require applying requirements of the PfA procedure to complaint cases in scope of certification. This will require changes to the procedure which is currently applicable to such cases (the complaints procedure FSC-PRO-01-008) to ensure alignment between the procedures.

As the complaints procedure is currently under revision with a final draft planned for Q1-Q2 2026, this motion, if passed, may require an extension to process and potentially an additional consultation phase.

- Alignment and/or revision of additional requirements in the PfA procedure:

The current requirements for PfA cases will need to account for the new case types requested to be processed under this procedure. Amongst others, the current need to involve the FSC Board of Directors for disassociation decisions may need to be re-assessed, the role of other implementing bodies in assessing a case may need to be defined, etc.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- Rightsholders and affected stakeholders will have the choice of either filing PfA complaints with FSC or to go the usual route of filing complaints with the responsible complaint handling body. For the preconditions for ending disassociation, these groups may benefit from more clear conditions about compensation for wages and against retaliation.
- Complaint handling bodies (CH, CB, ASI) will have less clarity on which route a complaint may take, potentially dealing with parallel processes according to two procedures (Complaints and PfA)
- FSC International will be required to deal with more complaint cases and to invest in the number and capacity of staff to handle the additional PfA cases that will reach FSC, instead of general complaints being handled by CHs, CBs, or ASI.
- The new type of PfA complaints will require more capacity and time to be processed (compared to general complaints), as the PfA procedure has more formal steps to handle disputes.

### 5.2 Synergies with work underway:

- The joint revision of the FSC Procedure for Processing Complaints in the FSC Certification Scheme (FSC-PRO-01-008) and of the Appeal's Procedure (FSC-PRO-01-005) is underway:  
<https://connect.fsc.org/current-processes/revision-complaints-and-appeals-procedures>

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- No direct connections found.>

### 6.2 Alternative 1

#### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

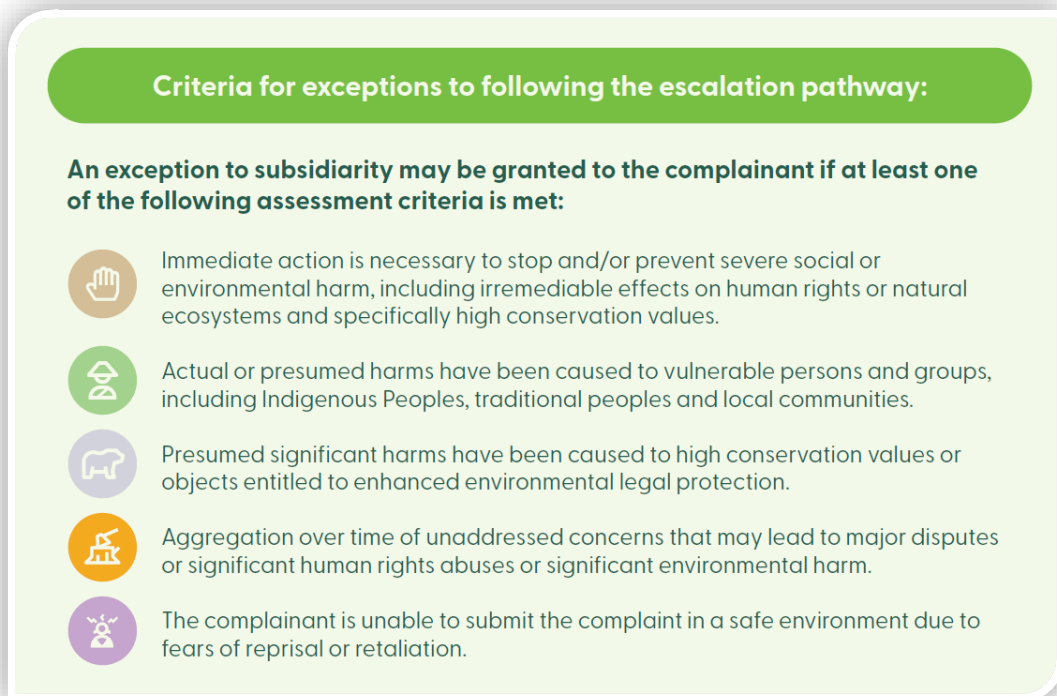
#### 6.2.2 Description

- The joint revision of the FSC Procedure for Processing Complaints in the FSC Certification Scheme (FSC-PRO-01-008) and of the Appeal's Procedure (FSC-PRO-01-005) is ongoing.
- This revision has the stated objective to align the complaints mechanism (general complaints and appeals) with the UNGPs, which seems to also be a request of this motion. Consequently, Draft 1-0 of the revised procedure already incorporates the principles of the UNGPs in its requirements.
- The public consultation of Draft 1 ended in August 2025 providing the opportunity to provide comments. Targeted stakeholder engagement including workers' and Indigenous People's representatives are ongoing.
- Synergies with objectives of this motion include:

- Draft 1-0 introduces exceptions to the lowest level principle allowing rightsholder and affected stakeholders to directly involve FSC International for their complaints. Please see the below visual for details.
- Clarity on timelines for processing complaints and potential extensions
- This process does not cover the PfA, the PfA procedure, nor the Remedy Framework

Graph:

### Summary of the exceptions to the lowest level principle as proposed in draft 1-0 of the revised complaints and appeals procedure



## 6.3 Alternative 2

### 6.3.1 Status:

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

### 6.3.2 Description

- The PfA procedure (FSC-PRO-01-009) will undergo a regular revision in the coming years, potentially in 2027.
- The proposed new preconditions for ending disassociation may be introduced at that point.

## 6.4 Alternative 3

### 6.4.1 Status:

- ☐ For potential consideration
- ☐ Planned / in preparation

☐ Already started

☒ Already exists

#### 6.4.2 Description

- The FSC Remedy Framework already includes provisions that require prevention of intimidation, harassment, threats and protection of complainants. The Remedy Framework governs re-association processes. Therefore, the first addition to the preconditions proposed in the motion (see section 1.2 above) is at least in part already covered in the Remedy Framework.

## 7 IN A NUTSHELL

- Motion 29/2025 proposes clear amendments to the PfA procedure (FSC-PRO-01-009) aiming at ensuring compensation and fairer outcomes of complaints for rightsholders.
- It proposes to allow rightsholders to file PfA cases with FSC for complaints in scope of FSC certification. This changes the scope of the PfA procedure with several implications as outlined in section 2.2, as the PfA procedure was not developed to process such cases. Requiring FSC to handle such complaints instead of CHs, CBs, or ASI weakens and complicates FSC's current assurance and certification model.
- The new proposed preconditions for ending disassociation are clear. In part they are already considered in the FSC Remedy Framework (see section 6.4.2 above).

### 7.1 Key open questions

- How can complaints about certification requirements be handled with the PfA procedure, while that procedure does not consider the FSC assurance model (including CBs, ASI) for processing cases?
- How will rightsholders and affected stakeholders benefit from processing complaints about certification requirements with the PfA procedure? Did the motion consider that PfA cases usually require much longer than other complaint handling processes due to more formal requirements and more complex decision making?
- The motion mentions a specific complaint case. Is that case a useful example to draw general conclusions for normative changes?
  - The circumstances of the case were unique:

The alleged violation of workers' rights in a certified company happened before the introduction of the FSC core labour requirements, while the case was handled by the complaint handling bodies some years later when those requirements were in place. Once the timing of the alleged violations and of the introduction of the FSC requirements were clarified, the connection to the PfA was then drawn because the PfA already included the unacceptable activity of ILO core convention violations at the time. Whether the case is indeed in scope and better dealt with via the PfA process is yet to be determined.

30/2025

**A ROADMAP FOR A DIGITAL INFORMATION AND VOLUME CONTROL SYSTEM TO IMPROVE THE INTEGRITY OF FSC CLAIMS (PREVIOUSLY, CONTROL ON FALSE CLAIMS ON FSC PRODUCTS)**

Merged | Policy Motion

|                           | Proposed By      | Seconded By                              | Seconded By                                            |
|---------------------------|------------------|------------------------------------------|--------------------------------------------------------|
| Name                      | Julia Griffin    | Tim Cronin                               | Patricia Patiño                                        |
| Organization / Individual | Kingfisher plc   | World Wide Fund for Nature International | Apoyo para el campesino indígena del Oriente Boliviano |
| Chamber / Subchamber      | Economic / North | Environmental / North                    | Social / South                                         |

**Policy Motion (Motion text / High-level action request):**

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025. The motion was merged with motion 31.**

FSC International shall lay the groundwork for developing and implementing a universal digital information and volume control system (henceforth, “the System”) with the goal of improving the integrity of FSC claims and protecting the value of the FSC brand.

No later than the end of the third quarter of 2027, FSC International shall:

1. Complete an **Assessment** of the impact on and needs of Certificate Holders (CHs) for meeting a requirement for all Chain of Custody (CoC) CHs to use the System.
2. Present a **Roadmap** for implementing the System with a target date of 2030.

FSC International's **Assessment** shall include:

- What tools and services should be developed to support all producers and companies, including SLIMFs, community forestry operations, and smaller as well as larger businesses, in implementing the System.
- Means for ensuring that the System reflects best practices for data security through achieving formal compliance with/certification to generally accepted IT security best practice standard.

FSC International's **Roadmap** shall include key milestones for full implementation of the System by the target implementation date. It should consider:

- The results of the **Assessment**, including possible adjustments to the 2030 target.
- The provision by FSC of a platform (e.g., FSC Trace) that is free to CHs, along with an option for CHs to use separate, interoperable platforms of their choice, with the condition that the latter meet parameters set by FSC and consulted with CHs, e.g.:
  - The type of information that must be gathered, acceptable data formats, etc.
  - How data from separate platforms would flow into a centralised database that permits Certification Bodies (CBs), FSC, and ASI to exercise effective controls.
- The results of the implementation of FSC Trace, the use of which will be mandatory for CHs in certain high-risk supply chains starting in 2026 and which will be available to all CHs voluntarily.
- The results of pilots of any separate platforms and the status of the above-referenced centralised database

The FSC Membership could then present a motion to be brought before the 2028 GA, on the basis of FSC International's **Assessment** and **Roadmap** that could ratify a final plan and target date for full implementation of the System.

In parallel, FSC shall streamline Chain of Custody (CoC) requirements for all CHs who use the System in light of the reduced risk of non-conformance. Such changes are already planned to be incorporated into the CoC standard, which is currently under revision.

### **Background Information and Key Documents:**

The purpose of this motion is to bring FSC into the 21st century when it comes to managing and controlling information passed down through FSC supply chains. This goes directly to strategy 1, goal 1.3 of FSC's Global Strategy. Entitled "Enhance verification and integrity," the goal states that FSC shall "[u]se modern technologies and control mechanisms to provide sound data to ensure verification of outcomes and impacts and overall system integrity."

It is high time for FSC to take the steps necessary to realize this goal. Increasingly, FSC is behind the times: several credible certification schemes that cover other commodities have implemented modern, digital supply chain control systems, including the Roundtable on Sustainable Palm Oil (RSPO) and Rainforest Alliance's Sustainable Agriculture Certification, among others.

There are two main reasons that a modern, digital information and control system is needed: 1) controlling false claims, and 2) producing a variety of positive benefits.

False claims pose an extremely serious threat to FSC's credibility and integrity. Examples include:

- Extensive fraudulent claims for Paulownia wood by several CHs in China.
- Widespread fraud related to Birch plywood and involving wood from Russia entering FSC supply chains.
- The case of a US company that was caught selling large volumes of non-certified wood flooring as FSC 100%
- An Austrian company that persistently sourced illegal timber from Romania and sold it as FSC certified.
- A recent study by World Forest ID, where scientific testing was used to verify claims of origin and nearly half of the certified samples failed

The situation is particularly grave when non-certified products are sold with a fraudulent FSC claim. Every effort should be made to eliminate this type of fraud from the FSC system. Not only do false claims damage FSC's reputation, they reduce the value of FSC to the many committed CHs who bring certified products to market. Stakeholders, both inside and outside FSC, generally believe that its control mechanisms are working and that products carrying an FSC claim qualify for it. When this trust is lost or substantially diminished, it causes major harm to FSC, reducing market demand, calling into question FSC's reliability for regulatory compliance, and alienating environmental NGOs and others. Additionally, claiming non-certified wood (uncontrolled material) as FSC when the latter is commonly more expensive undercuts the value of certified material, reducing income and diluting incentives for companies to participate in the FSC system. In short, incorrect, false, and fraudulent claims act as a brake on efforts to expand the area of certified forest lands and thus undermine FSC's ability to achieve its mission.

Currently, false claims are possible because FSC's existing controls are not able to prevent them. The deliberate falsification of claims cannot be eliminated unless all CoC CHs (including retailers) - are subject to effective controls. Auditing to the current CoC standard does not adequately address the risk of volume or other types of fraud for a variety of reasons. Notably, volume summaries can be falsified when a seller and a buyer have different Certification Bodies (CBs), as CBs are unable to confirm the volume of FSC transactions between them. The proposed system improves the accuracy of volume reconciliation through each stage of the supply chain, effectively preventing the creation or exaggeration of certified volumes traded.

This motion, therefore, calls on FSC to take a risk-based, phased approach aiming to bring all CoC CHs onto a secure digital information and volume control system (henceforth, "the System"). This entails completing an **Assessment** of the impacts on and needs of CHs for meeting a requirement for universal use of the System, along with a **Roadmap** for implementing the System with a target date of 2030. These will lay the groundwork for a motion to be brought before the 2028 GA that would ratify a final plan and

target date for full implementation of the System.

The **Assessment** should identify tools and services that would ensure smooth implementation of the System. In conducting it, FSC should review any previous relevant needs assessment for key stakeholder groups, including SLIMFs, community forests, together with small and medium enterprises and larger CoC certificate holders. Where there are gaps, further targeted consultation should be conducted to fill them. FSC should report on how it can use the **Assessment** to develop services and tools that enable CHs to use the System with the lowest cost and hassle possible. Finally, the System and **Roadmap** should align with and support FSC's broader efforts toward strengthening system integrity, as described in the Strategic Integrity Plan that the Secretariat has developed.

To be effective, at a minimum, the System would require all CoC CHs to report each sale transaction of materials carrying an FSC claim through a web-based material accounting system, along with the claim, volume, species, and similarly basic product characteristics. This information could then be made available to the customer receiving the materials, who confirms it through a 'digital handshake.' The information entry and confirmation should start at the top of the supply chain and flow down to the retailer. The System should also have robust means for preventing tampering with information – possibly, but not necessarily, based on blockchain technology.

FSC itself must provide a platform that would be free to CHs and designed to support regulatory compliance (e.g., with the EUDR, the US Lacey Act), although more advanced features could be made available for a fee. To protect confidential and other sensitive information, an FSC-provided platform must be designed in line with best practice for data security and confidentiality, where only the transaction between two parties is visible to its owners, and where solely CBs, ASI and FSC have broader access to be able to identify mismatches in the system.

CHs must also have the option to use separate, interoperable platforms of their choice, provided that a) they meet parameters set by FSC and consulted with CHs and the membership, and b) the requisite data feeds into a centralised database that permits Certification Bodies (CBs), FSC, and ASI to exercise effective controls.

Beyond combating false claims, the System could also offer numerous benefits, including:

- Facilitating the management and exchange along supply chains of data needed for regulatory compliance and/or useful for meeting sustainability goals: e.g., geolocation data; species; evidence of risk assessment and mitigation; and information about the positive impacts of FSC forest management on ecosystem services such as net GHG emissions, water quality, and conservation of biodiversity;

- Facilitating efficient FSC transactions because FSC claims are passed on digitally and not via paper or electronic invoices;
- Eliminating incorrect claims resulting from legitimate errors that otherwise perpetuate throughout a supply chain;
- Managing reputational risk for downstream companies that are currently vulnerable to deliberate fraud on the part of bad actors upstream;
- Strengthening audits throughout the supply chain by reducing reliance on invoices, credit accounts and other documents that are vulnerable to manipulation;
- Allowing auditors to better prepare for audits because they have advanced access to all the transaction data, including volumes, and thus can spend more time on other aspects of quality assurance;
- Increasing transparency (while preserving confidential information) across the supply chain, even when multiple certification bodies have audited different links in the chain;
- Enabling FSC to analyse data in near real-time across supply chains

Approval of this motion will produce another major benefit. It requires FSC to streamline Chain of Custody (CoC) requirements for all CHs who use the System in light of the reduced risk of non-conformance. Such changes are already planned to be incorporated into the CoC standard, which is currently under revision.

Examples of how the COC process could be streamlined include:

- Simplifying and removing specific audit requirements related to volume summaries, certified supplier validation and purchase and sales documentation in the FSC CoC and Controlled Wood standards;
- Adjusting audit frequency and intensity, e.g., allowing a reduced scale of on-site audits for CHs acting as Traders, and CHs using the Transfer System, considering increasing remote audits for CHs with no physical possession, etc.;

[30-2025\\_Control\\_False\\_Claims\\_for\\_FSC\\_Products\\_V1\\_20250313122259.pdf](#)

[30-2025\\_Control\\_False\\_Claims\\_V2\\_20250422075833.pdf](#)

[30-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[30-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

[30-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**30/ 2025**

**A roadmap for a digital information and volume control system to improve the integrity of FSC claims (previously, control on false claims on FSC products)**

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- The groundwork for developing and implementing a universal digital information and volume control system ("the System") is carried out by the third quarter of 2027, i.e. the assessment of System's impact on and needs of certificate holders is conducted and the implementation roadmap is developed. The groundwork results are used by the members to present a follow-up motion at the GA 2028 to ratify a final plan and a target date for full implementation of the System, currently targeted at 2030.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- The Motion explicitly lists two deliverables to be developed in sequence by the Secretariat by the third quarter of 2027:
  1. Assessment of the impact on and needs of various types of Certificate Holders (CHs) for meeting a requirement for all Chain of Custody (CoC) CHs to use the System;
  2. Roadmap for implementing the System by 2030.

The Assessment shall include:

- The list of tools and services to be developed to support various types of CHs in implementing the System;
- Means to ensure the System reflects best practices of data security achieved through formal compliance with/certification to generally accepted IT security best practice standard.

The Roadmap shall:

- include the milestones for full implementation of the system by 2030;
- consider the results of the Assessment;
- include provision of a platform, which is free for all CHs and allows interoperability with other platforms, provided other platforms meet parameters set by FSC and consulted with CHs, for example such as 1) type of collected information and data formats, 2) process of information flow from other platforms into the centralized database allowing CBs, FSC and ASI to exercise effective controls;
- include results of FSC Trace used by CHs;
- include results of pilots of any separate platforms and the status of centralized database.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- Goal 1.3 “Enhance verification and integrity” of the Global Strategy.

### **2.2 Contribution to Global Strategy**

- The motion contributes to Goal 1.3 Enhance verification and integrity of the Global Strategy, by allowing real-time verification of business transactions with FSC material, thus improving the integrity of FSC supply chains.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion is fairly clear on the expected outcomes and the timeline for it.
- The motion requests FSC to include in the Assessment means for ensuring that the System reflects best practices for data security through achieving formal compliance with/certification to generally accepted IT security best practice standard”. The statement is somewhat ambiguous but suggests that the review and selection of suitable security frameworks will be carried out by Q3 2027, while the implementation is planned for 2030 in accordance with the roadmap.
- The motion also touches on several points of the development of related normative requirements, which need further clarification:
  - The motion calls on FSC to streamline CoC requirements for all CoC certificate holders using the System, and indicates that the requirements are planned to be incorporated into the revised CoC standard. The standard revision process involves open stakeholder consultations. Therefore, it should be noted that specific requirements will be included in the revision but remain subject to public consultation and other decision-making processes according to the standard procedures for developing normative documents.
  - The motion states that the use of FSC Trace will be mandatory for CHs in certain high-risk supply chains starting in 2026. While this process is in progress and is aligned with the CoC standard revision in 2026, the effective date should be expected in 2027.
  - The motion calls for laying the groundwork for implementing a universal digital information and volume control system, which implies that it is applicable to organizations holding different types of certificates, including forest management (FM) and controlled forest management (CFM). Therefore, some additional normative adaptations might be required specifically for these types of certificate holders.
  - Given that a new set of certification requirements is to be developed, these should be reflected in the corresponding auditing requirements applied by certification bodies.

## **4 FEASIBILITY OF IMPLEMENTATION**

### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

#### **4.2 Estimated one-time costs:**

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### **4.3 Estimated ongoing costs (per year):**

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### **4.4 (Pre)conditions for implementation**

- Executing the motion within the proposed timeframe will require the establishment of a cross-functional project team with expertise in normative development, technical implementation, stakeholder engagement, strategic communication and market development. This may necessitate a realignment of existing and planned priorities, workstreams, and budget allocations.
- Expertise in information security is needed to conduct an assessment and review of the security frameworks of the System to achieve formal compliance with/certification to generally accepted IT security best practice standard.

### **5 BENEFITS / IMPACT**

#### **5.1 Expected impacts of the motion**

- The motion considers a step-wise approach to implement a universal volume control system, starting from implementing the groundwork. This work will be valuable for the already ongoing development of FSC Trace.
- Implementation of the motion within the proposed timeframe will affect the Secretariat's planned workstreams and budget allocations for 2026-27 and will therefore necessitate their realignment.

#### **5.2 Synergies with work underway:**

- FSC is developing FSC Trace – the tool on the basis of blockchain for recording and verifying transactions of material with FSC claims. In September 2025 FSC Trace Version 1 passed all security and penetration tests. FSC has begun onboarding organizations in a staged way starting from Forest Management CHs and priority access companies. The phased rollout of FSC Trace should allow FSC to carefully monitor system performance and user experience as adoption expands. FSC is progressing towards inviting all CHs by the end of 2025 to use FSC Trace on a voluntary basis. The motion implementation can be built on FSC Trace.
- System Integrity is a priority for FSC in 2026. One of the components of this priority is to further enhance technical features of FSC Trace for improved integrity oversight by FSC and CBs, including better data analytics. Within the priority it is planned to develop the needed normative requirements into the FSC framework to make use of FSC Trace mandatory in high-risk supply chains.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- There are no other related motions.

### 6.2 Alternative 1

#### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

#### 6.2.2 Description

- FSC is developing FSC Trace – the tool on the basis of blockchain for recording and verifying transactions of material with FSC claims. In September 2025 FSC Trace Version 1 passed all security and penetration tests. FSC has begun onboarding organizations in a staged way starting from Forest Management CHs and priority access companies. The phased rollout of FSC Trace should allow FSC to carefully monitor system performance and user experience as adoption expands. FSC is progressing towards inviting all our CHs by the end of the year to use FSC Trace on a voluntary basis. The motion implementation can be built on FSC Trace.
- System Integrity is a priority for FSC in 2026. One of the components of this priority is to further enhance technical features of FSC Trace for improved integrity oversight by FSC and CBs, including better data analytics. Within the priority it is planned to develop the needed normative requirements into the FSC framework to make use of FSC Trace mandatory in high risk supply chains.

## 7 IN A NUTSHELL

- The motion considers a step-wise approach to implement a universal digital information and volume control system, starting from implementing the groundwork, by conducting an assessment of the System's impact on and needs of certificate holders, and developing an implementation roadmap. This work will be an input to further Membership discussion and motion development for GA 2028. The outputs of the Motion will be valuable for the ongoing development of FSC Trace - currently a voluntary blockchain-based solution, and a planned mandatory solution for high-risk supply chains. However, Implementation of the motion within the proposed timeframe will affect the Secretariat's planned workstreams and budget allocations for 2026-27 and will therefore necessitate their realignment.

### 7.1 Key open questions

- The motion requests FSC to include in the Assessment means for ensuring that the System reflects best practices for data security through achieving formal compliance with/certification to generally accepted IT security best practice standard. The statement is somewhat ambiguous but suggests that the review and selection of suitable security frameworks will be carried out by Q3 2027, while the implementation is planned for 2030 in accordance with the roadmap.

- While the motion considers the System to be free of charge for the users, it is worth clarifying if the motion relates to the basic functionality, or all potential functionality, including additional features.
- The development of a universal digital information and volume control system will affect the entire FSC certification ecosystem. Consequently, corresponding normative requirements must be established not only for CoC certificate holders but also for forest management certificate holders (FM, FM/CoC, CFM) and certification bodies, even though they are not explicitly mentioned in the motion.

## 32/2025 FSC STREAMLINING SIMPLIFICATION OF THE NORMATIVE FRAMEWORK

Edited | Policy Motion

|                                  | Proposed By                              | Seconded By                          | Seconded By      |
|----------------------------------|------------------------------------------|--------------------------------------|------------------|
| <b>Name</b>                      | Tim Cronin                               | Christopher Gibbons                  | Alan Smith       |
| <b>Organization / Individual</b> | World Wide Fund for Nature International | American Green Consulting Group, LLC | Smith, Alan, Dr. |
| <b>Chamber / Subchamber</b>      | Environmental / North                    | Economic / North                     | Social / North   |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

FSC shall launch a time bound process, with external support, to propose a pathway for streamlining and simplifying the overall FSC normative framework.

The objective is to ensure FSC is fit for purpose, effective and efficient. Streamlining should reduce unnecessary administrative and financial burden for Certificate Holders (CHs), to enable a stronger focus on achieving social and environmental outcomes, while upholding the integrity of FSC's unique multi-stakeholder governance system.

FSC defines the normative framework as comprising all the components that ensure the development, functioning, maintenance and integrity of the FSC certification and accreditation system. This process should include these, along with the practices of the governance entities responsible for overseeing and implementing the normative framework.

FSC should engage external experts to carry out the initial assessment to ensure the requisite expertise and objectivity. This assessment should also involve Certificate Holders, to identify specific burdens and procedural pain points, and suggest ways to counter these.

### Background Information and Key Documents:

Background: Over time, and with successive General Assemblies and the motions that are approved by the membership, as well as staff and board decisions have made FSC process and requirement heavy. The whole system has become bureaucratic, complicated, and hard to access for its members and others. It is very rare that something is removed from the normative framework. Past attempts to streamline have been unsuccessful. It is time to take a step back and to understand the lessons learned from past efforts, and to come up with practical means of streamlining and simplification. On the standards front, one possibility is revisiting the use of *critical indicators*, which are required, and other indicators which are required under certain circumstances, further expanding the use of a risk based approach. The intention should not be to lower critical performance requirements for environmental, social, and economic aspects of forest management.

[32-2025\\_Simplification\\_of\\_the\\_Normative\\_Framework\\_V1\\_20250313124350\\_0.pdf](#)

[32-2025\\_Final\\_Feasibility\\_Analysis\\_ENG.pdf](#)

[32-2025\\_Final\\_Feasibility\\_Analysis\\_SPA.pdf](#)

[32-2025\\_Final\\_Feasibility\\_Analysis\\_FRA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**32/2025** FSC Streamlining Simplification of the Normative Framework

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- To review, streamline, and simplify the overall FSC normative framework, to ensure it is fit for purpose, effective and efficient.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- Recommendations for a pathway to streamline and simplify the normative framework based on an externally led initial assessment that starts with identifying the problems.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- - (no such link stated)

### **2.2 Contribution to Global Strategy**

- It directly contributes towards Goal 1.2 “Streamline policies and standards towards outcome orientation”.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion clarifies that the proposals for a streamlining pathway should consider the overall FSC normative framework, including the standard setting requirements as well as the functioning of governance bodies overseeing the normative framework.
- The motion provides some specifications for how to conduct the process and whom to involve.
- The FSC Secretariat has worked over the last years exactly on this goal and it remains unclear why those efforts are not considered sufficient. For instance, the last revision of the standard setting procedure for international normative documents conducted 2021 and 2022 was guided by a white paper developed by an external expert who consulted various stakeholders, including members, to identify issues with the normative framework and develop proposals for streamlining it.

## **4 FEASIBILITY OF IMPLEMENTATION**

### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months  
☐ 6 months – 1 year  
☒ 1 – 3 years  
☐ More than 3 years

#### **4.2 Estimated one-time costs:**

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### **4.3 Estimated ongoing costs (per year):**

- ☒ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### **4.4 (Pre)conditions for implementation**

- External experts doing the analysis and proposing measures for streamlining and simplification
- Certificate Holders available to contribute to the assessment
- In house capacities to receive and analyse results and go through approval processes with decision makers

### **5 BENEFITS / IMPACT**

#### **5.1 Expected impacts of the motion**

- Increase the accessibility of the normative framework and reduce the burden of certificate holders without affecting the rigor of the environmental, social and economic requirements overall.

#### **5.2 Synergies with work underway:**

- The revision of the standard setting procedure for Forest Stewardship Standards (FSC-PRO-60-006 and FSC-PRO-60-006a) includes incorporating the concept of outcome orientation and was expanded to also explore how the risk based approaches procedure (FSC-PRO-60-010) can be incorporated in the standard setting process for FSS, to streamline outcome orientation and make better use of the risk based approaches procedure.
- FSC received a significant grant and technology support this year to develop an interface to make requirements accessible to users, allowing for instance each certificate holder access to a package of all the requirements they need. In a second step FSC will be working on fully moving requirements from pdf documents to an online database which will be a key contribution to streamlining the normative framework and to make revision processes more effective.
- To implement the FSC Global Strategy 2021-2026 the FSC Secretariat has worked in multiple ways on the streamlining of the normative framework, including merging of standards, revision of the standard setting procedure for international normative documents and development of the risk based approaches procedure. Some of these measures require time to fully take effect as they are incorporated in ongoing revision processes.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- - (none identified)

### 6.2 Alternative 1

#### 6.2.1 Status

- ☐ For potential consideration
- ☒ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

- As described under the synergies of work underway, streamlining in the context of the revision of the FSS standard setting procedure is being worked on and will also be considered for the revision of the Principles and Criteria and International Generic Indicators.
- The digital transformation of the normative framework is a key work area with multiple ongoing and planned projects to make requirements more accessible to users.
- The next review process of FSC-PRO-01-001 will be based on an analysis of the changes introduced to increase the efficiency and effectiveness of the policy development and revision processes and will then feed into the future revision process to further improve the normative framework.

## 7 IN A NUTSHELL

- The motions' goal of streamlining and simplification of the FSC normative framework is broad.
- The motion is specific and clear in defining the process for recommending a streamlining pathway.
- The FSC Secretariat has worked over the last years exactly on this goal and it remains unclear why past, ongoing and planned streamlining efforts are not considered sufficient.

### 7.1 Key open questions

### 33/2025 STRENGTHENING FSC'S VALUE PROPOSITION

Edited | Policy Motion

|                                  | Proposed By             | Seconded By           | Seconded By                               |
|----------------------------------|-------------------------|-----------------------|-------------------------------------------|
| <b>Name</b>                      | Sakari Suuriniemi       | Lucio Brotto          | Leendert van der Vlist                    |
| <b>Organization / Individual</b> | UPM-Kymmene Corporation | Brotto, Lucio, Mr.    | Netherlands Centre for Indigenous Peoples |
| <b>Chamber / Subchamber</b>      | Economic / North        | Environmental / North | Social / North                            |

#### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

FSC will take following actions to strengthen its value proposition to Certificate Holders, forest managers and other FSC stakeholders:

- As a part of the Global Strategy 2027-2032 preparatory work, FSC secretariat – in co-operation with the board - will plan and carry out a high-quality analysis of FSC's current value proposition and its possible gaps. The analysis shall consider the preliminary work already conducted by the secretariat and respective Board discussions and agreed next steps, complementing the work while also securing adequate ambition level, focus on root causes and delivery of tangible solutions to improve value proposition. Based on the analysis, develop a Value Proposition Action Plan with clear goals and actions that can be integrated to the new FSC Global Strategy as seen fit by the FSC Board. The analysis and action plan shall cover value proposition not only to Certificate Holders but also to other key stakeholder groups in all three chambers.
- Strengthen its global advocacy efforts by establishing a thorough FSC Advocacy Plan that will be approved by the board. Following these actions, FSC will conduct bolder advocacy positioning FSC as a key solution provider to global forest-related challenges. This includes requesting FSC to be recognized as an implementation tool Certificate Holders can use to proof their compliance with most important legislation with global impacts. The tools needed for this must be voluntary and complementary to existing FSC normative requirements.
- Establish FSC Service Orientation Action Plan to support strengthening FSC's services especially in Forest Management certification uptake and maintenance.

## Background Information and Key Documents:

Global FSC certified area covers 162 million hectares, which is 4,05% of the total global forest area of approximately 4 billion hectares. FSC's impact comes from those certified hectares that produce the multiple benefits FSC offers to a great variety of different right holders and stakeholders. The bigger the FSC certified area, the broader the impact of FSC and the benefits it provides.

FSC aims to increase its global impact. This happens only if the current and new forest managers are interested in FSC and decide to keep their certificates or certify the currently uncertified forests they own or manage. Currently FSC's growth is stagnating which indicates that the value FSC offers for forest managers is inadequate.

[33-2025\\_FSCs\\_value\\_proposition\\_V1\\_20250313121702\\_0.pdf](#)

[33-2025\\_Final\\_Feasibility Assessment\\_SPA.pdf](#)

[33-2025\\_Final\\_Feasibility Assessment\\_FRA.pdf](#)

[33-2025\\_Final\\_Feasibility Assessment\\_V2\\_ENG.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**33/2025** Strengthening FSC's Value Proposition

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- Certificate Holders perceive more tangible value from FSC, leading to an increase in total forests certified with FSC.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- FSC has conducted an analysis of its value proposition and developed a Value Proposition Action Plan, which will be endorsed by the Board and incorporated into the next global strategy where relevant.
- FSC has developed an Advocacy Plan to strengthen its global advocacy efforts and improve external support/uptake of FSC solutions. It is approved by the Board and promotes CH benefits, such as voluntary regulatory compliance solutions.
- FSC has finalized a Service Orientation Action Plan that supports strengthening FSC's services, especially in Forest Management uptake and maintenance.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- Not provided.

### **2.2 Contribution to Global Strategy**

- Deliverable 2 (Advocacy Plan) is directly related to Goal 3.1 (stronger alliances, coalitions, and partnerships), while deliverables 1 and 3 (Service Orientation and Value Proposition) connect to Goal 2.1 (advance FSC in value chains).

## **3 CLARITY & SPECIFICITY OF THE MOTION**

- The intended audiences to be addressed by this motion could be clearer to ensure alignment with implementation outcome. The background/rational section states this motion is coming from a context of improving growth of FSC-certified forests with a focus on existing and future Forest Managers, therefore could be interpreted with an FM focus. However, this motion also requests an exercise for "key stakeholder groups in all three chambers" which can be seen as connected but separate exercises. Finally, in a separate Value Proposition exercise with BM101, the Secretariat defined value proposition as the "net benefits (monetary and non-monetary) that can be obtained through FSC certification, and its implication for net-new acquisition and retention/renewal of CHs" asserting that this exercise should cover all Certificate Holders (forest management *and* chain of custody), with separate analyses to be conducted for other stakeholder groups.
- The motion requests approval of a foundational document from the FSC International Board of Directors. It is unclear if this is intended for all deliverables. As the BoD meetings

occur three to four times annually and the prioritization process around topics and decision items is competitive and time-limited, implementation timelines for these deliverables would require a degree of flexibility. It is unclear if this requirement is congruent with the urgency that the requestor illustrates, or if the intended result (e.g., member involvement) could be accomplished through other means (such as discussion forums).

- The Advocacy Plan includes a request for FSC to pursue recognition as a compliance tool, which implies there has been a membership decision on this topic when separate motions (cf. M34/2025) exist to tackle the regulatory compliance topic more directly. In this respect, it has been interpreted as an example whereby FSC would identify through this exercise which solutions it would advocate for that best support the organizational strategy and aims.

## **4 FEASIBILITY OF IMPLEMENTATION**

### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

### **4.2 Estimated one-time costs:**

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### **4.3 Estimated ongoing costs (per year):**

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### **4.4 (Pre)conditions for implementation**

- **Customer Centricity:** In relation to normative enquiries, FSC International has historically maintained a limited direct relationship with certificate holders due to its role within a third-party certification system. Responsibilities have traditionally been managed through certification bodies, and direct client engagement has been minimized to preserve neutrality as a scheme owner and standard setter. However, to better meet the evolving needs of certificate holders, FSC International must enhance its customer centricity. This includes re-evaluating and adapting the roles and responsibilities of internal experts. A roadmap is planned for 2025 and will be completed and implemented, providing resource allocation requests are fulfilled.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- The motion would provide member reinforcement to help prioritize and progress ongoing and related initiatives at the Secretariat level.
- Assuming the results of the requested deliverables (plans) are implemented, FSC would have identified and tackled several barriers that are preventing growth of FSC-certified forests worldwide, meaning that more forests are certified along with the associated benefits to people.

### 5.2 Synergies with work underway:

- All deliverables mentioned have corresponding work packages underway, as highlighted within paper delivered to the FSC International Board of Directors in BM101 which defined the context, challenges and potential solutions around the value proposition challenge towards Certificate Holders. It was a first in a series that will continue for other priority stakeholders across the chambers.
- The Advocacy Plan is being addressed through an updated annual Engagement Strategy in Q1 2025 with further alignment to the Global Strategy 2027-2032 and Climate, Biodiversity and Restoration Strategic Framework processes.
- The Service Orientation Plan is partially covered and underway with a Customer Care roadmap planned for 2025.
- The background/rationale of this motion is stalling FSC-certified forest growth, which although is not a specific deliverable within this motion, is an organizational focus area (FM Growth was a global organizational priority in 2024).

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- The Service Orientation aspect of this motion is reflected within Motion 23, "[Certificate Holder Ombudsmen](#)" where customer responsiveness of FSC is the sole focus. Similarly, the Advocacy Plan deliverable, which includes a requirement for FSC to be recognized as a compliance tool, is being tackled more centrally in Motion 34, "[Advancing FSC Certification as a Recognized Compliance Tool for International Regulatory Frameworks](#)"

### 6.2 Alternative 1

#### 6.2.1 Status

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

- It is possible for each of these deliverables to be merged with motions that tackle the identified issues more directly and holistically. Each deliverable could be its own stand-alone motion.

## **7 IN A NUTSHELL**

- The motion aims to address stagnating FSC-certified forest growth by enhancing FSC's value proposition, but its broad scope—particularly the call for stakeholder-wide engagement and multiple Board-approved deliverables—needs further definition to become actionable. While the deliverables align with ongoing initiatives and offer several synergies, their feasibility hinges on flexible timelines, sufficient resourcing and resolving internal challenges. In summary, while developing three action plans is achievable, the positive outcomes of strengthened FSC positioning would only become tangible once implemented by the Secretariat outside of this motion through related or ongoing processes.

### **7.1 Key open questions**

- What are the underlying assumptions that Service Orientation and Advocacy (deliverables 2 and 3) are connected to FSC's perceived value proposition challenges, especially as it relates to FM growth challenge as outlined in the background/context?

34/2025

**ENHANCING THE RECOGNITION OF FSC CERTIFICATION IN INTERNATIONAL REGULATORY FRAMEWORKS**

Edited | Policy Motion

|                           | Proposed By      | Seconded By      | Seconded By           |
|---------------------------|------------------|------------------|-----------------------|
| Name                      | Caroline Duhesme | Alan Smith       | John Palmer           |
| Organization / Individual | ATIBT - Congo    | Smith, Alan, Dr. | Palmer, John, Mr.     |
| Chamber / Subchamber      | Economic / South | Social / North   | Environmental / North |

**Policy Motion (Motion text / High-level action request):**

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

This motion proposes that FSC **strengthen its efforts to promote the recognition** of FSC certification as a **credible contributor to compliance pathways** within key international environmental and trade regulations, while continuing to ensure the robustness and reliability of its traceability systems such as **FSC TRACE**.

**These regulations include, but are not limited to:**

- The **EUDR** - European Union Deforestation Regulation
- **CITES** – Convention on International Trade in Endangered Species of Wild Fauna and Flora
- **FLEGT** – Forest Law Enforcement, Governance and Trade
- **Lacey Act**
- **CSDDD** – the upcoming Corporate Sustainability Due Diligence Directive (*which primarily focuses on transparency, materiality assessment, and corporate disclosure obligations*).

To achieve this, **FSC commits to:**

1 **Engage** with regulatory authorities, governments, and key stakeholders **to communicate how FSC standards and systems support regulatory objectives**, while maintaining FSC's independent and chamber-balanced standard-setting process.

*This collaboration will respect principles of fair competition and avoid any obligation to adapt FSC standards to external frameworks.*

2 **Develop** a clear and credible framework to demonstrate **complementarity and mutual recognition**, where possible, between FSC certification and regulatory requirements.

*This may include strategic collaborations with initiatives such as the Accountability Framework Initiative (AFi), to align with international best practices.*

3 **Promote** FSC certification as a **voluntary, market-based mechanism** that helps certified companies meet regulatory expectations, reduce duplication of efforts, and streamline compliance – particularly in areas of **legality, traceability, and sustainable practices**.

4 **Enhance support for smallholders** by developing inclusive, practical approaches to certification, including **group certification models** and **simplified compliance tools**, enabling them to access regulated markets more effectively.

The objective of this motion is to ensure that **FSC certification is better recognized** as a relevant and trusted instrument for demonstrating **alignment with key regulatory objectives**.

This motion **does not propose automatic equivalence** ("Green Lane"), but seeks the **highest feasible level of recognition and visibility** for FSC within the global regulatory landscape.

### **Background Information and Key Documents:**

Environmental and forest-related **regulations** are **becoming increasingly complex**, placing pressure on companies to demonstrate due diligence, traceability, legality, and sustainability.

Frameworks such as the **EUDR** and the **upcoming CSDDD** are reshaping market access rules for timber and other forest-risk commodities. While the CSDDD does not prescribe direct forest-related requirements, it shapes expectations around corporate sustainability due diligence, materiality assessment, and supply chain transparency. **FSC already provides strong assurance systems** –

including standards, chain of custody, and traceability tools like TRACE – that can support companies in meeting these evolving regulatory expectations and demonstrating responsible sourcing practices.

**? This motion aims to:**

- Show that the FSC membership requests the organization **to engage with regulators and public authorities** in appropriate and constructive ways, respecting applicable legal frameworks in different jurisdictions;
- Clarify FSC's value as a **credible and independent contributor** to legal compliance;
- **Promote FSC's existing tools and systems** without requiring structural changes to the standard;
- **Protect the voluntary and chamber-governed nature** of FSC's approach, while increasing its visibility and relevance in regulated markets and current or emerging ESG disclosure frameworks.

[34-](#)

[2025\\_FSC\\_Certification\\_as\\_Compliance\\_Tool\\_for\\_International\\_Regulatory\\_Frameworks\\_V1\\_20250313.pdf](#)

[34-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[34-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[34-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

## **Final motion feasibility assessment, conducted by the FSC Secretariat**

34/2025

### **Enhancing the Recognition of FSC Certification in International Regulatory Frameworks**

Accepted by the Motions Committee as:

☐ Statutory motion

☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- FSC is better recognized as a relevant and trusted instrument for demonstrating alignment with key regulatory objectives, without automatic equivalence ("Green Lane") but aiming for the highest possible level of recognition and visibility. These regulations include, but are not limited to, the European Union Deforestation Regulation (EUDR), the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the Forest Law Enforcement, Governance and Trade (FLEGT) initiative, the Lacey Act and the Sustainability Due Diligence Directive (CSDDD).

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- A clear recognition framework to demonstrate complementarity and mutual recognition between FSC certification and regulatory requirements is developed.
- FSC certification is promoted as a voluntary market-based compliance mechanism that helps companies meet regulatory expectations, reduce duplication of efforts and streamline compliance. The areas of focus are legality, traceability and sustainability practices.
- Support mechanisms for smallholders are enhanced by practical approaches to certification, including group certification models and simplified compliance tools.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- Market transformation and FSC leadership: This motion aligns with FSC's Global Strategy (2021–2026), which aims to transform markets and drive change in global forest governance.

### **2.2 Contribution to Global Strategy**

- The motion contributes to Strategy 2 Market Transformation action 2.2. Accelerate the market uptake of FSC-certified products and ecosystem services and to Strategy 3 Catalyze Change actions 3.1. Advance the mission through stronger alliances and partnerships, as well as 3.2 Increase FSC's relevance for governments.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion clearly asks for a recognition framework, referring to specific regulations and for promotion of FSC as a voluntary tool for compliance.
- It is less clear in terms of deliverables connected to engagement and small holders, leaving it open, at which point they could be considered satisfied. For example, FSC

already has support mechanisms in place for small holders for certification and respectively regulatory compliance. It is also not clear at which point requested engagement efforts would be satisfied.

## **4 FEASIBILITY OF IMPLEMENTATION**

### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☒ More than 3 years

### **4.2 Estimated one-time costs:**

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### **4.3 Estimated ongoing costs (per year):**

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### **4.4 (Pre)conditions for implementation**

- The initial implementation requires investments for framework development, strategic engagement, as well as for promotion and tool development.
- Ongoing maintaining of alignment requires additional staff resources and monitoring tools. Regulations/frameworks and FSC requirements are not static but are constantly updated and revised. Maintaining several alignment and recognition processes with related compliance tools as well as managing relationships with the parties, will require active ongoing work even after initial achievement, including but not limited to policy alignment and solutions development, advocacy and engagement and traceability solutions.
- The timelines of changes in regulations and requirements do not necessarily align with FSC normative document revision timelines and can be introduced with a pace or at the times that our current processes are not designed for. A faster alignment process model would need to be explored to develop and maintain any alignments and recognitions so that FSC certificate holders are able to rely on them.

## **5 BENEFITS / IMPACT**

### **5.1 Expected impacts of the motion**

- Formal or mutual recognition could simplify regulatory compliance for some companies, when these are directed at stable and/or widely used regulations or frameworks.

- Positioning FSC as a voluntary tool to support compliance could increase uptake of FSC certification.
- Communicating clearly how FSC solutions align with different frameworks would reduce efforts for companies that are required or choose to comply with them, acting also as incentive for certification.
- Achieving and continuously maintaining formal recognitions or ongoing alignment require significant ongoing investment and effort across several FSC functions.

## 5.2 Synergies with work underway:

- The general sentiment and many activities referred to are aligned with already ongoing work. E.g. FSC has already released a voluntary add-on as a compliance support tool for the EUDR with tools to help companies with implementation. This work provides a foundation for further offering with other requirement frameworks as well. It includes all aspects from standard writing (regulatory module – concept), to tech development (FSC Trace) as well as advocacy and promotion.
- CITES alignment does already exist in FSC framework, and FSC has released guidance on FLEGT and EUTR in the past.
- A new function of Regulatory Framework was established 2024 and further developed to a department for Policy Alignment in 2025. There is work under way to improve transparency and communication of already existing alignments with other legislations, and developing guidance how FSC certification can be used for other requirement frameworks.
- In 2025, FSC has been building foundations for enhanced engagement activities with several new positions on different levels.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- Motion 33 on Strengthening FSC's Value Proposition also refers to positioning FSC for CHs as a voluntary regulatory compliance solution.

### 6.2 Alternative 1

#### 6.2.1 Status

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

- Considering the strategic and often long-term nature of engagement and relationship management, particularly with regulators, it might be better placed in the next strategy for the organization. The lead time to achieve recognition and visibility through engagement may extend the expected lifecycle of a motion.

## 7 IN A NUTSHELL

- The motion describes a wide range of activities aiming at enhancing FSC's recognition by the regulators or requirement setters as a credible contributor to compliance pathways. The general goal of strengthening FSC's position in the regulatory landscape is aligned with many

ongoing workstreams that consider a range of approaches to strengthen FSC's position in this setting and are working towards better communicating how FSC solutions support and interoperate on different levels with key sustainability regulations and requirement frameworks.

## **7.1 Key open questions**

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35/2025

**PROMOTING FSC TRADE THROUGH TRANSPARENCY ON SHARE OF CERTIFIED PRODUCTS**

Edited | Policy Motion

|                                  | Proposed By                              | Seconded By      | Seconded By      |
|----------------------------------|------------------------------------------|------------------|------------------|
| <b>Name</b>                      | Tim Cronin                               | Alan Smith       | Caroline Duhesme |
| <b>Organization / Individual</b> | World Wide Fund for Nature International | Smith, Alan, Dr. | ATIBT - Congo    |
| <b>Chamber / Subchamber</b>      | Environmental / North                    | Social / North   | Economic / South |

**Policy Motion (Motion text / High-level action request):**

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

FSC shall improve the FSC certificate database (FSC Search) so that chain-of-custody certificate holders (CHs) have the option of participating in a system that provides users of the database with information about the share of their overall turnover in forest products that is FSC certified. FSC shall propose a system, consult it with the membership and CHs, and implement it no later than 2028 and sooner if possible.

**Background Information and Key Documents:**

The purpose of this motion is to make it easier for buyers to connect with motivated sellers of FSC-certified products. This supports FSC's Global Strategy: Strategy 2, Goal 2.2 – Accelerate the market uptake of FSC-certified products and ecosystem services.

Three decades after the birth of FSC, there is still no ready way for those interested in sourcing of FSC certified products to identify the most qualified and motivated suppliers. Specifically, there is no way to search online to identify the companies that actively produce and/or stock FSC products and thus have them most readily available for sale.

One can search the FSC certificate database for products of a variety of types, but the results will include all companies who claim to offer such products and will not distinguish those who actually make and/or stock them at significant levels. The problem is that there are many “empty” chain of custody (CoC) certificates, i.e., companies that are CoC certified but do little or no trade in FSC products. This seems to be true particularly in the “middle” of the value chain – secondary manufacturers and traders. According to past studies conducted by FSC and ASI, approximately 50% of CoC certificates are empty in the sense that the Certificate Holder (CH) does not trade any FSC material. Where this occurs year after year, why would such companies continue to pay for FSC certification?

When asked if their products are FSC certified, some unscrupulous CHs simply provide a copy of their CoC certificate, thereby misleading the buyer. Buyers who are not familiar with the FSC system – and they are many – do not understand the difference between certified companies and certified products: they assume that a CoC certificate means that all the products a certificate holder offers are FSC certified and do not understand that in fact they need to check sales documents for FSC claims and/or look for on-product labels in order to verify that a product is certified.

On the buyer side, it is frustrating not to be able to easily locate the companies that actively manufacture and/or distribute FSC-certified products and thus will be able to offer the best prices and availability. For example, a search for active CHs in China who claim to offer fiberboard yields over 700 results. How many of these companies actually manufacture or stock certified fiberboard in volume, and which ones are they? There is no way to tell and there is no ready alternative information source. Working through a long list such as this, potential buyers will inevitably contact dozens of companies who say they don’t have FSC products available, the lead times are long, the prices are unnecessarily high – or even try to talk them out of buying FSC altogether.

There is a relatively simple way to address these problems. Certificate Holders can be given the option of displaying information about the share of their overall turnover in forest products that is FSC certified on the FSC certificate database, and this information can be verified by Certification Bodies (CBs) during annual CoC audits.

The way that the information is shared could take a number of forms. It does not need to be an actual percentage; it could be presented in the form of a scale. For example, there could be color coding or numbering that corresponds to shares that fall within the 1% to 25% range, those that fall in the next quartile, and so forth.

Auditors already verify a company’s annual turnover in forest products as this is the basis for calculating the Annual Accreditation Fee (AAF) every company is assessed. The CoC standard also requires that companies keep and CBs check the quantities of certified products bought and sold annually. As

companies are already tracking the volumes of certified product sold, it is a relatively easy step to calculate and report the total value to the auditor, and for auditors to check this in the same way that they do the reported quantities. Annual revenue from certified sales divided by overall turnover equals a share that would be displayed in some way on the FSC certificate database if and only if a CH opts in.

CHs who choose to be transparent in this way should be rewarded by being visibly flagged in the certificate database in some way and appearing at the top of search results. This will create an incentive not only for companies to be more transparent but also for them to increase their percentage of certified sales and to sell products with FSC claims even when the customer doesn't require it. Buyers will benefit by being able to more easily identify companies who are best positioned to satisfy their demand. FSC trade and overall satisfaction with the system can only increase as a result.

What this motion is not:

This is not a cure-all for the problem of empty certificates or inadequate demand for and "leakage" of FSC products, but it would be a big step in the right direction. FSC could take another step by flagging CHs whose certificates are empty or very nearly so. This could have the added benefit of discouraging fraud, as logic suggests that companies with no or few FSC sales are relatively more likely to falsely represent products as certified that are not, with or without a claim; but this is a topic for another day and possibly a different motion.

[35-  
2025\\_Promoting\\_FSC\\_Trade\\_through\\_Transparency\\_on\\_Share\\_of\\_Certified\\_Products\\_V1\\_20250313.pdf](#)

[35-2025\\_Final\\_Feasibility\\_Assessment\\_ENG\\_0.pdf](#)

# **Final motion feasibility assessment, conducted by the FSC Secretariat**

35/2025

## **Promoting FSC Trade through Transparency on Share of Certified Products**

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

The FSC certificate database (FSC Search) allows Chain of Custody (CoC) certified companies to display the percentage or share (color coding or numbering that corresponds to shares that fall within a range, e.g., 1-25%) of their overall turnover in forest products that is FSC certified, improving transparency and making it easier for buyers to identify companies that are active and committed to FSC-certified trade.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- FSC Search is updated with functionality for CoC certified companies to opt in and display their FSC-certified turnover percentage or share.
- CBs have clear requirements to verify and record FSC-certified turnover and percentage or share of FSC turnover during annual audits.
- Relevant FSC policies and standards are updated to reflect requirements for collecting, verifying, and reporting FSC-certified turnover.
- The new data field in FSC Search is accompanied by visual indicators (search facets and information fields on certificate records) to highlight CoC CHs that have voluntarily shared the information.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- Goal 1.3 (Enhance verification and integrity) - Use modern technologies and control mechanisms to provide sound data to ensure verification of outcomes and impacts and overall system integrity.
- Goal 2.2 (Accelerate the market uptake of FSC-certified products and ecosystem services) - Demand for FSC-certified products and ecosystem services is increased in high priority geographical areas and sectors through marketing and communications initiatives with key partners.
- Goal 2.3 (Unleash the power of data to demonstrate positive outcomes) - Generate and use verified impact data on the well-being of FSC-certified forests, people, and businesses.

### **2.2 Contribution to Global Strategy**

- As stated in the motion, this motion supports FSC's Global Strategy: Strategy 2, Goal 2.2 – Accelerate the market uptake of FSC-certified products and ecosystem services. It is clear that this motion may contribute positively to FSC's strategic ambition to make certification more attractive, usable, and valuable for stakeholders by enhancing transparency, richness of content, and usability of the FSC certificate database. Enabling CHs holders to voluntarily disclose their share of FSC-certified turnover percentage or share would provide buyers with

clearer, more actionable/credible information to identify sellers, and this aligns with our strategy's market trust and engagement aspirations. The motion could support strengthening FSC's credibility by promoting the use of verifiable data captured during audit processes, reinforcing confidence in the FSC's certification. Overall, the motion could support our efforts to foster stronger market uptake of FSC-certified products by making it easier for CoC CHs to source from active and reliable partners

### 3 CLARITY & SPECIFICITY OF THE MOTION

- The motion is clear in its intent to add an optional feature to FSC Search. It specifies the nature of the data to be displayed (the percentage or share of forest product turnover that is FSC certified) and sets the scope of implementation (through voluntary participation by CoC CHs). But it should be clear that the motion assumes that the necessary data is already available and does not explicitly address the need for updates to FSC policies and standards, which are critical to ensure valid and auditable data.

### 4 FEASIBILITY OF IMPLEMENTATION

#### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

- Revisions to FSC policies and normative standards will be required, including updates to the CoC standard and the AAF policy, to establish clear requirements for collecting, calculating, verifying, and reporting FSC-certified turnover. These revisions must clarify that FSC-certified turnover is distinct from total forest products turnover and define how it is to be verified during audits.
- CBs will need to adapt their audit procedures to include a review of FSC-certified turnover alongside the existing assessment of overall forest product turnover. This will likely involve additional checks of volume registers against financial documentation, such as sales tax filings, income tax records, accounting records, financial statements, and management accounts, to verify the accuracy of reported FSC-certified turnover. CBs will also need to

document the consent or non-consent of CHs to display the turnover percentages or shares data publicly.

- FSC Search will require system development updates to introduce new data fields to capture the FSC-certified turnover percentage or share, track opt-in status, and display audit dates alongside the percentage or share to ensure clarity about when the data was last verified. The interface will need to include new visual elements to highlight participating CoC companies, and development work will be needed to enable faceted search, allowing users to filter results based on turnover transparency and other relevant criteria.
- Engagement and communications efforts will be necessary to explain the purpose of the new feature, guide CHs and CBs on how to calculate and report on FSC-certified turnover, and highlight the potential business advantages of opting in. Special attention will be needed to ensure that CHs understand both the benefits and obligations associated with participation.
- Legal and privacy considerations must be addressed to ensure that the publication of FSC-certified turnover percentages or shares, even on an opt-in basis, complies with data protection requirements and minimizes potential liability or reputational risks.

## **5 BENEFITS / IMPACT**

### **5.1 Expected impacts of the motion**

- The motion is expected to improve transparency for buyers by helping them identify CoC companies that actively trade FSC-certified products. This could incentivize CoC CHs to increase their certified product turnover and promote greater trust in the FSC. It may also help discourage misuse of FSC by CoC companies with minimal or no certified product trade. It is important to consider that this also introduces complexities related to auditing financial data and ensuring consistency across CBs, which may increase the audit burden. There is also a potential reputational risk if data displayed is misinterpreted by users unfamiliar with the nature of certification.

### **5.2 Synergies with work underway:**

- FSC Trace and the development of immutable transaction records for FSC-certified products could complement the objectives of this motion. Verified trade records could form the foundation for even greater transparency in the future.
- The motion aligns with ongoing efforts to enhance FSC Search functionality and improve the digital experience for users.
- Links to initiatives addressing false claims and strengthening supply chain traceability should be considered to ensure alignment and avoid duplication of effort. For example, the publication of information “no FSC Trade since the last audit” will be published on the CoC CH’s certification record in the FSC Search in the future. Also, high-risk supply chains will be required to use FSC Trace and enter all transaction information of FSC-related products.

## **6 ALTERNATIVES**

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### **6.1 Connections to other motions:**

- Motion 34/2025 (Advancing FSC Certification as a Recognized Compliance Tool for International Regulatory Frameworks) - This motion focuses on strengthening FSC’s role in global compliance systems, which directly ties into FSC Trace and the broader ambition of verified, transparent data. While Motion 34/2025 is more focused on regulatory alignment, it establishes a framework for reliable data capture and reporting, which is essential for the credibility of the turnover transparency proposed in Motion 35/2025. Both motions share the goal of enhancing the trustworthiness of FSC-certified products, and the infrastructure

improvements driven by Motion 34/2025 (such as strengthening FSC Trace) could serve as foundational elements for implementing Motion 35/2025 effectively.

- Motion 30/2025 (Control False Claims for FSC Products) - This motion aims to implement a robust control system to prevent false claims of FSC certification, focusing on transaction and volume verification through FSC Trace. Motion 35/2025, while addressing transparency in a different way (via public disclosure of certified turnover), aligns with the same overarching concern: improving market integrity and reducing fraudulent or misleading practices. If Motion 30/2025 succeeds in enhancing transaction-level verification, this could provide a reliable data source that supports or even strengthens the accuracy of the turnover figures displayed in FSC Search, making these motions mutually reinforcing.

## **6.2 Alternative 1**

### **6.2.1 Status**

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

### **6.2.2 Description**

- Further development of FSC Trace, which provides immutable and verified records of FSC-certified transactions, could serve as a more robust foundation for transparency of always up-to-date trade data. Instead of relying on a simple turnover percentage or share, FSC could enable CHs to voluntarily share summary information on their verified transactional data, offering buyers a clear view of actual trade activities of FSC certified products. CHs that opt into sharing such data could have a recognition or distinction (e.g., “trusted trader” badge) within the FSC Search based volume of FSC-certified products traded, rather than focusing solely on turnover percentages or shares.

## **6.3 Alternative 2**

### **6.3.1 Status:**

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

### **6.3.2 Description**

- 

## **6.4 Alternative 3**

### **6.4.1 Status:**

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

### **6.4.2 Description**

- <Assessment in form of a short description of the work>

## **7 IN A NUTSHELL**

- Motion 35/2025 is clear and focused and proposes to improve transparency regarding what products a CH actively trades with data and search capabilities in FSC Search, and the motion would allow CHs to decide/consent to display the percentage or share of their forest products turnover that is FSC certified. While technically feasible, the motion requires updates to the normative framework, audit procedures, and system interfaces to ensure reliable and verifiable data. The motion's objectives align with broader efforts to improve market confidence and traceability within the FSC system, though there is potential overlap with ongoing work on FSC Trace and other motions related to compliance and false claims. The benefits are clear, but care must be taken to avoid unintended consequences, such as misinterpretation of data or inconsistency in implementation across geographies.

### **7.1 Key open questions**

- How should FSC ensure consistency in reporting and verification of FSC-certified turnover across different CBs and regions, as this expands beyond the current scope of the AAF policy-related turnover data, potentially requiring volume and financial data correlations?
- Would the meaning of turnover percentages or shares be usable and understandable if contributed during annual audits, or is additional explanatory information (when was the last audit, is the data a year old or a month old) needed to avoid misinterpretation?
- Should FSC consider making product transparency mandatory in the future to maximize impact?

36/2025

**INCENTIVIZING/ENCOURAGING/ESCALATING FSC CERTIFICATE HOLDERS TO PROCURE  
FSC-CERTIFIED SUPPLIES FOR INTERNAL USE**

Accepted by MC | Policy Motion

|                                  | Proposed By               | Seconded By                | Seconded By                       |
|----------------------------------|---------------------------|----------------------------|-----------------------------------|
| <b>Name</b>                      | Carlos Ortega Ayala       | Yolanda Ramírez Villacorta | Edgar Rodolfo Juárez García       |
| <b>Organization / Individual</b> | Ortega Ayala, Carlos, Mr. | AIDER                      | Juárez García, Edgar Rodolfo, Mr. |
| <b>Chamber / Subchamber</b>      | Economic / South          | Social / South             | Environmental / South             |

**Policy Motion (Motion text / High-level action request):**

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

FSC certificate holders, both in forest management and chain of custody, use potential FSC-certified products internally and in their operations. These include the packing, packaging and transport of what they produce and sell, as well as with their suppliers or stakeholders.

FSC must find a way of incentivising/encouraging/escalating so that FSC certificate holders not only produce, transform or sell FSC-certified products (knowing that they can also sell non-certified products), but also that their consumption of FSC-certified products is equally consistent and responsible.

**Background Information and Key Documents:**

In over 56,000 FSC-certified companies, potential FSC-certified products are used internally in:

Offices: Premises, furniture, stationery, copies, etc.

Promotional: Catalogues, calendars, flyers, printed material, displays, etc.

Operations: Documents, invoices, labels, etc.

Packing: Cardboard boxes, promotional material, etc.

Packaging: Plywood boxes, chipboard, MDF, corrugated cardboard boxes, pallets, etc.

Decoration: Christmas trees, etc.

These could all be FSC Certified, but in general they are not.

If there is anyone who knows about FSC certification, it is an FSC certificate holder who is already a conscious consumer and so is possibly in alignment and consistent...

[36-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[36-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

[36-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

## **Final motion feasibility assessment, conducted by the FSC Secretariat**

**36/2025**

**Incentivizing/encouraging/escalating FSC certificate holders to procure FSC-certified supplies for internal use**

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

### **1 ENVISAGED OUTCOME AND DELIVERABLES**

#### **1.1 Stated or Assumed Outcome**

FSC has a means to incentivize and/or encourage consumption of FSC-certified products within existing Certificate Holders.

#### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- FSC International delivers a report on how to effectively encourage consumption of FSC-certified products within existing Certificate Holders, e.g. through procurement claims, promotional activities, marketing materials, other incentives, new/adjusted standards, ...
- FSC International concludes at least one project based on the report.

### **2 FSC GLOBAL STRATEGY 2021-2026**

#### **2.1 Link to Global Strategy**

(not provided)

#### **2.2 Contribution to Global Strategy**

Strategy 2.2 – Accelerate the market uptake of FSC-certified products and ecosystem services.

### **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion asks for FSC to “find a way of incentivizing/encouraging/escalating” FSC certificate holders to consume FSC-certified products. While the direction and intended outcome is clear, the deliverables and approach are left to the Secretariat.
- The motion also focuses on tools and does not define a measure of success, i.e. it talks about incentivization, but not about uptake.
- The motion is targeted at existing certificate holders. While this is clear and specific, it is also restrictive as it does not include Promotional Licence Holders and non-certified companies which are the largest purchasers of FSC-certified products.

### **4 FEASIBILITY OF IMPLEMENTATION**

#### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

Consuming FSC-certified products and internal procurement standards are not fully covered by current standards and procedures. As such, communication and promotion by a Certificate Holder risks unauthorized use of the FSC trademark – this needs to be taken into account.

### 5 BENEFITS / IMPACT

#### 5.1 Expected impacts of the motion

- Increase in demand for FSC-certified products
- More awareness and communication around the consumption of FSC-certified products, e.g. through public procurement policies and promotional statements
- More identification and closer link of Certificate Holders with FSC
- Increased requirements for CBs and/or TSPs to validate claims

#### 5.2 Synergies with work underway:

- FSC provides **procurement policy guidance**, e.g. <https://uk.fsc.org/choosing-fsc-certified-products> and <https://ca.fsc.org/ca-en/business-resources/develop-a-procurement-policy>
- A **Pilot Project for Enabling Procurement Claims** is running with two pilot organizations since 2022 including internal consumption, see here: <https://connect.fsc.org/current-processes/pilot-project-enabling-procurement-claims> – the project is focused on companies in less dominant industries that own their own factories.
- As a follow-up to the above pilot, a **Purchasing Claims Pilot Project** is currently planned to be set up, to establish a framework and process for companies (incl. PLHs), who do not own the factories which receive materials in question, to make substantiated and quantifiable purchasing claims around labelled and non-labelled products, verified by a third-party.
- FSC Promotional Licence Holders can already make **procurement claims** for consumption of finished and labelled products, cf. p25-26 of the FSC Trademark Use Guide for PLH GUI at <https://connect.fsc.org/document-centre/documents/resource/165> - in practice, these encounter difficulties as TSPs often do not have the means to easily verify such claims.
- As part of the FSC Implementation Framework, **Strategy 2.2 Action 24: FSC Sourcing Preference** aims to drive key market players to proactively position FSC as a preferred choice and to promote FSC. In 2023, FSC International identified 70 major brands of whom 42 pledged their commitment to prioritize FSC-certified sourcing (see p26 of the 2023 Annual Report for success stories here: [https://fsc.org/sites/default/files/2024-12/FSC\\_Annual\\_Report\\_2023.pdf](https://fsc.org/sites/default/files/2024-12/FSC_Annual_Report_2023.pdf)). Since 2024, this Action has been paused due to prioritization of other Value Chain Development work.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- No

### 6.2 Alternative 1

#### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

#### 6.2.2 Description

The options in work underway mentioned in 5.2 could be seen as sufficient to cover the motion and might solely need to be familiarized/communicated more proactively with existing Certificate Holders, e.g. through a concerted marketing campaign.

## 7 IN A NUTSHELL

FSC Certificate Holders can already today consume FSC-certified products, and in certain limited instances also talk about it. FSC International is providing opportunities to support CHs through guidance documents, procurement claims pilots and PLAs. However, FSC International is currently not *proactively* incentivizing/encouraging/escalating consumption, which is picked up by this Motion and could give additional weight to the work currently underway.

### 7.1 Key open questions

None

## 37/2025 FACILITATING INDIGENOUS CERTIFICATION

Edited | Policy Motion

|                                  | Proposed By           | Seconded By                                   | Seconded By                          |
|----------------------------------|-----------------------|-----------------------------------------------|--------------------------------------|
| <b>Name</b>                      | Ryan Temple           | Rachel Baker                                  | Christopher Gibbons                  |
| <b>Organization / Individual</b> | Sustainable Northwest | Washington Conservation Action Education Fund | American Green Consulting Group, LLC |
| <b>Chamber / Subchamber</b>      | Social / North        | Environmental / North                         | Economic / North                     |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

### Motion:

In recognition of the rights of Indigenous Peoples over their lands and territories, whether held under formal title or customary tenure, and their vital role in the stewardship of the world's forests, the FSC shall initiate a process, co-led with Indigenous Peoples, to support the development and implementation of national-level strategies that offer a pathway for the certification of Indigenous-owned, -managed, or -tenured forests, with the explicit aim of addressing structural barriers and increasing participation. The strategies will:

1. Identify and address structural barriers to certification of Indigenous lands and forest management—such as high certification costs, inflexible procedures, lack of cultural fit, skepticism and unclear value proposition
2. Protect their indigeneity and the relationship to the land for their cultural survival, cultural integrity and cultural identity
3. Integrate Indigenous ecological knowledge, governance systems, and culturally-grounded forest management practices into the FSC system
4. Explore funding resources that may allow this effort to be more immediately implemented in targeted regions.

### Background Information and Key Documents:

**Background/rationale:**

Although Indigenous Peoples manage some of the most biodiverse and sustainably stewarded forests in the world, they remain underrepresented within the FSC system. Many Indigenous-owned or -managed forests meet, or nearly meet, FSC standards, yet structural barriers, such as certification cost and complexity, limited recognition of customary tenure and traditional knowledge, and insufficient access to markets continue to hinder participation. This limits the ability of Indigenous communities to benefit from FSC certification while also weakening FSC's equity, diversity, and global credibility.

While Principles 3 and 9 of the FSC Forest Stewardship Standard explicitly recognize Indigenous rights, including the right to self-determination, to free, prior, and informed consent (FPIC), and to the protection and use of traditional ecological knowledge (TEK), the practical pathways for applying these principles on Indigenous-owned or -managed forests remain undeveloped.

This motion responds by proposing a co-created process and pathway to:

- increase Indigenous inclusion, recognition, and benefits within FSC
- honor Indigenous knowledge, culturally appropriate outcomes and decision-making
- expand the diversity and reach of FSC-certified forests
- improve market access for Indigenous forest products

**Implementation considerations**

The process will consider and address key implementation challenges, including:

- variability in Indigenous forest management systems and governance structures
- the mismatch between certification requirements (e.g., written plans, technical documentation) and oral or experiential knowledge
- limited access to technical support, funding, and auditors trained in culturally appropriate engagement and TEK assessment

The process will also consider and build on existing tools and initiatives, including:

- The ability to develop community-defined indicators
- Ongoing auditor training programs
- The role and function of the Permanent Indigenous Peoples Committee (PIPC)
- The existing New Approaches Project that aims to simplify certification for smallholders and communities and can be expanded to explicitly include Indigenous Peoples and their lands.
- The FSC Indigenous Foundation, which can help address cost and capacity barriers

- Broader efforts to increase Indigenous representation and leadership across FSC systems and processes
- Efforts to strengthen Indigenous-defined FPIC, including in the revision of the FSC Principles & Criteria

[37-2025\\_Facilitating\\_Indigenous\\_Certification\\_VI\\_20250313.pdf](#)

[37-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[37-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[37-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**37/2025** Facilitating Indigenous Certification

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- FSC shall initiate a process, co-led with Indigenous Peoples, to support the development and implementation of national-level strategies that provide a pathway for the certification of Indigenous-owned, managed, or tenured forests. The intended outcome is to address structural barriers to certification, increase Indigenous participation in FSC, and better integrate Indigenous ecological knowledge and governance within FSC frameworks.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- Completion of a defined, co-led process (FSC and representative Indigenous Peoples) that develops national-level strategies offering pathways to certification.
- Publication(s) of national-level strategy document(s) that, at minimum, identify structural barriers to certification (e.g., costs, procedural fit, value proposition, recognition of customary tenure) and propose measures to address those barriers.
- Clear provisions within those strategies to protect Indigenous identity, cultural survival and governance (i.e., measures that protect indigeneity and cultural integrity as part of certification pathways).
- Recommendations or mechanisms for integrating Indigenous ecological knowledge, Indigenous governance systems and culturally grounded forest management practices into FSC application and implementation, including practical guidance on how oral/experiential knowledge may be recognized where documentary evidence is not available.

A documented assessment of potential funding sources or funding approaches to enable implementation in targeted regions.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- Not provided in the motion text.

### **2.2 Contribution to Global Strategy**

- The motion contributes significantly to several FSC Global Strategy goals. It aligns with Goal 1.1 by requiring a co-led process with Indigenous Peoples to develop national-level certification pathways. It supports Goal 1.4 by aiming to unlock certification for Indigenous-managed forests and thereby broaden FSC's coverage. It advances Goal 2.1 by addressing market and recognition barriers that limit the value of Indigenous Forest products. It furthers Goal 2.4 by seeking to remove structural obstacles and increase accessibility for Indigenous rights-holders. It embodies Goal 3.1 through its emphasis on co-governance and sustained partnership with Indigenous organizations. Finally, it contributes to Goal 3.4 by promoting recognition of Indigenous stewardship and integrating Indigenous ecological knowledge into FSC practice.

### 3 CLARITY & SPECIFICITY OF THE MOTION

- The motion's core objective is clear: initiate a co-led process with Indigenous Peoples to develop and implement national-level strategies that provide pathways for the certification of Indigenous-owned, managed, or tenured forests.
- However, the motion lacks specificity regarding implementation details:
  - The term “pathways” is too broad and should be defined. It needs to specify whether these will be normative protocols, guidance documents, equivalence assessments, or adapted audit methodologies.
  - The motion does not specify measurable indicators or targets (e.g., number of strategies delivered, pilots completed, hectares eligible, uptake targets).
  - It requests integration of Indigenous ecological knowledge and protection of identity, but does not specify mechanisms for IP protection, data sovereignty, consent procedures, or how oral/experiential knowledge will be validated in audit contexts.
  - It does not include a plan for piloting these strategies.

### 4 FEASIBILITY OF IMPLEMENTATION

#### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

- Allocation of dedicated resources (financial and staff) for culturally appropriate global engagement with diverse Indigenous Peoples.
- Establishment of a robust, adequately resourced, and Indigenous-led or co-led governance structure for the development process.
- Access to diverse expertise: Indigenous knowledge holders, participatory methods specialists, ecologists, social scientists, and FSC standards experts.
- Buy-in and active participation from a representative range of Indigenous Peoples globally.

- Clear terms of reference defining scope, decision-making, intellectual property, and data sovereignty from the outset.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- Positive: Could significantly enhance FSC's relevance and accessibility for Indigenous Peoples globally, potentially leading to increased certification of Indigenous lands. Strengthens FSC's commitment to recognizing Indigenous rights, sovereignty, and knowledge systems. May create a valuable model for incorporating diverse knowledge systems into certification.
- Challenges/Risks: High risk of difficulty in achieving consensus on a single protocol/metric that respects the vast diversity of Indigenous ecological practices and governance systems worldwide. Potential for the process to be perceived as overly complex, costly, or slow. Risk of creating a framework that is difficult to implement or audit consistently. Potential for conflict with existing FSC standards or requirements if integration is not carefully managed. May raise expectations that are difficult to meet.

### 5.2 Synergies with work underway:

- Directly relevant to FSC's overall work concerning Indigenous Peoples, and potentially activities of the FSC Indigenous Foundation.
- Connects with broader FSC discussions on simplifying access to certification for specific groups (e.g., smallholders, communities) and incorporating diverse forest values. (like ecosystem services, potentially related to Motion 48/2025 – Developing a Landscape Certification Framework for Integrated Ecosystem Management).
- Could inform, and be informed by, ongoing or future revisions of the FSC P&C and related requirements, including workstreams addressing scope, applicability, and the implementation of requirements relevant to Indigenous Peoples' rights and circumstances (building on but potentially broader than just Principle 3).

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- Motion 05/2025 Establish a Fourth Indigenous Chamber: Both address Indigenous engagement and standing within FSC.
- Motion 38/2025 Strengthen market development for communities and smallholders in tropical countries: Shares a focus on supporting specific stakeholder groups.

### 6.2 Alternative 1: Strengthening Implementation of Existing Framework.

#### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☒ Already exists

#### 6.2.2 Description

- Rather than creating an entirely new protocol, focus on strengthening the implementation and understanding of the *existing* FSC normative framework, particularly requirements pertinent

to Indigenous Peoples (such as Principle 3), through enhanced guidance, training for auditors and stakeholders, and potentially revisions to National Standards or International Generic Indicators emerging from the P&C revision process to better reflect Indigenous contexts and facilitate certification for Indigenous organizations. This includes building local capacity to work within the current or revised existing requirements.

### **6.3 Alternative 2: Targeted Support and Capacity Building within Existing Requirements**

#### **6.3.1 Status:**

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### **6.3.2 Description**

- Develop targeted support programs, capacity building, and potentially financial mechanisms to assist Indigenous Nations in meeting existing FSC requirements (including group certification or simplified standards where appropriate), addressing practical barriers rather than creating alternative requirements.

## **7 IN A NUTSHELL**

- Motion 37 requests FSC to initiate a co-led process with Indigenous Peoples to develop and implement national-level strategies that create pathways for the certification of Indigenous-owned, -managed or -tenured forests. The initiative is strongly aligned with FSC's strategic intent on co-creation, inclusion and scaling benefits for Indigenous Peoples, but it will require careful scoping, adequate resourcing and robust safeguards to manage the diversity of legal, cultural and ecological contexts and to ensure Indigenous rights and knowledge are respected. Success depends on genuine co-leadership, clear governance, piloting in diverse contexts, and explicit protections for IP, data sovereignty and Free, Prior and Informed Consent.

### **7.1 Key open questions**

- What specific criteria will be used to define the scope of "Indigenous Peoples" eligible to participate or benefit?
- What precisely will "pathways" entail in each national context (e.g., guidance, adapted audit approaches, equivalence assessments, landscape recognition or a mix)? How will the national strategies interact with ongoing normative work (P&C & IGI revision, FPIC guidance, Indigenous Foundation activities), will they propose normative change or operational guidance?
- How will the protocol address lands where Indigenous Peoples have reserved rights but not direct ownership?
- What governance model will ensure equitable representation and decision-making for diverse Indigenous participants?
- What pilot design, measurable success criteria and M&E framework will be used to test and evaluate proposed pathways before wider roll-out?
- How will intellectual property related to traditional ecological knowledge shared during the process be protected and respected?

38/2025

## STRENGTHEN MARKET DEVELOPMENT FOR COMMUNITIES AND SMALLHOLDERS IN TROPICAL COUNTRIES

Edited | Policy Motion

|                                  | Proposed By        | Seconded By                | Seconded By                        |
|----------------------------------|--------------------|----------------------------|------------------------------------|
| <b>Name</b>                      | Chris van der Goot | Albert Oudenaarden.        | Carla Ximena Cárdenas Monroy       |
| <b>Organization / Individual</b> | Ecohout Foundation | Van den Berg Hardhout B.V. | Cárdenas Monroy, Carla Ximena, Ms. |
| <b>Chamber / Subchamber</b>      | Social / North     | Economic / North           | Environmental / South              |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

FSC will put in place a Project and/or Working group and/or Advisory group that will develop and propose ways to

1. improve acknowledgements and rewards for companies worldwide that buy certified products from communities and smallholders in tropical countries;
2. improve active support by FSC for certified community- and smallholder producers in tropical countries, especially within the scope of market access and market development.

The pro-active approach will take into account the experience and knowledge that FSC has gathered over the years in this field and the lessons learned will be documented.

Local markets as well as international markets will be addressed. Non-timber forest products and ecosystem services will be included in analyses of product mixes. Long term solutions will be sought, with attention for possibilities for capacity building at the community and for messages about local

livelihoods in marketing toolkits.

### **Background Information and Key Documents:**

Community Forestry worldwide creates a great opportunity for FSC as well as a great challenge. FSC has gathered lots of experience with supporting communities and efforts to facilitate access to markets, but also many efforts and projects disappeared without clear evaluation and documentation, one example is the SCLO (Smallholders and Community Label Option).

FSC at its best is a learning organization, keeping the tools that are proven in practice, and documenting the lessons learned and reasons for failure if things do not work out as hoped for.

To continue innovating and making use of new technologies, new organizational structures, new product concepts, FSC should involve a broad range of stakeholders in Community Forestry and keep the membership informed about developments and ideas. The motion is not too prescriptive for the implementation, but asks for some form of identifiable structure within FSC, either in the form of Working Group, Task force or other forms.

The motion gives a clear incentive and mandate from the membership to the FSC Secretariat to work in this theme. It is of great importance for community owned forests in the tropics and for FSC to expand certified area.

[38-2025\\_Market\\_development\\_for\\_communities\\_and\\_smallholders\\_in\\_tropics\\_V1\\_20250313124413\\_0.pdf](#)

[38-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[38-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

[38-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

## Final motion feasibility assessment, conducted by the FSC Secretariat

38/2025

### Strengthen Market Development for Communities and Smallholders (C&S) in Tropical Countries (TC)

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

## 1 ENVISAGED OUTCOME AND DELIVERABLES

### 1.1 Stated or Assumed Outcome

- Increased and improved market access for C&S forest producers in TC.
- Improved incentives for buyers of FSC-certified products from these groups.
- FSC leverages its learnings and structures to engage and support these actors proactively.

### 1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed

- Establishment of a formal structure (e.g., project team, working group) with a clear mandate.
- Publication of strategies, recommendations, or guidance to incentivize markets and buyers.
- Concrete initiatives have been launched to enhance support and visibility for C&S.

## 2 FSC GLOBAL STRATEGY 2021-2026

### 2.1 Link to Global Strategy

- none indicated

### 2.2 Contribution to Global Strategy

- **Strong contribution to Strategy 2:** Transform Markets Solutions. Enhance the market for forest products and services. Especially strong contribution to Goal 2.2 Accelerate the market uptake of FSC-certified products and ecosystem services, and to Goal 2.4 Scale up benefits for Indigenous Peoples, communities, smallholders, and workers.
- **Strong contribution to Strategy 3:** Catalyse Change: Work and engage with key actors to drive FSC solutions. Especially strong contribution to Goal 3.1 Advance the mission through stronger alliances, coalitions, and partnerships.
- Medium-low alignment with the Natural Tropical Forests Priority and expanding forest certification (FM) with C&S.

## 3 CLARITY & SPECIFICITY OF THE MOTION

- It identifies the beneficiaries (C&S) and the mechanism (local market development in TC).
- It provides a flexible implementation structure (e.g., working group, advisory group), which enables FSC to tailor the approach to internal capacities. However, this same flexibility creates ambiguity around the resources and capacity required for effective delivery.
- Success criteria could benefit from greater specificity (e.g., market indicators, geographic scope), but overall implementation is feasible based on the framing.

## 4 FEASIBILITY OF IMPLEMENTATION

### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☐ 1 – 3 years
- ☒ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☒ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

- **Strategic Market Clarity:** The motion underscores the need for FSC to clarify its target market positioning. In a B2B2C context, it remains unclear who the ultimate consumer is. Is the ultimate consumer the buyer purchasing imported products sourced from tropical C&S, or is the local buyer within TC purchasing domestically produced goods? Since most C&S products are sold locally, FSC must determine whether its strategic focus lies in developing local markets or focusing on international trade (e.g., EUDR) or both.
- **Global Coordination:** Implementation would require dedicated coordination, potentially through 1 FTE to lead the facilitation and oversight of the proposed structure, and clear global criteria for tropical country prioritization should be established.
- **Knowledge Management:** Internal and permanent capacity will be needed to document past experiences and consolidate learnings. This is to systematize prior project outcomes and inform future action.
- **Regional Engagement:** Regional implementation would require active coordination with network partners and national offices. This is estimated at approximately 0.5 FTE per region to ensure effective alignment and execution.
- **Local Capacity Building:** Specialized capacities must be built in selected countries, which may require dedicated staffing depending on local context and project scope.
- **Local Resource Mobilization:** The availability of funds in TC will be a key enabler for on-the-ground implementation. Funding should be assessed and secured for the rollout.

### 5 BENEFITS / IMPACT

#### 5.1 Expected impacts of the motion

- FSC would benefit from forming a cross-unit team. Local market development could boost brand visibility and revenues for companies and C&S producers. Documenting and managing the knowledge generated would add long-term value for FSC.

#### 5.2 Synergies with work underway:

- Mapping the customer experience, some country-level initiatives, and the NTF Priority.

#### 5.3 Expected impacts of the motion

- Could invite FSC International to define better who and where its final consumer is from a B2B2C perspective. This market direction could provide clarity and focus.
- Could increase the uptake of FSC in TC through better producer inclusion.
- It may strengthen market credibility and brand positioning among buyers and local consumers in prioritized TC.
- It could increase the value FSC brings for C&S in TC.

- Potentially unlocks donor or sponsor support tied to smallholder/community development.

#### 5.4 Synergies with work underway:

- Potentially accelerating FM growth in TC.
- Strengthening Community and Family Forests/SLIMF certification pathways.
- Creating Verified Impact opportunities through CES.
- It allows for better internal collaboration among different units, such as the Marketing & Commercial Unit, Global Network Unit, Forest Management Growth, Natural Tropical Forests Priority, and Community & Family Forests.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- **Motion 33/2025 – Strengthening FSC’s Value Proposition** complements Motion 38/2025. While Motion 33 focuses on a system-wide review and enhancement of FSC’s value proposition to all stakeholders—including Certificate Holders, forest managers, and broader market actors—Motion 38 provides a focused, actionable example of how that value proposition could be strengthened for one of FSC’s most vulnerable and strategic stakeholder groups: C&S in TC. Additionally, while Motion 33 focuses on a generic value proposition, Motion 38 brings the need to assess the market in terms of segments; in this case, the segment is the local markets in TC.
- Both motions aim to improve FSC’s relevance and attractiveness in the marketplace. Motion 38 emphasizes support structures and recognition mechanisms for market access, while Motion 33 seeks to institutionalize value delivery to consumers in TC through advocacy, service orientation, and strategic planning.
- **Potential for integration:** Motion 38’s deliverables (e.g., improved recognition of buyers, targeted support for smallholders, local markets development) could be embedded as a section within the **Value Proposition Action Plan** proposed in Motion 33. Moreover, insights from the working group proposed in Motion 38 could directly inform stakeholder-specific components of Motion 33’s value proposition analysis.
- Both motions could be coordinated closely or combined to maximize coherence and resource efficiency. Deliverables from Motion 38 may serve as tactical demonstrations of the broader strategic shift outlined in Motion 33. Joint oversight or information-sharing mechanisms between the two implementation processes are advisable.

### 6.2 Alternative 1

#### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

#### 6.2.2 Description

- FSC has started mapping the customer experience. Motion 38 could provide more specificity in considering C&S in TC in FSC’s customer experience and value proposition.

### 6.3 Alternative 2

#### 6.3.1 Status:

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

#### 6.3.2 Description

- The Natural Tropical Forest Priority pipeline already targets growth from communities. This could become the operational anchor to add value to those communities.

## 6.4 Alternative 3

### 6.4.1 Status:

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☒ Already exists

### 6.4.2 Description

- Some country-level initiatives (e.g., Mexico's community-owned forests and local market development) already support aspects of the motion.

## 7 IN A NUTSHELL

- Motion 38/2025 is feasible and strategically aligned with FSC's goals to enhance market relevance, especially among C&S in TC. The motion complements ongoing global initiatives such as the Value Proposition Action Plan, while offering a tangible, community-focused pathway to operationalize FSC's market transformation ambitions.
- The motion is clear in intent and target group, although it leaves room for interpretation regarding implementation structure and resource allocation. It would require sustained investment across global, regional, and local levels—both in staffing and local market development capabilities. A structure that ensures openness and cross-collaboration within FSC units (e.g., Forest Management, Market & Commercial, Global Network, Community & Family Forests, and Advocacy) will be critical to success.
- While the motion requires moderate-to-high resources and a long-term timeline, it presents a strong opportunity to pilot localized value strategies, deepen FSC's presence in priority countries and regions, take internal openness and cross-collaboration within FSC units to a new level, and ultimately strengthen the system's impact.

### 7.1 Key open questions

- Who is the ultimate consumer FSC aims to influence in a B2B2C model—buyers in developed markets or consumers in TC?
- Should FSC focus on local market development in TC, prioritize international trade niches (e.g., EUDR-driven buyers), or both?
- What internal structure (e.g., task force, advisory group, project team) will be most effective for cross-unit implementation?
- What indicators should be used to evaluate success (e.g., market penetration, producer income, buyer engagement)?
- How will FSC secure the financial resources and partnerships necessary for long-term local implementation in tropical regions?
- Can FSC align or merge this motion's outputs with those of Motion 33 to avoid duplication and optimize impact?

39/2025

## INCREASE THE MARKETABILITY OF THE FSC BRAND BY INCLUDING ANIMAL MANAGEMENT PROVISIONS IN THE NORMATIVE FRAMEWORK TO AVOID NEGATIVE PUBLICITY

Edited | Policy Motion

|                                  | Proposed By           | Seconded By      | Seconded By          |
|----------------------------------|-----------------------|------------------|----------------------|
| <b>Name</b>                      | Ian Redmond           | Alan Smith       | Kevin O' Grady       |
| <b>Organization / Individual</b> | Born Free Foundation  | Smith, Alan, Dr. | O' Grady, Kevin, Mr. |
| <b>Chamber / Subchamber</b>      | Environmental / North | Social / North   | Economic / North     |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

In order to prevent FSC being associated with instances of cruel or unnecessary mortality of vertebrate wildlife, whether by accident or design,

1. The organization/certificate holder shall commit to minimize negative impacts on vertebrate animals naturally occurring within a Management Unit (be it plantation or other forest type), including those that do, or may, cause damage to tree species.
2. The organization/certificate holder shall recognize that lethal control should only be considered when all other management alternatives have been exhausted, and ensure this through the demonstrable implementation of a decision-making process to assess non-lethal management options, such as deterrents or the provision of alternative habitats, before resorting to lethal control.

Note: Where control in this context is defined as: “the regulation or management of a species”. This would not apply to legal, well-regulated hunting for food under license as part of a management plan for non-protected species such as deer, and subsistence hunting by indigenous people.

3. If non-lethal management options are not possible within the Management Unit, lethal control measures used must be selected with a view to minimizing animal suffering to vertebrates.

#### Specifications for implementation:

1. To be included within existing FSC standards as appropriate.
2. When terrestrial vertebrate species (including those considered as ‘pest species’ or ‘vermin’) utilise commercially valuable trees whether in plantations, intact forests or production forest:
  - i. If mitigation methods are not possible, control measures should be humane and, where possible, non-lethal, including the provision of alternative habitats consistent with IFC PS6 paragraph 10 “offsets should be designed and implemented to achieve measurable conservation outcomes that can reasonably be expected to result in no net loss and preferably a net gain of biodiversity”
  - ii. On no account should lethal control methods be used for species categorised as ‘threatened’ on the IUCN Red List.

A demonstrable decision-making process for wild animal management should be in place, including an adaptive management system for ongoing monitoring and review, in order to comply with certification and auditing; this can be developed in conjunction with organizations or academic institutions with expertise in the field.

3. Additional training tools for certification and auditing bodies to be developed in collaboration with those members and/or other organizations and academic institutions with expertise in this field.

#### Background Information and Key Documents:

Animal welfare is one of the top consumer issues and is already a major concern for retailers and consumer groups especially in the food sector. When a leading sustainability brand like FSC is linked to an animal welfare issue (e.g. controversies surrounding bushmeat, lethal control of baboons, koala mortality, possum control and logging in the breeding season), this results in significant negative publicity which reverberates among consumers and through them into retailer supplier approval conditions. It is inevitable that the supplier approval conditions will acknowledge animal welfare and in the event that there is a future animal welfare issue in world forestry, especially for FSC certified forests, then this will again impact tremendously on the FSC brand.

FSC members operate within the law. Many governments have legislation in place to prevent cruelty, and international agreements which may impact, affect or otherwise relate to animals normally include provisions to ensure high standards of animal welfare. This Motion aims to bring FSC policies in line with this widely accepted approach to animal management, including in countries which do not have such

legislation.

All that would be required is for FSC to adopt established criteria for determining the necessity for, and methods of, wildlife interventions. The [International Consensus Principles for Ethical Wildlife Control](#)\*, Dubois et al, 2017, provides a framework for such criteria, which could be incorporated within the GSP for adoption and implementation across FSC-certified concessions. These Principles do not exclude the use of wildlife controls; rather they provide a framework for the consideration of whether controls are necessary, and a decision-making mechanism to ensure that any controls minimise adverse implications for individual animals and the populations of which they form a part.

The FSC standards already cover some of the areas envisaged by this motion, e.g. HCV and Pesticides policy, but responsible animal management is not specifically considered and the high-profile cases and negative publicity we have previously experienced in FSC certified Forest, will continue to damage the FSC Brand

Including high and consistent standards of animal management in the standards will boost the public perception of the FSC brand and the certified forest industry whereas inaction may be perceived as indifference. As a focus on animal welfare develops there are potentially many opportunities to promote the FSC brand on the basis of animal welfare.

FSC-certified concessions are increasingly important and internationally recognised as actual and potential habitats for declining wildlife populations (e.g. FSC forests are an indicator in the UN's Global Biodiversity Framework), and the adoption of a clear, ethical and responsible approach to animal management within concessions will go a long way towards helping FSC promote itself as a truly ethical and sustainable brand.

\*Dubois et al, 2017 <https://conbio.onlinelibrary.wiley.com/doi/full/10.1111/cobi.12896>

[Dubois\\_et\\_al-2017-Consensus Principles.pdf](#)

[39-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[39-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[39-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**39/2025**

**Increase the marketability of the FSC brand by including animal management provisions in the normative framework to avoid negative publicity**

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- FSC is not associated with instances of cruel or unnecessary mortality of vertebrate wildlife, whether by accident or design. Additionally, the public and consumer perception of FSC is preserved by ensuring ethical animal welfare is integrated into the certification process.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- New requirements have been introduced in relevant FSC standards regarding animal welfare management, with an emphasis on avoiding lethal control methods.
- Training tools are developed for certification bodies to support the implementation of the new requirements on animal management.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- Not provided.

### **2.2 Contribution to Global Strategy**

- The motion could contribute “Growing our reach: FSC’s 2026 Objective”
- The motion could contribute towards Strategy 1 and goal 1.4 “Expand the reach of FSC and its relevance in the fight against climate change and loss of biodiversity”.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion is generally clear in its intention. However, it would be crucial to specify which FSC standards it is expected to impact. Additionally, more clarity is needed regarding its expectations for the training tools for certification bodies and defining subsistence hunting.

## **4 FEASIBILITY OF IMPLEMENTATION**

### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months  
☐ 6 months – 1 year  
☒ 1 – 3 years  
☐ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

- A technical working group for the revision of the corresponding normative documents to introduce new requirements for animal welfare provisions would need to be in place.
- A dedicated FSC staff member to lead the standard development work and its ongoing implementation.

### 5 BENEFITS / IMPACT

#### 5.1 Expected impacts of the motion

- The implementation of this motion could have a positive impact on consumers' and conservation groups' perceptions, as FSC would more directly acknowledge animal welfare. Marketing campaigns could be branded as cruelty-free.
- However, the implementation of this motion could have potential negative consequences, including the creation of additional requirements and costs for certificate holders, including those managing SLIMFs and community forests.

#### 5.2 Synergies with work underway:

- None identified.

### 6 ALTERNATIVES

#### 6.1 Connections to other motions:

- None identified

#### 6.2 Alternative 1

##### 6.2.1 Status

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

### 6.2.2 Description

- If approved this motion could be integrated into the ongoing revision of [Joint revision of FSC Principles and Criteria, International Generic Indicators, and other Forest Management normative documents](#) to avoid having a separate working group implement this motion.

## 6.3 **Alternative 2**

### 6.3.1 Status:

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

### 6.3.2 Description

Instead of introducing normative elements to the FSC standards, the following could be considered:

- Awareness-raising campaigns on animal welfare could be launched by the regional/national FSC offices and tailored to local needs.
- Introducing best practices for pest animal treatment into FSC's [Integrated Pest Management Guide](#).

## 7 **IN A NUTSHELL**

- The motion is clear in its intent to strengthen the FSC brand by ensuring that FSC is not associated with cruel treatment of wild animals. It would be critical to clarify which FSC standards the motion would impact. Legal, well-regulated hunting for food under license as part of a management plan for non-protected species, and subsistence hunting by indigenous peoples is not affected by the motion.

### 7.1 **Key open questions**

Some elements in the motion seem to be open such as:

- Which standards would this motion affect? Is it the International Generic Indicators? If it is planned to impact the Principles and Criteria, it would be a statutory motion.
- What should be the contents of the training tools for certification bodies?
- What is the definition of subsistence hunting?

## 41/2025 DEVELOP FSC FM CONTRACTOR CERTIFICATION STANDARD

Merged | Policy Motion

|                                  | Proposed By                              | Seconded By           | Seconded By      |
|----------------------------------|------------------------------------------|-----------------------|------------------|
| <b>Name</b>                      | Apolinar Tolentino                       | Elvis Nsoh Ndam       | Manoj Sahu       |
| <b>Organization / Individual</b> | Building and Wood Workers' International | Nsoh Ndam, Elvis, Mr. | Sahu, Manoj, Mr. |
| <b>Chamber / Subchamber</b>      | Social / North                           | Environmental / South | Economic / South |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025. The motion was merged with motion 40.**

In the interest of accelerating global certified forest management growth and promoting efficiencies in the certification process by recognizing the different responsibilities between the forest owner, forestry operator/management and contractors, the FSC Board shall develop a standalone FSC FM Contractor Certification Standard as a major process type as described in FSC\_PRO-01-001 (V4).

The FSC shall consider:

1. Efficient pathway for contractors to enter FSC system
2. Specification of applicable requirements for forest contractors
3. Innovative and efficient ways to use the expertise of contractors in the implementation and streamline of FSC FM standard
4. That the standard alone will not lead to an on-product label or output claims

### Background Information and Key Documents:

#### Problem Context

A lot of the actual work in the forest operations is by specialised companies and self-employed people. They are called contractors, and their work ranges from planting, pruning and harvesting. Contractors are undertaking the most risky types of activities in the forest, such as logging and skidding, which are hazardous for the workers and if wrongly executed may harm the natural forest environment. While forest owners are often depending on the work of contractors, many of the owners lack the expertise and capacity to oversee the contractors' work, including compliance to certification requirements.

Evidently from the publicly available FM certification audit reports, quite a high number of non-conformance of Criteria 2.3 on health and safety practices and worker's rights globally referred to the contractors' operations.

At the same time, current global trends in the forest sector challenge forestry operators – from smallholders to large enterprises – to become more efficient and competitive.

Amidst the lack of clear guidance on certification in the Congo Basin, decline of certified forest areas in North America, financially striving forest loggers in Latin America, the question on FSC certificate value proposition remains open on the table.

Certification audit costs are considered burdensome and in the recent decade FSC was constantly striving to explore innovative solutions on how to strategize its certification toward cost-effective and outcome-oriented while maintaining its system integrity.

This motion is aligned with Global Strategy Goals:

- 1.1: Engage members and stakeholders to drive change as a community for co-creation of solutions;
- 1.2 Streamline policies and standards towards outcome orientation; and
- 2.4 Scale up benefits for Indigenous Peoples, communities, smallholders and workers

### **Previous Initiatives and Processes**

- Motion 46/2017 on FSC New Approaches Program as a high-level priority for advancing smallholder and community certification aspired for development and implementation of a Contractor Certification scheme, and exploration and implementation of other mechanisms for improving access for smallholders in countries where Contractor Certification is not considered appropriate.

- Following up on M46/2017, [the FSC Working Group that dealt with this issue](#) mentioned an option of creating a standalone forestry contractor certification standard but then it was decided as a first step to include forest contractors in the group certification, FSC Forest Management Groups STD-30-005 V2-1. It is the expectation of the motion proposers that the learnings from the group certification shall be considered for the development of standalone contractor certification standard.

### Limitations of FSC FM Groups Standard

It is observed that FSC FM Groups standard has substantial limitations in addressing forest contractors including but not limited to:

- No specification on which requirements are essential for forest contractors. This lack of explicit mentioning of which requirements inevitably leads to inconsistencies in the application, posing greater risk to system integrity.
- In reality, very few independent contractors could be economically viable with only one group as a client. Such situation may necessitate multiple internal audits for each group, adding costs and efforts that could be avoided if there was independent contractors certificate which would be recognised with a FSC framework.
- The Standard is for use **by Group Entities only**, excluding contractors engaged in the individual FM operations. No specific rulings on contractors are set in both FSC STD-01-001 Principles and Criteria for Forest Stewardship and subsequent National Forest Stewardship Standards, and the FSC STD-01-003 V2-0 on SLIMF (Small or Low Intensity Managed Forests), hence all requirements become the sole responsibility of the FM certificate holder.

### Need for a standalone FM Contractor Certification

Considering the problem context and limitation of FM Group Standard above, there is a need for a standalone FM Contractor Certification based on a subset of relevant IGI, that:

1. Would allow Contractors to be stand-alone FSC contractors certified as well as part of FM group.

2. Encourages contractors to engage more in the certification to facilitate their credibility toward a brand image by making them more easily identifiable, allowing forest operators to select a contractor that is FSC certified.
3. Could simplify outsourcing/contracting under FSC certification especially for smallholders which contributes to FSC certified area growth globally and increase FSC's impact.
4. Potentially reduces cost of the FM forest certificate holder as some operational requirements are covered by certified contractors. See Factsheet published by FSC in 2020 (*link*).
5. Assists Certificate holders especially smallholders in effectively meeting all requirements as laid out in the outsourcing agreements.
6. Makes certified contractors more easily identifiable, allowing forest operators to select a contractor that is FSC certified.
7. Reduces system-integrity risks; certified contractors are bound by FSC policies.

[41-2025\\_Develop\\_FSC\\_FM\\_Contractor\\_Certification\\_Standard\\_V1\\_20250313124701.pdf](#)

[41\\_2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[41\\_2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[41\\_2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**41/2025** Develop FSC FM Contractor certification standard

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- A new standalone FM Contractor Certification Standard is developed to accelerate global certified forest management growth and promote efficiencies in the certification process by recognizing the distinct responsibilities of forest owner, forestry operator/managers and contractors.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- The new FSC contractor certification standard is developed following a major process as described in FSC-PRO-01-001.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- 1.1 Engage members and stakeholders to drive change as a community for co-creation and solutions;
- 1.2 Streamline policies and standards towards outcome orientation;
- 2.4 Scale up benefits for Indigenous Peoples, communities, smallholders and workers.

### **2.2 Contribution to Global Strategy**

- The Motion states that it is aligned with the three Global Strategy Goals described above. However, its contribution to Goals 1.1 and 1.2 is not clear. It may contribute to Goal 2.4 “Scale up benefits for Indigenous Peoples, communities, smallholders and workers”; however, it is unclear if these stakeholders utilize contractors.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion is clear on its ultimate outcome of developing a new contractor certification standard. The revised version of the motion incorporates a problem statement, outlines the limitations of the Group Standard and highlights the need for a standalone FM Contractor Certification. The Motion does not address the implications that a new contractor certification standard would have on the normative framework, including the necessary changes and updates referenced in section 5.1.

## **4 FEASIBILITY OF IMPLEMENTATION**

### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months  
☐ 6 months – 1 year

- ☒ 1 – 3 years
- ☐ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☒ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

- A preliminary study or analysis is recommended to assess the potential uptake and benefits of a new contractor certification standard, including the perspectives and needs of contractors.
- A major process for standard development must be established, including the creation of a chamber-balanced working group.
- A dedicated FSC staff would be required to lead the standard development work and its ongoing implementation.
- Alignment processes may need to be initiated for <[FSC-STD-30-005 Forest Management Groups](#)>, <[FSC-STD-20-007 Specific Requirements for Certification Bodies](#)> depending on the scope and structure of the new contractor certification standard.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- According to Version 2-1 of <[FSC-STD-30-005 Forest Management Groups](#)>, there is an explicit role for forestry contractors, allowing them the option to join the group. However, the stated benefits may not be sufficient to justify the development of a new standalone standard.
- A new contractor certification standard will add a layer to the auditing process of certification bodies.
- Given that contractors can currently be included in the scope of group certification at reduced costs for group members, the new contractor certification standard is likely to introduce or increase certification costs for contractors.
- Other FSC standards may require adaptation, such as evaluation requirements at the contractor level, and any identified changes for the Forest Management (FM) certificate holder. A new eTLA (Trademark License Agreement) may need to be developed, along with a new charging mechanism for the Annual Administration Fee (AAF) Policy. Additionally, the FSC database will require modifications to ensure that the scope of certification is properly displayed.

- A new contractor certification standard may create an imbalance between FM contractors in the Global North and the Global South.
- Increasing contractors' visibility may raise data protection concerns and integrity risks.

## 5.2 Synergies with work underway:

- Further study would be needed to assess the potential uptake and benefits of a new contractor certification standard.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- Motion 40 and Motion 41 have been combined.

### 6.2 Alternative 1

#### 6.2.1 Status

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

- Instead of introducing a new standard to FSC's normative framework, building capacity on the existing flexibilities within Version 2-1 of [<FSC-STD-30-005 Forest Management Groups>](#) regarding forestry contractors could be an alternative.
- A new study assessing in more detail the benefits of developing a stand-alone contractor certification standard could provide additional insights before the standard development begins.

### 6.3 Alternative 2

#### 6.3.1 Status:

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.3.2 Description

- If the ongoing revision of the [<FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship>](#) and [<FSC-STD-60-004 V2-1 International Generic Indicators>](#) introduces a new modular approach focused on the users of forest management standards, a module focused on contractors could be developed to offer more visibility for contractors.

## 7 IN A NUTSHELL

- The motion is clear in its outcome, developing a new contractor certification standard. However, further clarification on the added value this standard would provide to contractors, based on a preliminary study would be critical.
- The anticipated advantages could be further developed to reflect on the potential impacts across the system, including the individual benefits for the contractors and the FSC

system as a whole. A new standard, relevant changes to the accreditation standard, and adaptations to relevant normative standards would not align with FSC's current aim of streamlining the normative framework.

## **7.1 Key open questions**

- What benefits or added value would contractors gain from applying for certification and bearing the associated costs, especially if they currently don't face such requirements?
- The stated advantages are not supported by evidence or based on a clear demand for such a standard. A preliminary cost-benefit analysis assessing which activities of the forest management (e.g., harvesting, pruning, planting) would benefit and could support the development of such a standard, as it is unclear whether it would reduce the cost of certification.
- According to Version 2-1 of <[FSC-STD-30-005 Forest Management Groups](#)>, there is an explicit role for forestry contractors, allowing them the option to join the group. Could building capacity around the possibilities of such a standard help realize the stated benefits proposed in this Motion?

## 42/2025 REVIEW FSC'S ROLE IN OFFSET MARKETS

Edited | Policy Motion

|                                  | Proposed By            | Seconded By               | Seconded By            |
|----------------------------------|------------------------|---------------------------|------------------------|
| <b>Name</b>                      | Patrick Anderson       | Carlos Ortega Ayala       | Grant Rosoman          |
| <b>Organization / Individual</b> | Anderson, Patrick, Mr. | Ortega Ayala, Carlos, Mr. | Greenpeace New Zealand |
| <b>Chamber / Subchamber</b>      | Social / North         | Economic / South          | Environmental / North  |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

FSC shall limit offsetting, compensation or neutralization of residual greenhouse gas (GHG) emissions to organisations inside the FSC value chain and FSC network. These organisations will be able to inset or offset residual GHG emissions subject to a prioritised effort to avoid and minimise their emissions based on the 'mitigation hierarchy'. FSC will set maximum percentages of residual emissions (may differ by sector and with varying social, environmental and economic conditions) based on best available science, including the IPCC (Intergovernmental Panel on Climate Change) and SBTi (Science-Based Targets Initiative). There shall be no FSC biodiversity offsets.

FSC shall undertake a risk-benefit analysis of outstanding aspects of Motion 49 2022 related to the above, and the recent ToRs approved by the BoD to create FSC biodiversity and high-quality carbon credits. The analysis will consider which aspects can provide FSC members, certificate holders, Indigenous Peoples, stakeholders and the environment with significant benefits that have a very low reputational risk for FSC. Meanwhile, FSC shall continue to finalise outstanding safeguard and improvement measures as requested by M49, in particular relating to ensuring Indigenous Peoples' rights and benefit sharing, as well as ensuring the rigor and truthfulness of any claims made by sponsors, or FSC certificate or <sup>TM</sup> licence holders. The secretariat will consult fully with members on the methodologies and normative framework for carbon compensation or neutralization, and the final elements on offsets will be brought to a vote of the FSC membership, either as a separate vote or at the next GA, before implementation.

**Background Information and Key Documents:**

It is well recognised by the membership that there is a need to generate finance for forest conservation within FSC certified management units. Motion 49 was passed at the GA2022 to support the Ecosystem Services Procedure as a means to generate a revenue stream for certificate holders. It included five actions ranging from increasing integrity and benefits to the Ecosystem Services Procedure to allowing offsetting within FSC (referred to as “progress to achieving net-zero, compensation or neutralisation”). Since GA2022, nearly all of the safeguard and benefit-sharing aspects of M49 have been implemented.

However, the offsetting aspect is outstanding for several reasons: firstly, the incorporation of offsetting into FSC is incredibly costly and complex. Secondly, in recent years, major investigations<sup>1</sup> have revealed evidence of problematic land-based offset claims and Indigenous Peoples’ rights being violated, highlighting reputational risks associated with offsetting and leading to a discrediting of offsets, especially compared to other financial support for good forest management. According to the Intergovernmental Panel on Climate Change (IPCC), ecosystem removals [of carbon] are not instead of decarbonization—they must be in addition to decarbonization. Some governments are moving away from forest/land use offset markets, and many NGOs are withdrawing support for such markets linked to forests. Thirdly, while the motion was placed within the context of carbon offsetting, there is now also the added issue of biodiversity offsets, which create further complexities and risks, such as when used by mining operations.

In June 2025, the FSC board endorsed a Terms of Reference for developing Carbon offsets, which leaves open the possibility of such offsets from FSC management units being created and traded, exposing FSC to considerable reputational risks. Considering these changes, FSC shall conduct a thorough analysis, including consultation with its membership, of the risks and benefits that offsetting, credits, and other outstanding Motion 49 measures related to offsets could bring to FSC, forest-dependent peoples, and the world's forests.

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1. E.g. <https://www.theguardian.com/environment/2023/jan/18/revealed-forest-carbon-offsets-biggest-provider-worthless-verra-aoe>

<https://www.bloomberg.com/news/features/2021-08-11/the-fictitious-world-of-carbon-neutral-fossil-fuel>

<https://news.mongabay.com/2021/09/should-tree-plantations-count-toward-reforestation-goals-its-complicated/>

<https://www.theguardian.com/environment/2021/may/04/carbon-offsets-used-by-major-airlines-based-on-flawed-system-warn-experts>

<https://www.theguardian.com/business/2021/feb/11/shell-grow-gas-business-energy-net-zero-carbon>

<https://features.propublica.org/brazil-carbon-offsets/inconvenient-truth-carbon-credits-dont-work-deforestation-redd-acre-cambodia/>

<https://www.pnas.org/content/117/39/24188>

<https://news.mongabay.com/2021/11/bornean-communities-locked-into-2-million-hectare-carbon-deal-they-dont-know-about/>

<https://www.latimes.com/business/story/2023-08-22/carbon-trading-co2-credits>

<https://asia.nikkei.com/Spotlight/Environment/Climate-Change/Indonesian-carbon-credit-project-appears-to-betray-its-purpose>

<https://australiainstitute.org.au/post/carbon-credits-and-offsets-explained/>

<https://www.sciencedirect.com/science/article/pii/S258979182500026X>

<https://carbonmarketwatch.org/2023/07/06/does-carbon-offsetting-do-more-harm-than-good/>

[42-2025\\_Final\\_Feasibility-assessment\\_ENG.pdf](#)

[42-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[42-2025\\_Final\\_Feasibility-assessment\\_ENG.pdf](#)

[42-2025\\_Review\\_FSC\\_s\\_Role\\_in\\_Offset\\_Markets\\_V1\\_20250313121755.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**42/2025** **REVIEW FSC'S ROLE IN OFFSET MARKETS**

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

**1 ENVISAGED OUTCOME AND DELIVERABLES**

**1.1 Stated or Assumed Outcome**

- 1.2** 1) The motion calls for limiting offsetting, compensation, or neutralization of residual greenhouse gas (GHG) emissions to organizations that are part of the FSC value chain and network, and for placing a cap on the emissions eligible for compensation.
- 2) Furthermore, the motion requests a focused risk-benefit analysis of the remaining aspects of Motion 49/2022, aiming to identify those with high benefit and low reputational risk.
- 3) Work on the development of carbon and biodiversity credit frameworks would continue, but additional consultation and member approval of final element on offsets is requested.

**1.3 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

FSC would restrict offsetting, compensation, or residual GHG neutralization to organizations within the FSC value chain and network, subject to a cap and compliance with the mitigation hierarchy. No biodiversity offsets would be permitted under FSC. A risk-benefit analysis of outstanding elements of Motion 49/2021 would guide further progress, identifying those aspects most beneficial and least risky for members, certificate holders, and stakeholders. Meanwhile, FSC would continue finalizing requested safeguard and improvement measures, contingent upon extensive member consultation, and any final elements on offsets would be subject to an FSC member vote before proceeding.

**2 FSC GLOBAL STRATEGY 2021-2026**

**2.1 Link to Global Strategy**

- Not provided

**2.2 Contribution to Global Strategy**

Though the motion does not directly align with a particular specific goal, it could contribute to Goal 1.4 (expanding FSC's reach and relevance in addressing climate change and biodiversity loss) and Goal 2.2 (accelerating market uptake of FSC-certified products and ecosystem services). However, the additional procedural steps and safeguards required by this motion could introduce challenges or unintended impacts, potentially slowing FSC's pace and effectiveness in climate and biodiversity markets.

**3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion provides specific direction on the steps FSC should take.
- The term "FSC Network" lacks clear definition. Clarification is needed as to whether this refers to FSC CoC certified organizations, FSC members, license holders, or another group.

- The motion expresses support for finalizing certain aspects of Motion 49 specifically, the “outstanding safeguard and improvement measures.” FSC interprets that the development of these crediting frameworks and methodologies is part of the safeguarded measures referenced.
- It requests that final decisions on offsets be subject to a membership vote. FSC interprets that the final membership vote covers only the final use of credits for offsetting (claims or communication).

**3.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

**3.2 Estimated one-time costs:**

**3.3 Estimated one-time costs:**

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

**3.4 Estimated ongoing costs (per year):**

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

**3.5 (Pre)conditions for implementation**

Technical expert for conducting thorough analysis of the risks and benefits that offsetting, credits and other outstanding Motion 49 measures related to offsets could bring to FSC, forest-dependent peoples and the world's forests.

## **4 BENEFITS / IMPACT**

**4.1 Expected impacts of the motion**

The measures outlined in the motion would enable FSC to make well-informed decisions by carefully evaluating reputational risks associated with offsetting claims, while also considering potential benefits for certificate holders and stakeholders. However, strictly limiting the pool of eligible organizations and requiring additional procedural steps (membership vote) could impede broader market uptake of credits and delay the establishment of operational frameworks for carbon and biodiversity credits. This could, in turn, diminish FSC's timeliness and relevance in emerging Nature-based Solutions markets.

## 4.2 Synergies with work underway:

- The motion builds upon Motion 49 and essentially calls for a reduction in its scope and additional research and approval process before moving on with offsetting/compensation. FSC has made significant progress with the implementation of Motion 49, having conducted comprehensive risk and benefit analyses during the conceptual phase. This included interviews with a wide range of stakeholders, public consultations, as well as technical and market analyses. The final report of this analysis, completed in February 2025, can serve as part of the deliverables for this motion. It includes recommendations on the acceptable approaches to proceed with, such as the limited use of carbon credits, the implementation of biodiversity credits, and the suspension of our engagement of biodiversity offsets and water offsets.
- The process of developing FSC carbon and biodiversity credits frameworks has already started and it will fully follow FSC-PRO-01-001 Development and Revision of FSC Requirements and will include two public consultations, in line with the strong requirements for stakeholder engagement outlined in this document. These consultations will provide opportunities for FSC members, etc, and other stakeholders to share their views/opinions and suggestions/recommendations.

## 5 ALTERNATIVES

### 5.1 Connections to other motions:

- Not identified

### 5.2 Alternative 1

#### 5.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

#### 5.2.2 Description

An alternative approach to this motion would be to:

- Limit the use of the offsetting, compensation or neutralization of residual greenhouse gas (GHG) emissions to organisations from the land intensive sector, following SBTI's Forest, Land and Agriculture targets, excluding mining, following FSC policy of association and mitigation hierarchy
- Use the cost-benefit analyses already done. During the conceptual phase related to Motion 49/2021, an in-depth analysis and report have already been prepared. The final report/analysis assessed the risks, benefits of different possible solutions to address the requests of Motion 49/2021 and therefore of this Motion as well. The report already recommends best way for FSC to approach the implementation of the outstanding topics, especially the benefits of establishing a functional system for carbon and biodiversity credits
- Instead of bringing the final elements on offsets for membership vote, we could simply follow the FSC well established processes including procedure FSC-PRO-01- 001 as mentioned above and the public consultation process already planned or alternatively establish expert committee from the membership to ensure the final work does not constitute of major reputation and integrity risks.

## 6 IN A NUTSHELL

- The motion provides clear focus on what FSC should prioritize in offsetting, compensation, or neutralization but proposes a reduction in scope, additional analysis, and further approval layers.
- It does not fully consider the thorough technical and market analyses already completed (February 2025), which provide insights for path forward.
- While these measures could help balance risk and benefit, the process proposed in the motion would probably lead to additional delays and affect the efficiency of service delivery (as outlined under Alternative 1 above). It is worth noting that FSC has already conducted a thorough risk-benefit analysis and extensive consultation. As a result, repeating this process may offer limited new insights or added value, and could extend timelines for implementing needed solutions.
- The fact that the motion is asking for additional vote from the membership gives the impression that the proponents does not rely on the robustness of FSC's normative document for development and revision of FSC requirements (2 public consultations, PSC, PSG and Board approvals) i.e., SC-PRO-01-001 Development and Revision of FSC Requirements. Also, the motion already propose major reduction of the use of offsetting/compensation claims and therefore additional vote might just bring unnecessary burden and delays.
- FSC is not a target-setting body like the SBTi, which supports companies in developing and validating targets based on IPCC pathways that then lead to the determination of residual emissions. The concept of residual emissions is also broad and lacks clear definition, as it may vary from one entity to another and would therefore require clarification.

### 6.1 Key open questions

- The motion intends to protect FSC against both reputational and operational risks and reflects well the changes on the market since GA 2022. However, the approach may create excessive restriction, market limitations, and process redundancies. Equivalent rigor could be achieved via less restrictive means, such as strict sector exclusions (positive VS negative list), robust due diligence system, and adherence to the mitigation hierarchy.
- Furthermore, the proposal for a separate vote on the final elements of offsets by the membership, appears to exceed standard FSC decision-making procedures. Given that Motion 49/2022 has already been approved and followed by consultations and conceptual phase processes, an additional round of voting introduces redundancy and added complexity. FSC's procedures already ensure that concerns from members or stakeholders can be raised, discussed, and addressed through public consultation, expert input, and decision-making bodies. Adding further procedural layers may undermine efficiency and responsiveness, qualities that are essential for FSC's credibility and relevance in rapidly evolving environmental markets.

43/2025

## STRENGTHENING IDENTIFICATION, PROTECTION AND MONITORING OF FOREST HCVS (1-6)

Edited | Policy Motion

|                                  | Proposed By                              | Seconded By           | Seconded By              |
|----------------------------------|------------------------------------------|-----------------------|--------------------------|
| <b>Name</b>                      | Tim Cronin                               | Richard Donovan       | Maria Tysiachniouk       |
| <b>Organization / Individual</b> | World Wide Fund for Nature International | Donovan, Richard, Mr. | Tysiachniouk, Maria, Dr. |
| <b>Chamber / Subchamber</b>      | Environmental / North                    | Economic / North      | Social / South           |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

FSC shall systematically review and strengthen protection of HCVs (1-6), improve monitoring, and decrease variability in the requirements on HCVs through the National FM standards, the International Generic Indicators (IGIs), and, depending on the scale of the forest management operation, make HCV maps and analysis mandatory part of the public summary Management Plans. HCV assessments, authors, local experts and reviewers, and revisions over time shall be made public, except when making information public on a particular HCV would endanger it (e.g., location of antiquities, etc.), or data sensitive for IPLCs without receiving their consent for publishing.

Issues to address:

- Variability in National standards' requirements on HCV assessments.
- Poor transparency in assessment procedure and reporting of CBs and CHs.
- HCV maps are unavailable, particularly for Type 2 HCVs (which are typically area-based).

- Best practices and approaches to HCV assessments, including identifying HCVs and strategies for maintaining them, are unavailable to be replicated in similar landscapes and geographies, and,
- HCV data are not aggregated on a landscape- and country level, which prevents the use of HCV data for nominating those HCV areas as “Other Effective Conservation Measures” (OECMs) and further reporting under national obligations within the Convention on Biological Diversity or under the European Union Deforestation Regulation (EUDR) compliance.

### **Background Information and Key Documents:**

The system of identification, protection and monitoring of HCVs was integrated within the FSC standards from the outset, to ensure that high conservation values (environmental, social, indigenous or others) within FMUs are not destroyed because of forest management activities. The efficiency and effectiveness of HCV identification, protection, and monitoring is inconsistent, and often poor, for several reasons. First, HCV identification and monitoring can vary from country to country and within countries, since HCV assessments are carried out by individual FSC CHs or applicants. Although many National standards have requirements for public accessibility of HCV data, there are no clear, rigorous or consistent requirements on transparency for HCV data (a clear and positive exception being the FSC National Forest Stewardship Standard – NFSS – for Canada).

Accessibility to HCV data depends on the transparency of reporting on HCVs and how the system of assessment, reporting and monitoring is structured. HCV reports should explicitly indicate who produced the HCV assessment, what key local, technical stakeholders/experts were consulted to ensure high technical quality and rigor, as well as a description of those HCV areas and management measures that are taken to protect HCVs. Transparency and accessibility of data should also help improve the quality of HCV assessments. This is especially important for assessments conducted within the boundaries of a single landscape, geographical area or neighboring FMUs, where assessment conclusions may vary significantly depending on skills and approaches of experts and certification bodies. Such differences may result in the loss of natural values in one part of a landscape, while a company continues holding a certificate.

FSC-IC, particularly Regional Offices and National entities, should play a more active role in supporting and monitoring the quality of HCV assessments and promoting best practices.

FSC should also consider accumulating and aggregating HCV data at landscape and country levels. This should help to establish a system for nominating HCVs as OECMs as part of governments' commitments to the Global Convention on Biodiversity. Such an approach would facilitate data systematization and encourage governments to promote FSC, which would ultimately ensure the long-term protection of HCVs.

The FSC IGI/P&C revision process represents a critical opportunity for addressing the issues listed in the Motion, including to improve the quality, consistency, transparency and aggregation of HCV data, both within and beyond FMUs.

[43-2025\\_Protection\\_and\\_Monitoring\\_of\\_Forest\\_HCVs\\_V1\\_20250814092315.pdf](#)

[43-2025\\_Final\\_Feasibility\\_Assessment\\_ENG.pdf](#)

[43-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[43-2025\\_Final\\_Feasibility\\_Assessment\\_FRA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**43/2025** Strengthening identification, protection and monitoring of forest HCVs (1-6)

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- Identification, protection and monitoring of HCVs is strengthened and systematically reviewed. Further: A more consistent application of HCV requirements in Forest Stewardship Standards (FSS) is provided; HCV maps and analysis are presented in the public summary of management plans; HCV assessments, authors, local experts and reviewers, and revisions over time are made public (except for information which could endanger the HCV or information which lacks IPLC consent for publication) by the CBs and CHs.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- a) FSC has established a mechanism to systematically review the identification, protection and monitoring of HCVs across the FSC certified forests
- b) FSC has secured consistency of HCV requirements in FSS:s
- c) FSC has made it mandatory to present the HCV maps and the HCV analysis in the public summary of management plans
- d) FSC has made it mandatory to present the HCV assessments, authors, local experts and reviewers, and revisions over time in the public summary of management plans and in the public summary audit reports (except for information which could endanger the HCV or information which lacks IPLC consent for publication).
- e) FSC has established a mechanism to ensure that the best practices and approaches to HCV assessments and the best strategies for maintaining them are made available to be replicated in similar landscapes and geographies
- f) FSC has established a mechanism to provide aggregated HCV data on a landscape- and country level for nominating those areas as "Other Effective Conservation Measures" (OECMs)

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- None

### **2.2 Contribution to Global Strategy**

- The strengthened identification, protection and monitoring of HCVs contributes to "Achieving our 2025 vision": - "FSC will increase its focus in regions and countries that have significant areas of high conservation value"
- The motion does not directly contribute to a specific goal. However, some contribution could be claimed towards Goal 1.3 Enhance verification and integrity, 1.4 Expand the reach of FSC and its relevance in the fight against climate change and loss of biodiversity and Goal 2.1 "Advance FSC in value chains that have the highest potential for contributing towards our 2050 vision", which has following intended outcome: "Uptake of FSC certification is increased"

in the prioritized value chains, particularly in tropical and high conservation value forest regions”

### **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion is clear and specific regarding which aspects of the FSC certification system should be improved in order to strengthen the identification, protection and monitoring of HCVs
- Some elements in the motion leaves it open what would constitute a satisfactory level of improvement, particularly the requests on:
  - Establishing a mechanism to ensure that the best practices and approaches to HCV assessments and the best strategies for maintaining them are made available to be replicated in similar landscapes and geographies
  - The consistency of HCV requirements in FSS:s

### **4 FEASIBILITY OF IMPLEMENTATION**

#### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☐ 1 – 3 years
- ☒ More than 3 years

#### **4.2 Estimated one-time costs:**

- ☐ Up to 10.000 EUR
- ☒ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### **4.3 Estimated ongoing costs (per year):**

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☒ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### **4.4 (Pre)conditions for implementation**

- Deliverable 1.2.a) “establishing a mechanism to systematically review the identification, protection and monitoring of HCVs across the FSC certified forests”, likely requires hiring new staff.
- Deliverables 1.2.e) and 1.2.f) require new or additional funding to the existing resources in the secretariat.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- The proposed measures are well designed to strengthen the identification, protection and monitoring of HCVs within the FSC certified forests, which would improve the integrity and credibility of the FSC system. Providing more information on HCVs in a public domain is likely to enhance the protection of HCVs also in the wider landscapes outside of certification.
- An unintended consequence of the motion could be that the higher requirements for HCV management and publicity could increase the burden for the certificate holders

### 5.2 Synergies with work underway:

- Revision of requirements for Intact Forest Landscapes (IFL) conservation
- Joint revision of FSC Principles and Criteria, International Generic Indicators, and other Forest Management normative documents
- Revision of Requirements for the Development and Maintenance of FSC Country Requirements (FSS and FSC RAs)
- Phase 2 of the revision of the Ecosystem Services Procedure: Implementation of Motion 49/2021
- Investigations on destruction of HCV areas: Policy for Association Cases

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- M31/2025 Strengthening the integrity of the FSC brand
- M44/2025 Revision of FSC's approach to Intact Forest Landscapes (IFLs) to integrate a dynamic and contextual perspective
- M45/2025 Impactful Intact Forest Landscape Conservation

### 6.2 Alternative 1

#### 6.2.1 Status

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

- Deliverable 1.2.b) could be addressed through the Revision of Requirements for the Development and Maintenance of FSC Country Requirements (FSS and FSC RAs)
- Deliverables 1.2.c) and 1.2.d) could be addressed through the Joint revision of FSC Principles and Criteria, International Generic Indicators, and other Forest Management normative documents

## 7 IN A NUTSHELL

- The proposed measures are well designed to strengthen the identification, protection and monitoring of HCVs. In general, they would improve the integrity and credibility of the FSC system.

## **7.1 Key open questions**

- Some elements in the motion leaves it open what would constitute a satisfactory level of improvement, particularly the requests on:
  - What data needs to be collected for establishing a mechanism to ensure that the best practices and approaches to HCV assessments and the best strategies for maintaining them are made available to be replicated in similar landscapes and geographies
  - the consistency of HCV requirements in FSS:s

45/2025

**MOVING BEYOND FIXED THRESHOLDS TO OUTCOME-BASED CONSERVATION FOR INTACT FOREST LANDSCAPES (IFLS)**

Edited | Policy Motion

|                           | Proposed By           | Seconded By           | Seconded By                       |
|---------------------------|-----------------------|-----------------------|-----------------------------------|
| Name                      | Joeri Zwerts          | Richard Donovan       | Ernesto Rafael Marval Muñoz       |
| Organization / Individual | Zwerts, Joeri, Mr.    | Donovan, Richard, Mr. | Marval Muñoz, Ernesto Rafael, Mr. |
| Chamber / Subchamber      | Environmental / North | Economic / North      | Social / South                    |

**Policy Motion (Motion text / High-level action request):**

*Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.*

As ecological, environmental, social and economic conditions vary widely among Intact Forest Landscapes (IFLs); and to remain a credible and effective force for their conservation, FSC shall adapt its approach—replacing fixed IFL protection thresholds with environmentally, socially and economically equitable, viable, context-sensitive and dynamic forest management practices that conserve ecosystem integrity and socio-cultural values within Forest Management Units (FMUs).

The original binary classification (intact vs. non-intact) does not reflect the full spectrum of intactness or the capacity of forests to recover and sustain economic and socio-cultural values. This motion therefore recognizes intactness as dynamic.

The revised approach shall align with and strengthen FSC's High Conservation Values (HCV) framework, which allows active management provided HCVs are maintained or restored. IFLs as of 1 January 2017 are designated 'HCV-2 plus' areas, requiring additional management and robust monitoring measures beyond those applied to other HCV-2 areas, to support outcome-based adaptive management.

FSC Regional/National offices and Standard Development Groups (SDGs) shall facilitate consultations with forest managers, Indigenous Peoples (IPs), Local Communities (LCs), other rights-holders, scientific institutions, and NGOs, ensuring their meaningful involvement in developing landscape specific management and monitoring approaches and indicators, verifying IFL classifications, and assessing whether the approach effectively conserves HCVs and maintains the integrity of IFLs.

*To successfully implement this high-level action request, the policy implementation process shall take into account in particular the following:*

## 1. Management

- a. **Forest management activities designed to maintain and/or restore the ecological integrity and socio-cultural values of IFLs replace fixed IFL protection thresholds with immediate effect.** FSC, through its Regional/National offices and SDGs, develops normative requirements and guidance outlining best management practices for IFLs, aiming for consistency across ecoregions, to standardize and streamline implementation across FMUs.

1. Ecological integrity refers to maintaining resilient forests where biological diversity and abundance are preserved, allowing ecosystems to recover from local disturbances caused by forest management.
2. Landscapes are, for the purposes of this motion, defined as areas with shared ecological characteristics, as for example outlined in the ecoregions framework (ref. 1).

- b. **Indigenous Peoples (IPs) and Local Communities (LCs) recognized as rights-holders in IFLs are meaningfully involved to assess whether forests are correctly classified as**

IFLs, or, if actually used or inhabited, classified as Indigenous Cultural Landscapes. IPs and LCs are also consulted to provide local and traditional knowledge relevant to the implementation of Clause 1a. These consultations will be done in accordance with Free, Prior, and Informed Consent (FPIC) protocols, ensuring the protection of community rights and values.

- c. A technical working group will design a **tiered structure of responsibilities**, based on management unit size and adapted to landscape context (for examples see Table 1).

**Table 1.** Example of a tiered responsibility structure for Clause 1c, based on management unit size and adapted to landscape context, as will have to be developed by a technical working group.

| Criteria                                 | Large Operators                                                                                                                   | Small/Community Operators                                                                                                    |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| <b>Monitoring Design</b>                 | Co-develop and/or co-fund landscape specific indicators and HCV assessments.                                                      | Use standardized templates and guidance developed at the landscape level.                                                    |
| <b>Biomonitoring Implementation</b>      | Implement full spatially replicated BACI or similar designs.                                                                      | May apply simplified or proxy-based monitoring tools, possibly with third-party or cooperative support.                      |
| <b>Financial Contribution</b>            | Proportional contribution to shared costs of assessment and data collection at landscape level (e.g., through a monitoring fund). | Contributions adjusted or waived based on economic scale; in-kind support (e.g., community data) encouraged.                 |
| <b>FPIC &amp; Stakeholder Engagement</b> | Demonstration of formal FPIC compliance processes for affected communities.                                                       | Supported through local institutions or FSC facilitation to ensure meaningful participation without administrative overload. |
| <b>Reporting Timelines</b>               | Strict adherence to predefined reporting deadlines.                                                                               | Flexibility in timelines allowed where justified by capacity limitations.                                                    |
| <b>Training &amp; Support</b>            | Expected to provide or fund training to smaller operators within shared landscapes.                                               | Eligible for FSC or donor-supported capacity-building and technical assistance.                                              |

- d. The provisions of this motion remain applicable to IFLs as defined on 1 January 2017, ensuring that their special status under HCV2 is maintained—for example, according to the delineation available at <https://intactforests.org/world.webmap.html> (ref. 2).

## 2. Monitoring

a. FSC, through its Regional/National Offices and SDGs, develops **monitoring requirements and guidance** for IFLs, aiming for consistency across ecoregions, to standardize and streamline implementation across FMUs, utilizing national biodiversity frameworks where applicable. The requirements and guidance are intended to strengthen context-specific HCV baseline assessments, indicator selection, and adaptive monitoring systems for IFLs and to constitute practical tools for **standardized, consistent data collection**—ensuring robustness, credibility, and comparability across FMUs while reducing barriers to certification. Development and rollout timelines are set for each landscape to guarantee accountability throughout the implementation process.

b. Ecosystem integrity is monitored using **under-the-canopy ecological indicators** and established scientific methods, employing spatially replicated BACI (Before-After-Control-Impact) or alternative designs exemplified in Table 2, and can be built upon current continuous inventory methods in place in attendance to P8, to assess the effects of forest management on habitat condition and species populations. The resulting data will provide credible evidence of whether species populations and/or ecosystem function recover and/or remain stable in the FMU and to what extent these outcomes are attributable to forest management activities.

1. If flaws or inaccuracies are identified on Clause 2a or with the applied monitoring designs, non-conformity(ies) are issued by the responsible Conformity Assessment Body.

2. Monitoring follows strict, **predefined timelines** for implementation and reporting.

**Table 2.** Examples for monitoring design options for Clause 2b.

| Method                                       | Description                                                                                                                                   | Strengths                                                                                            | Limitations                                                             |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| <b>BACI (Before–After–Control–Impact)</b>    | Compares conditions before and after management, with both control and impact sites.                                                          | Strongest design for detecting cause–effect relationships.                                           | Resource-intensive; requires true control sites and baseline data.      |
| <b>Control / Reference-site comparisons</b>  | Compares managed sites with either paired control sites or broader benchmark/reference sites.                                                 | Practical and widely used; provides a counterfactual or standard of ecological integrity.            | Controls/references may not be perfectly comparable to managed sites.   |
| <b>Gradient / Impact–Gradient designs</b>    | Assesses impacts across a spectrum of management intensities (Gradient) or along distance/intensity from a specific impact (Impact–Gradient). | Captures dose–response relationships; works without strict controls; can focus on high-impact areas. | Can be confounded by unmeasured differences among sites.                |
| <b>Before–After / Time-series monitoring</b> | Tracks changes at the same site(s) over time, either as simple before–after or extended time-series.                                          | Detects site-level change and long-term trends; can reveal delayed effects.                          | Hard to separate management impacts from broader environmental changes. |

c. Economic viability is key to successful implementation of requirements. To ensure cost-effectiveness and feasibility, FSC Regional/National offices and SDGs specify landscape specific indicators in consultation with experts and stakeholders. Biomonitoring is targeted, objective-driven, and based on indicators sensitive to the direct or indirect effects of forest management, focusing on areas with the highest risks of biodiversity loss. **Indicator selection considers:**

1. The **species' vulnerability** to direct and/or indirect impacts of logging;
  2. The **ecological role** of species and whether these species serve as proxies for other species populations (for example keystone species);
  3. That the populations of these species are **monitorable** with methods that are scalable, cost-effective, humane and scientifically reliable. Priority is given to semi-automated methods, such as camera traps and bioacoustics, that integrate into automated analysis pipelines to enable scalable and standardized monitoring with robust spatial and temporal replication (ref. 3).
3. **Outcome based adaptive management** (as required under Criteria 7.4, 8.1–8.3, and 9.4, with emphasis on robust implementation in IFLs).

- a. Forest managers **periodically review** and revise IFL management approaches based on ecological and social monitoring results.
- b. Mechanisms are established to integrate stakeholder input—especially from Indigenous Peoples and local communities—into **adaptive management** processes. FSC Regional/National offices and SDGs support the creation of these mechanisms.

## Background Information and Key Documents:

### Purpose

This motion provides a **workable, outcome-based** approach to resolving the IFL debate. These changes **will enhance FSC's reach and positive impact on global IFLs**, while aligning with FSC's strategy of increasing certification and reducing complexity to ultimately:

1. Strengthen conservation outcomes;
2. Ensure IPs and LCs recognized as rights-holders are involved in validating IFL boundaries;
3. Retain FSC's relevance and leadership in tropical and boreal forests.

### Strategy link

The motion contributes to the implementation of Strategy Goals 1.1, 1.2, 1.3, 1.4, 2.3, and 2.4.

### Rationale

Ten years of IFL discussions within the FSC have failed to yield tangible biodiversity protection or inclusion of socio-cultural values in these critical landscapes. Instead, they have resulted in barriers to certification in both tropical and boreal forests. FSC's current approach, centred around thresholds for strict protection, has proven largely unworkable economically and socially.

While protecting the ecological and social values of IFLs is essential and strict protection of IFLs should continue to be a priority, overly rigid and unclear requirements make FSC certification unappealing to forest managers, erode support from Indigenous Peoples and Local Communities, push operations toward weaker standards—or even away from certification entirely—and ultimately compromise conservation goals. Without adapting its approach, FSC will lose its relevance in these key forest regions, undermining its ability to conserve biodiversity in IFLs through robust management standards.

Currently, only 0.6% of global IFLs are FSC-certified, and FSC has virtually no reach or impact in global IFLs (ref. 4). Over half of all IFLs are estimated to experience significant under-the-canopy biodiversity degradation (ref. 5). In contrast, FSC-certified concessions have been shown to maintain intact populations of vulnerable wildlife species (ref. 6).

This motion is not about compromising environmental and social values: It is about achieving their conservation more effectively. **By emphasizing ecological integrity, gaining stronger local support and applying best practices for ecological resilience together with consistent, rigorous, context-specific management- and monitoring systems**, FSC can enhance impactful management of IFLs instead of becoming marginalized in the very regions where its presence is most urgently needed. **Best practices** for maintaining ecosystem integrity may, for example, involve retaining sufficient areas and distributions of old-growth stands in boreal forests to support the recovery of old-growth-associated species, or ensuring adequate canopy cover in tropical forests to preserve habitats for interior forest species.

#### Additional arguments and information:

##### 1. Improve Conservation Outcomes:

- The current requirements for IFLs are purely remote-sensing based, while ignoring ecosystem integrity and historical anthropogenic activity. The current rules have failed to prevent further degradation and discourage widespread certification. Certifying more IFLs with strict requirements aimed at preserving ecosystem integrity ensures better management and real impacts (ref. 6 & 7).
- Resources spent on managing IFL complexities can be better allocated to other FSC conservation priorities.

##### 2. Expand FSC's Presence in IFLs:

- Prioritizing ecological outcomes and streamlining the certification process with economically viable requirements will position FSC as the preferred system for highly biodiverse IFLs that require effective management.
- Key regions affected include the Amazon, Congo Basin, Canada, Scandinavia, and Southeast Asia.

##### 3. Strengthen FSC's Global Reach and Competitiveness

- Improving IFL requirements and reducing uncertainty will make FSC more attractive compared to competing certification schemes like PEFC, supporting its global goal of expanding certification in natural tropical and boreal forests.

## Counterarguments & Responses

- **Claim:** FSC certification in IFLs promotes logging and degradation while they should be protected.  
**Response:** What will happen to IFLs if FSC retains little to no influence in global IFLs? It is much more likely that without FSC, logging occurs under weaker standards, than that IFLs will be protected. FSC ensures best practices, requiring companies to monitor and mitigate biodiversity impacts.
- **Claim:** IFLs will not be strictly protected by FSC, thereby risking their ecological integrity.  
**Response:** Only 0.6% of IFLs are currently FSC-certified, and current requirements may push these areas out of the system. Expanded certification ensures improved management and impactful conservation outcomes across a larger area.
- **Claim:** The threshold approach is essential for IFL conservation.  
**Response:** Thresholds are an oversimplified solution that fails to account for ecological and social contexts. Locally tailored, adaptive management and landscape specific measures are more effective in preserving IFL integrity.
- **Claim:** Biodiversity credits can compensate logging companies for halting logging.  
**Response:** Biodiversity credits are not scalable for global IFL conservation. FSC certification provides a proven, sustainable framework benefiting both biodiversity and people (ref. 6 & 7).

## References:

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[45-2025\\_Final\\_feasibility-assessment\\_ENG.pdf](#)

[45-2025\\_Final\\_Feasibility\\_Assessment\\_SPA.pdf](#)

[45-2025\\_Final Feasibility Assessment\\_FRA.pdf](#)

[Zwerts et al., 2024b, Forests and Global Change.pdf](#)

[45-2025\\_Impactful\\_IFL\\_Conservation\\_VI\\_20250313124324.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**45/2025**

**Moving beyond fixed thresholds to outcome-based conservation for intact forest landscapes (IFLs)**

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

**1 ENVISAGED OUTCOME AND DELIVERABLES**

**1.1 Stated or Assumed Outcome**

- A revised approach for the management and protection of IFLs replacing fixed protection thresholds with rigorously designed impact-oriented ecological integrity indicators, accompanied by a robust FPIC procedure to ensure direct engagement and recognition of indigenous peoples and local communities as IFLs and/or Indigenous Cultural Landscapes rightsholders and strengthened context-specific HCV assessments for IFL is offered by FSC.

**1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- A robust and scientifically grounded methodology for monitoring ecological integrity indicators within IFL, with clearly defined timelines for implementation, reporting, and continuous improvement included in requirements and guidance.
- A standardized methodology to establish IFL baselines, subject to verification by independent third parties for consistency, quality and transparency across different forest contexts.
- A risk assessment methodology to monitor logging or other product extraction operations in IFL areas, complemented by a mechanism for FSC Regional and/or National entities to integrate stakeholder feedback and adapt forest management practices based on social and ecological changes.
- A context-specific FPIC procedure that prioritizes the enhancement of Indigenous and local community values, including recognition of traditional land use, cultural heritage, and historic settlement affected by IFL demarcation.
- Development of regionally tailored publicly supported landscape-level High Conservation Value (HCV2) assessments and management tools for critical ecosystems or jurisdictions. These tools should include practical, standardized approaches to guide planning, monitoring, and reporting requirements in IFL management.

**2 FSC GLOBAL STRATEGY 2021-2026**

**2.1 Link to Global Strategy**

- Not provided

## 2.2 Contribution to Global Strategy

- Contributions can be claimed towards Goal 1.4 Expand the reach of FSC and its relevance in the fight against climate change and loss of biodiversity and Goal 2.4 Scale up benefits for Indigenous Peoples, communities, smallholders and workers.

## 3 CLARITY & SPECIFICITY OF THE MOTION

- The motion is clear in its objectives, such as replacing the current threshold protection level approach for IFLs with an integrated risk-based criteria, monitoring science-based indicators for ecological functionality of forests, and a strong component of protection of local rights and FPIC.
- The motion explicitly builds upon the outcomes of Motion 23/2022, aiming to institutionalize its learnings, such as the monitoring of ecological integrity indicators and the integration of socio-ecological data. It also expands on these foundations by calling for FSC-endorsed, context-specific HCV assessments and landscape-level planning tools to support IFL management.
- While some concrete solutions for the motion's implementation are proposed, the motion could have some significant political or strategic implications that are not necessarily made explicit. On this, see the comments made in Expected Impacts section and the relation to other motions.
- Specifically, it is not clear whether the concept of IFL baselines refers to present IFL extend or to present values of ecological integrity and socio-environmental aspects within IFL.

## 4 FEASIBILITY OF IMPLEMENTATION

### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☒ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### **4.4 (Pre)conditions for implementation**

- Dedicated project team, including a (technical) working group to develop the requirements, with expertise on standard development, multi-stakeholders' processes, forest management certification and impact verification.
- Exploration of alternative solutions for the monitoring of socio-environmental values and assessment of the potential burden associated it and its associated risks for FSC certification
- Assessment and decision of the right spatial scale at which the different elements proposed (ecosystem integrity indicators, risk, baselines etc.) should be specified (IFL vs country vs regional level) and the normative ways to integrate requirements
- Perhaps additional resources for monitoring and evaluation will be needed, depending on specific regions.
- Additional expertise and resources may be needed for the monitoring of ecological integrity indicators and to link social and ecological changes to forest management.
- Additionally, expertise and resources may be needed for the landscape level HCV assessment, for integrating ecological and social data.

### **5 BENEFITS / IMPACT**

#### **5.1 Expected impacts of the motion**

- As the motion implies a management of IFLs more focused on the maintenance and/or restoration of sustainability values, a likely impact could be that FSC certification through the development of forestry activities in IFL is associated with less protection (smaller threshold) and subsequent loss of IFL as per their original definition. In other words, the motion does not call for an increased IFL protection as written but for an increase protection of forest values to be found in IFL. While the benefits of FSC for the maintenance of such forest values could be brought forward, there is a risk that FSC is criticized as causing the loss of IFL globally. While the approach aims to be adaptive and locally relevant, it may also introduce increased technical and financial burdens for implementation. These challenges may affect forest managers, potentially impacting the accessibility and viability of FSC certification in IFL regions without clear gains in conservation outcomes, at least in the first phase.

#### **5.2 Synergies with work underway:**

- The motion builds upon the learnings from Motion 23/2020 IFL landscape pilots, which are generating practical experiences with context-based conservation, ecological functionality assessments, and stakeholder engagement. These pilots provide foundational methodologies and lessons that can directly inform the implementation of this motion.
- The motion could also be considered under the on-going development of outcome orientation and especially under the up-coming requirements in FSC-PRO-60-006a to make Forest Stewardship Standards having a set of prioritized key intended outcomes and associated monitoring activities to quantify progress.
- The motion may also contribute to the ongoing revision of the FSC Principles and Criteria, by introducing more dynamic, value-based approaches to forest conservation and management, especially under Principle 6 (Environmental Values and Impacts). This could inform future iterations of the P&C with updated perspectives on intactness, resilience, and adaptive management.
- Finally, the motion aligns with FSC's work on ecosystem services, especially initiatives exploring the quantification and validation of conservation and restoration outcomes in

certified forests, by embedding ecological functionality and socio-environmental value assessments into IFL-related management frameworks.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- The motion is partially linked to Motion 48/2025 which requests for a strategic and operational framework that provides a vision for the protection of HCVs, including IFLs. The high-level requests of motion 45/2025 regarding maintaining and restoring environmental and socio-cultural values in IFLs can inform and contribute to a landscape level (beyond management unit) vision for IFLs called for by Motion 48/2025.
- The motion is also linked to Motion 43/2025: Strengthening identification, protection and monitoring of forest HCVs (1-6) as the latter calls for improved monitoring for systematic and regular reviews for strengthened protection of HCVs, including HCV2, that accounts for IFLs.

### 6.2 Alternative 1

#### 6.2.1 Status

- ☒ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.2.2 Description

- The board has requested to broaden the conversation on the role of FSC in the definition, management and protection of IFLs. To support the request, the Secretariat commissioned the development of a discussion paper on IFLs. It is likely that based on the discussions towards and during the GA, the views of members collected for the discussion paper, preliminary results from Motion23/202 pilots and other relevant inputs, the Board takes a decision that involves a revised strategic/policy approach towards IFLs from 2026 onwards.

### 6.3 Alternative 2

#### 6.3.1 Status:

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☐ Already started
- ☐ Already exists

#### 6.3.2 Description

- <Assessment in form of a short description of the work>

## 7 IN A NUTSHELL

- This motion proposes an evidence-based approach for protecting IFL. It aims to strengthen conservation outcomes, balancing biodiversity protection, cultural value preservation, and sustainable resource use. It secures FSC's relevance in tropical and boreal forests. enhancing consultation and collaboration with Indigenous and local communities, establishing an adaptive management approach and enhancing protection of ecological integrity while addressing social contexts.

## **7.1 Key open questions**

- How will monitoring responsibilities be distributed?
- Will all IFL areas, regardless of region, forest manager size, or tenure system, be subject to mandatory ecological integrity monitoring?
- Will all certificate holders with conservation values (including MU overlap with IFL) be expected to monitor impacts?
- What would be the approach taken in countries that are currently undergoing revision of their protection thresholds as part of the Motion 23/2020 pilots?

## 46/2025 FSC SHALL CERTIFY RESTORATION

Edited | Policy Motion

|                                  | Proposed By           | Seconded By           | Seconded By                |
|----------------------------------|-----------------------|-----------------------|----------------------------|
| <b>Name</b>                      | Richard Donovan       | Daniel Hall           | Rulita Wijyaningdyah       |
| <b>Organization / Individual</b> | Donovan, Richard, Mr. | Hall, Daniel A., Mr.  | Wijyaningdyah, Rulita, Ms. |
| <b>Chamber / Subchamber</b>      | Economic / North      | Environmental / North | Social / South             |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025. The motion was amended on 19 September, 2025. You will find the original motion at the bottom of this page, in the background documents.**

FSC shall explicitly develop and offer “FSC Restoration Certification” as a highly visible product and service.

**Option A** – The least expensive and most timely option identified would be to do 2 things at the same time. First, FSC should improve communications and marketing around the FSC Verified Impacts approach using restoration as a major Verified Impacts option. Second, FSC should explicitly accept a subset of the Preferred by Nature (PbN) indicators as an approved standard (or “restoration module”) for adding restoration to full FM under the Verified Impacts approach (i.e., FSC restoration certification would require meeting the applicable FM standard AND restoration module requirements). The “FSC restoration module” would include only the indicators in the PbN standard that are specific to restoration and not include indicators that are already covered by the FSC FM standards already. The restoration module would be reviewed by FSC and adopted as an interim 5-year solution allowing FSC to get fully engaged in restoration whilst other processes are occurring and evolve (e.g. revision of the P&C and IGLs – see Option B as an illustrative option below).

**Option B** – Incorporate restoration as a clear priority for upcoming P&C and IGL revisions, integrating restoration elements into both, capitalized on work already done by PbN, the Society for Ecological Restoration (SER), or others. This option will take the longest.

Option A is the preferred option - Options B is provided as illustration of a longer term option related to P, C & I processes already started by FSC.

Overall this motion asks FSC to engage publicly on restoration by doing what FSC can do well – providing a robust mechanism for certifying high quality forest management with restoration that is consistent with FSC values.

### **Background Information and Key Documents:**

**Urgency** - We are now well into the publicly declared United Nations “Restoration Decade” (2021-2030) and the Bonn Challenge. At the Biodiversity COP 15 nearly 200 governments signed onto the Global Biodiversity Framework by which governments commit to restoring 30% of degraded land by 2030 (Target 2) and protecting 30% of land, waters and seas by 2030 (Target 3) and we now have the European Commission’s 2024 Nature Restoration Law.

**Links to Current FSC and Other Related Efforts** - FSC has already developed a Remedy Framework that has a major element of restoration and is currently being rolled out. Restoration is also already included as an activity which can deliver FSC Verified Impacts (formerly Ecosystem Services), but there is no approved stand-alone restoration standard or module as part of it. Verified Impact certified efforts aren’t as visible as they should be. Most people and organizations in the restoration sector are not even aware of an FSC offering a form of restoration certification. Restoration activities may include rehabilitation, reforestation, or afforestation done in line with FSC values, e.g., no conversion, no destruction of natural ecosystems or High Conservation Values (HCVs), strong community support and where applicable FPIC, etc.. It can be frustrating for Forest Management (FM) certificate holders (CHs) who are carrying out this restoration work without being able to clearly and publicly claim benefits, either financial or reputational, or demonstrate progress to stakeholders, investors or governments on restoration efforts. The FSC Remedy Framework could benefit from clearer restoration requirements, ensuring companies responding to remedy are doing so in a credible and technically sound way, and that related public claims are accurate. Unfortunately, the restoration toolbox wherein FSC was expected to deliver a “verification tool” for potential FSC use is on hold pending the development of the *Climate Biodiversity Restoration Strategic Framework (currently under consultation)*.

On a separate track, after 5 years of using the PbN standard for "verification", PbN is now seeking stakeholder comments to revise and improve their overall restoration verification standard, which was originally designed to align first and foremost with FSC values. PbN is also developing a restoration module (a "work in progress") that could be added to FSC FM using the Verified Impact approach and used in combination with other elements of the FSC Remedy Approach. The module could be used by

any certification body.

**Benefits for FSC Certificate Holders, Economic Actors & the FSC System** – Some current FM CHs are implementing restoration, including those engaged in Verified Impacts, often doing so without much public recognition. Also, a stronger effort could benefit both new and existing FM CHs by offering FSC-certified restoration in a simpler way that may better attract financing or other kinds of support (in tandem with or as a complement to the Verified Impacts model). Finally, existing CHs could find that explicit FSC auditing and credible certification of restoration with FSC values ensures an equal playing field for all CHs (existing or new) in the FSC system.

**Options for FSC Restoration Certification** - As proposed, the FSC restoration certification approach would build on the existing restoration standards and verification experience developed by Preferred by Nature (PbN), but also other experience at FAO, the IUCN *Standards of Practice to Guide Ecosystem Restoration*, 2024, SER's *International principles and standards v2*, 2019, and the related Mirlo Reports recommendations done for FSC in 2022. It is NOT intended to in any way undermine or complicate existing FSC FM certification processes, but to foster more action on restoration – a global FSC priority - using a modular approach building on Verified Impacts. - We are now well into the publicly declared United Nations “Restoration Decade” (2021-2030) and the Bonn Challenge. At the Biodiversity COP 15 nearly 200 governments signed onto the Global Biodiversity Framework by which governments commit to restoring 30% of degraded land by 2030 (Target 2) and protecting 30% of land, waters and seas by 2030 (Target 3) and we now have the European Commission's 2024 Nature Restoration Law. FSC itself has developed a Remedy Framework that has a major element of restoration and is currently being rolled out. Restoration is already included as an activity which can deliver FSC Verified Impacts (formerly Ecosystem Services). However, there are issues. For example, though Verified Impact certified operations include restoration, their efforts aren't as visible as they should be. Most people and organizations in the restoration sector are not even aware of an FSC offering restoration certification. Second, though FSC Remedy Framework includes a restoration option/component, it could benefit from clearer restoration requirements, ensuring companies responding to remedy are doing so in a credible and technically sound way, and that related public claims are accurate. Unfortunately, the restoration toolbox wherein FSC was expected to deliver a “verification tool” for potential FSC use is on hold pending the development of the *Climate Biodiversity Restoration Strategic Framework (currently under consultation)*.

[46-2025\\_FSC\\_Shall\\_Certify\\_Restoration\\_20250313124233.pdf](#)

[46-2025-Final\\_feasibility\\_assessment\\_ENG.pdf](#)

[46-2025-Final\\_feasibility\\_assessment\\_FRA.pdf](#)

[46-2025-Final\\_feasibility\\_assessment\\_SPA.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**46/2025** FSC shall certify restoration

Accepted by the Motions Committee as:

- ☐ Statutory motion
- ☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- FSC offers a dedicated certification solution for restoration and has stronger visibility and engagement in the restoration sector.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- Certification solution for restoration and related supporting activities for market visibility. In particular, to pursue one of the following sets of deliverables:

#### **Option A:**

- Marketing and communication initiatives of FSC Verified Impacts approach in restoration contexts.
- A gap analysis between the Preferred by Nature (PbN) 'indicators' and FSC forest management standards
- An FSC restoration module including the resulting indicators as an interim 5-year solution while the revision of the FSC Principles and Criteria and International Generic Indicators is completed.

#### **Option B:**

- Revised FSC Principles and Criteria and International Generic Indicators, that explicitly integrate restoration objectives, considering existing work from PbN, Society for Ecological Restoration, and others.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- Not provided.

### **2.2 Contribution to Global Strategy**

- Forest restoration contributes to mitigating climate change and biodiversity loss by enhancing carbon sequestration, improving ecosystem resilience, and supporting diverse species.

This motion contributes to Goal 1.4 Expand the reach of FSC and its relevance in the fight against climate change and loss of biodiversity, in particular to the intended outcome related to contributions to the development of widely used norms for forest landscape restoration.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion is generally understandable. However, the expected result of Option 1 with reference to 'adding restoration to full FM under the Verified Impacts approach (i.e., FSC restoration certification would require meeting the applicable FM standard AND restoration module requirements)' is not fully clear, as it isn't whether any type of claim is anticipated from its implementation.

- Moreover, the motion provides two options regarding its implementation and deliverables resulting in different timelines for its completion.

## 4 FEASIBILITY OF IMPLEMENTATION

### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☒ 250.000 to 500.000 EUR (Option A)
- ☒ More than 500.000 EUR (Option B)

### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☒ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

### 4.4 (Pre)conditions for implementation

- Dedicated project team and working group to develop the requirements, with expertise on policy development, restoration, forest management certification and impact verification, specialized marketing and communication staff and management oversight.
- Third-party standards may be subject to copyright, and their use may require consent and, in some cases the payment of a license fee. Therefore, Option A requires legal review before implementation and, if necessary, negotiations with the standard owner.

## 5 BENEFITS / IMPACT

### 5.1 Expected impacts of the motion

- There are benefits for FSC in offering a new solution that contributes to both climate and biodiversity outcomes, while aligning closely with FSC's core work (development of standards for responsible forest management). This initiative can help attract new stakeholders to the FSC system, strengthen FSC's value proposition, and provide a mechanism for forest managers to make credible claims on restoration and potentially access new sources of revenue. However, to leverage these opportunities at scale, dedicated investments would need to be made increasing the Secretariat's capacity for the motion's successful implementation.

## 5.2 Synergies with work underway:

- Revision of the FSC Principles and Criteria and International Generic Indicators, exploring how to make FM normative framework more fit for purpose to meet today's multiple challenges, e.g. for restoration objectives.
- Development of the FSC Climate and Biodiversity Strategic Framework aiming to clarify FSC's role in tackling climate and biodiversity related challenges and serve as guide for new development and implementation of climate, biodiversity and restoration (CBR) solutions to position FSC as leader in the field.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- No connections identified. The final objective of mitigating climate change and biodiversity loss is similar to Motion 47 (Promote FSC certification and ecosystem services verification as relevant climate change investment tools by widening the landscape approach to encompass diverse woodland ecosystems).

### 6.2 Alternative 1. Revision of the FSC Principles and Criteria and International Generic Indicators

#### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

#### 6.2.2 Description

- While this process could provide a certification pathway tailored to restoration, such as a specific subset of criteria and additional indicators suited for restoration scenarios, it has a broader scope than restoration and may take more time to be completed.

## 7 IN A NUTSHELL

- This motion is requesting FSC to develop a voluntary module for certification of restoration, by adopting PbN indicators (option A) or incorporating restoration as a clear scenario in the revision of the FSC Principles and Criteria and the International Generic Indicators (option B). This initiative supports FSC's Global Strategy, particularly Goal 1.4. Implementation is expected to take between 1 and 3 years, with costs between 250.000 to 500.000 EUR or exceeding 500,000 EUR, depending on the option pursued. Restoration certification offers climate and biodiversity benefits, strengthens FSC core mission, and can attract new stakeholders and revenue opportunities. Success depends on securing dedicated resources, including a project team with expertise in policy development, restoration, and forest management certification, and on the effective of promotion and marketing of such a new certification solution.

### 7.1 Key open questions

- How is Option 1 expected to be used in relation to the Verified Impacts approach? Would a restoration project have to be assessed against the applicable Forest Stewardship standard, the restoration module AND the Ecosystem Services Procedure? Further clarity would be helpful.

- What types of claims are certificate holders expected to be able to make using this module?
- How is this module expected to be used in connection with the FSC Remedy Framework, mentioned in the 'Background' section?
- Are the PbN indicators those in the Ecosystem Restoration Standard? Or does Option A refer to the restoration module (a "work in progress") mentioned in the background?

47/2025

## PROMOTE FSC CERTIFICATION AND ECOSYSTEM SERVICES VERIFICATION AS RELEVANT CLIMATE CHANGE INVESTMENT TOOLS BY WIDENING THE LANDSCAPE APPROACH TO ENCOMPASS DIVERSE WOODLAND ECOSYSTEMS.

Edited | Policy Motion

|                                  | Proposed By      | Seconded By      | Seconded By                        |
|----------------------------------|------------------|------------------|------------------------------------|
| <b>Name</b>                      | Alan Smith       | Mike Bekin       | Thankappannair Rajalayam Manoharan |
| <b>Organization / Individual</b> | Smith, Alan, Dr. | Bekin, Mike, Mr  | Manoharan, TR, Dr                  |
| <b>Chamber / Subchamber</b>      | Social / North   | Economic / North | Environmental / South              |

### Policy Motion (Motion text / High-level action request):

**Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025.**

The motion requests FSC to implement the Global Strategy objective to “Grow Our Reach” by extending the scope to all biodiverse forest landscapes. The draft Climate and Biodiversity Strategic Framework underlines that “FSC is broader than a timber certification scheme”. Unless FSC takes advantage of this and addresses the climate crisis across the broad spectrum of woodlands, its role as a relevant climate change tool will not be credible. The suggested pathway is to make FM certification and ecosystem services claims more accessible for a wider range of forests managers in wooded areas not primarily used for timber harvesting. While these woodlands are covered in Standard FSC-STD-01-001 (P&C), they are marginalised within the system even though they provide important ecosystem services (ESS). As a result FSC is clearly missing out on market opportunities. To facilitate this, especially for smallholders and indigenous communities, a move towards fast tracking ecosystem services verification is needed, using a SLIMFs approach or else a separate targetted conservation procedure, in line with Strategy Goal 1.2, to simplify access to the verification procedure. The actions requested are:

(1) to re-establish a professionally experienced climate team with a mandate to extend the FSC system to all wooded landscapes to achieve climate change goals;

(2) to upgrade FSC's communication, marketing and advocacy proficiencies with a clear market strategy to promote FSC as an effective and inclusive climate change platform, aligning it with global concerns and additionally attract international donor investment;

(3) to create an easily understandable toolkit to demonstrate how ecosystem services verification and validation (Verified Impact) can be used according to the different categories of woodland and to follow a simplified SLIMFs FM process or a streamlined conservation procedure (with a reduced number of ESS relevant indicators) which would overcome the present cost barrier of requiring full compliance with FMU requirements;

(4) to seek partners in the private and public sectors to co-develop projects for funding in selected high impact pilot areas, using external contacts and the FSC Network to identify potential sources of finance. The pilot projects would focus on distinct ecosystem services related to climate change and learn from previous lost opportunities (see the Key Documents list for information) and test the proposed procedures including those separating ecosystem services verification from FM certification;

The timelines for these activities will vary according to their feasibility of implementation with actions (1) to (3) being the most straightforward.

### **Background Information and Key Documents:**

The FAO defines land with tree crown cover of more than 10% as forest, moreover the P & C "*are applicable to all types and scales of forest*". Even so, many wooded areas are frequently not considered viable for FSC certification as the predominant land use is not necessarily for timber. Given their environmental and social values, there are considerable opportunities to promote FSC certification and to generate climate-oriented finance by bringing them into the system. Paradoxically as the draft Climate and Biodiversity Strategy points out, buyer awareness in emerging markets is low, including in regions particularly subject to climate change threats and where international donor funding is often targetted. The opportunities are there. The successful UN Environment/GEF supported project "*Expanding FSC certification at Landscape Level through Incorporating Additional Ecosystem Services*" is one such example of FSC raising both private and public sector finance. However the current FSC ecosystem services verification approach is too complex and costly for many stakeholders to access and is focussed on FMUs for logging operations.

The landscapes include dry forests, HCV areas, well-wooded savannas, mangroves, watersheds, wetlands and urban forests. The research data show that all have important climate change mitigation and adaptation functions. Furthermore, many are under threat and are inadequately managed, or not

managed at all. For instance, the mangroves of Central America are vanishing because of climate change and the absence of conservation measures. The consequences of poor management are various: depletion of water sources, contamination of wetlands, soil erosion/landslides in watersheds, environmental heightened fire risk, loss of wildlife habitat. Not least are the risks inherent to the livelihoods of indigenous peoples yet indigenous peoples' management of forests is a proven way of mitigating climate change, see [www.recoftc.org/stories/reaching-our-roots-traditional-ecological-knowledge-ratchet-climate-action](http://www.recoftc.org/stories/reaching-our-roots-traditional-ecological-knowledge-ratchet-climate-action).

Geographic examples of biodiverse landscapes are the Chaco dry forests in Argentina, Bolivia and Paraguay. Brazil has dry forests in Mato Grosso, Caatinga and the Atlantic region. In Africa, Zambia has the dry miombo woodlands, important for community livelihoods. In Asia, there are dryland forests in South Sulawesi, Indonesia. Savannas also provide vital services including for climate change mitigation. The Serengeti-Mara ecosystem stretching across sub-Saharan Africa is considered the most extensive but there are major savannas with significant tree cover elsewhere including in Brazil (Cerrado), the Llanos de Moxos in Bolivia and the Llanos in northern South America. In respect of climate mitigation, recent research in Nigeria has shown that the small and medium diameter trees provide important carbon pools ([www.academia.edu/2997-6006/2/1/10.20935/AcadEnvSci7473](http://www.academia.edu/2997-6006/2/1/10.20935/AcadEnvSci7473)). Associated savanna soil systems also store significant amounts of carbon.

Mangroves are found across continents including in Panama which has the most diverse mangrove system in the Americas. There are also substantial mangroves in Brazil and Mexico. In Asia, there are prolific mangroves in India and Bangladesh (Sundarban mangrove forest). Elsewhere, Indonesia and the Mekong Delta in Vietnam have major mangroves. West Africa is the principal location for mangroves on this continent which are also havens for wildlife. Madagascar is another significant area for mangroves but these have subject to considerable deforestation. As for wetlands, these include the Brazilian-Bolivian Pantanal wetland and the Everglades wetlands in Florida, USA. Watersheds are found across the Globe but one noteworthy is the Chao Phraya watershed in Thailand, vital for the country's agriculture sector. Many of these areas, particularly mangroves and wetlands, are major carbon sinks as well as providing coastal protection and habitats for wildlife. Additionally a wide variety of NTFPs are commonly found in these diverse landscapes, many of which are critical for indigenous peoples' and community livelihoods. One region particularly important for NTFPs as well as climate mitigation is North Africa where the Cork Oak forests are not only major carbon sinks but are strongly resistant to forest fires, so protecting against soil erosion and desertification.

Urban forests too have a role to mitigate climate change, particularly for air quality and its effect on human health. However until now only a few European cities have been FSC certified, see <https://fsc.org/en/newscentre/stories/urban-forest-of-riga-now-certified>

In summary, the intent of the motion fits well with the FSC's 2026 Objective of "Growing Our Reach". It relates to Global Strategy Goal 1.4 "Expand the reach of FSC and its relevance in the fight against climate change and loss of biodiversity"; Goal 2.4 "Scale up benefits for Indigenous Peoples, communities, smallholders and workers"; and Goal 3.1 "Advance the mission through stronger alliances, coalitions and partnerships". Certification of responsible management of such landscapes evidences their value to society as a whole, as aspired to in Strategy Goal 3.4 "Accelerate awareness of the value of forests". At the same time, it enhances FSC's capacity to mitigate environmental challenges and protect community livelihoods, dependent on maintaining the ecosystems. All-in-all, FSC cannot afford to continue to overlook the diversity of forest landscapes if it is to present itself as a realistic tool to address climate change challenges.

## Feasibility Assessment for this motion:

[Download here.](#)

[FAO definition of woodlands as forests.pdf](#)

[Dry forests and climate change CIFOR article.pdf](#)

[Wetlands & Climate Change.pdf](#)

[carbon-sequestration-in-mangroves.pdf](#)

[Cashew expansion holds potential for carbon stocks in Ghana savanna.pdf](#)

[Payments for Ecosystem Services.pdf](#)

[Climate change and urban forests fact sheet.pdf](#)

[Indigenous knowledge is crucial in the fight against climate change.pdf](#)

[Costa Rica's payment for ecosystem services programme.pdf](#)

[47-](#)

[2025\\_Promote\\_FSC\\_certification\\_and\\_ecosystem\\_services\\_verification\\_as\\_relevant\\_climate\\_change\\_investment\\_20250313.pdf](#)

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

47/2025

**Promote FSC certification and ecosystem services verification as relevant climate change investment tools by widening the landscape approach to encompass diverse woodland ecosystems**

Accepted by the Motions Committee as:

- ☐ Statutory motion  
☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- Expand FSC's reach and demonstrate its value in addressing climate change and biodiversity loss by making forest management certification and ecosystem services claims more accessible, recognizing and including 'diverse woodlands' beyond those for timber production, and attracting donor investment to strengthen incentives for conservation.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- Establishment of a climate change team.
- Communication and marketing materials and advocacy efforts promoting FSC as an effective and inclusive climate change solution..
- A simplified solution for Small and Low-Intensity Managed Forests (SLIMFs), in particular for management units with conservation objectives, to facilitate access to forest management certification and FSC Verified Impact.
- Guidance on how ecosystem services verification and validation can be applied to the different categories of woodlands.
- Partnerships established with private and public sector for project co-development and funding to conduct pilots.
- Identification of sources of finance and mobilization of finance.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- 2026 objective: Growing our reach.
- Goal 1.2. Streamline policies and standards towards outcome orientation
- Goal 1.4 Expand the reach of FSC and its relevance in the fight against climate change and loss of biodiversity.
- Goal 2.4 Scale up benefits for Indigenous Peoples, communities, smallholders and workers.
- Goal 3.1 Advance the mission through stronger alliances, coalitions and partnerships.
- Goal 3.4 Accelerate awareness of the value of forests.

### **2.2 Contribution to Global Strategy**

The motion can contribute to:

- Goal 1.2 and 2.4 providing streamlined access to forest management certification and the use of the Ecosystem Services Procedure, especially for smallholders and indigenous communities,
- Goals 1.4 and 3.4 as woodlands play a key role in the fight against climate change and biodiversity loss, and wetlands, peatlands or mangroves are major sinks of carbon and home to endemic species, and to
- Goal 3.1 by the establishment of new partnerships.

### 3 CLARITY & SPECIFICITY OF THE MOTION

- The outcome of the motion is generally understandable. However, the mandates related to partnerships and funding lack the specificity needed for unambiguous implementation and clarity regarding the expected results required to consider the motion implementation as successful.

### 4 FEASIBILITY OF IMPLEMENTATION

#### 4.1 Estimated time needed from implementation start until closure of the motion:

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☐ 1 – 3 years
- ☒ More than 3 years

#### 4.2 Estimated one-time costs:

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☒ More than 500.000 EUR

#### 4.3 Estimated ongoing costs (per year):

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☐ 100.000 to 250.000 EUR
- ☒ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### 4.4 (Pre)conditions for implementation

- The implementation of this motion requires the establishment of a multidisciplinary climate team with a broader scope of work and strengthening the collaboration across teams.

### 5 BENEFITS / IMPACT

#### 5.1 Expected impacts of the motion

There are benefits for FSC in promoting forest management certification and verified impacts of woodlands and savannas and 'other vegetation types' (term used in FSC Principles and Criteria), such as wetlands, peatlands or mangroves, and demonstrating their value and FSC

relevance as a solution for climate change and biodiversity loss. It can help to increase FSC certified area, attract new stakeholders and funding to the FSC system and strengthen FSC's value proposition, although these ecosystems may represent a niche area compared to other forest types. Establishing a multidisciplinary climate team dedicated to this area presents an opportunity to foster cross-unit collaboration

## 5.2 Synergies with work underway:

- Revision of the FSC Principles and Criteria and International Generic Indicators, exploring how to make FSC certification more fit for purpose.
- Development of the FSC Climate and Biodiversity Strategic Framework aiming to clarify FSC's role in tackling climate and biodiversity related challenges and serve as guide for new development and implementation of CBR solutions to position FSC as leader in the field.

## 6 ALTERNATIVES

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### 6.1 Connections to other motions:

- No connections identified. The final objective of mitigating climate change and biodiversity loss is similar to Motion 46 (FSC shall certify restoration)

### 6.2 Alternative 1: Wait for conclusion of revision of the FSC Principles and Criteria and International Generic Indicators and development of the FSC Climate and Biodiversity Strategic Framework

#### 6.2.1 Status

- ☐ For potential consideration
- ☐ Planned / in preparation
- ☒ Already started
- ☐ Already exists

#### 6.2.2 Description

- See synergies section above. These processes are considering the aspects required by the motion from a holistic perspective.

## 7 IN A NUTSHELL

- The motion aims to expand FSC's reach and demonstrate its value in addressing climate change and biodiversity loss by making forest management certification and ecosystem services claims more accessible, in particular for smallholders and management units with conservation objectives, to better enable certification 'diverse woodlands' beyond those for timber production, and attracting donor investment to strengthen incentives for conservation. The deliverables include the establishment of a climate change team, communication and marketing materials, advocacy efforts, a simplified standard for SLIMFs and management units with conservation objectives, guidance, partnerships for pilot projects and mobilization of funding. The motion is aligned with FSC Global Strategy and has a timeline of 1-3 years, with costs beyond €500,000. It can attract new stakeholders, funding, increase FSC certified area and promote internal collaboration, although it may also remain a niche focus compared to other forest types.

## 7.1 Key open questions

- The motion refers to FAO definition of forests. However, FSC has its own definition of forest. FSC definition of 'other vegetation types' includes wetlands such as mangroves or peatlands, while woodlands and savannas can be considered 'forests' by FSC. While the intention of the motion seems clear, aligning it or explaining how the terms relate to FSC terms may be helpful.
- Management units with conservation objectives qualify as 'Small and Low-Intensity Managed Forests'. FSC has already different policy solutions to facilitate access to forest management certification for this scenario (e.g. Continuous Improvement Procedure or indicators for SLIMF operations in Forest Stewardship Standards) and is exploring further streamlining in the PCI revision. More clarity on the expectations of the motion proposers would be helpful.

48/2025

## A Strategic Framework for Forest Landscape-Level Engagement and Impact

Merged | Policy Motion

|                                  | Proposed by      | Seconded by      | Seconded By                           |
|----------------------------------|------------------|------------------|---------------------------------------|
| <b>Name</b>                      | Caroline Duhesme | Alan Smith       | Thankappannair<br>Rajalayam Manoharan |
| <b>Organization / Individual</b> | ATIBT - Congo    | Smith, Alan, Dr. | Manoharan, TR, Dr                     |
| <b>Chamber / Subchamber</b>      | Economic / South | Social / North   | Environmental / South                 |

### Policy Motion (Motion text / High-level action request):

*Note from the Secretariat: This motion was accepted by the Motions Committee after the deadline for amendments on 19 September 2025. The motion was merged with motion 44 on 19 September, 2025.*

✦ The General Assembly requests FSC to develop a **strategic and operational framework** for engagement and impact **at the forest landscape level**, complementary to but independent from the FMU approach.

✓ This framework shall:

- 🌱 Provide a **strategic vision** for FSC's role at the landscape level, recognizing that forest resilience, biodiversity conservation, climate action, and the protection of HCVs (including IFLs) require coordinated approaches beyond FMUs.
- **Be voluntary**, creating no new obligations for FMU certificate holders, and independent from the FMU approach.
- Be made available to stakeholders as an **optional module**, inspired by FSC's Ecosystem Services Procedure (FSC-PRO-30-006) in spirit and positioning.
- 💰 Ensure that **additional costs are covered by external financing** (donors, development banks, climate funds, etc.), not by FMUs or FSC members.
- 🔗 Remain **complementary** to, and **independent** from, the **FMU approach**.

💡 This framework should:

- 👥 Involve **governments, Indigenous Peoples, local communities, landowners, forest managers, companies and civil society** in shared governance structures to define and implement land-use priorities
- 🔧 Be implemented progressively through **pilot projects**, generating lessons, tools and financing models before wider rollout.
- 📋 Allow for different forms of **recognition or assurance** (verification, project recognition, procedures, or optional landscape certification), depending on feasibility and demand
- 📄 Recognition **pathways** (such as certification, verification or monitoring) will be determined based on pilot results, feasibility, costs, and funder's requirements.
- 🌐 Mobilize and connect to **ecosystem services markets** (carbon, water, biodiversity, restoration) to help create a credible business case.
- 👤 Deliver **social and economic benefits**, by supporting smallholders, Indigenous Peoples, and marginalized communities, and by promoting opportunities such as ecotourism, non-timber forest products, and access to finance for ecosystem services.
- 📖 Integrate **knowledge and lessons learned**, drawing on HCV and IFL conservation, forest restoration, science, and past member proposals to expand FSC's impact beyond FMUs.
- 🚀 Contribute to **FSC's global strategy**, especially "**Growing our Reach**", and support climate, biodiversity, and social equity objectives.
- ☂️ Act as an **umbrella framework**, supporting and complementing other motions (e.g. M45 on IFLs, M46 on restoration, M41 on contractors, and M47/54 on climate & ES).

🔧 The elaboration of this strategic framework shall follow a phased process that minimizes cost and risk for FSC:

1. 📄 Preparation of a **low-cost feasibility package**.
2. 🌐 Selection of a **small portfolio (3–5) of pilot landscapes** to test governance and financing models.
3. 🔍 **Independent evaluation** and lessons learned, before any decision on expansion.

## Background Information and Key Documents:

FSC has been highly effective in promoting responsible forest management at the **FMU level**, but many of today's

most urgent challenges — **climate change, biodiversity loss, deforestation, ecosystem fragmentation, and social inequality** — extend beyond the boundaries of single concessions. Addressing these systemic issues requires a **landscape-level approach** that engages multiple land uses, jurisdictions, and stakeholders.

This motion builds on lessons from previous debates on Intact Forest Landscapes (IFLs) and from ecosystem services procedures, recognizing that FMUs alone cannot ensure the protection of forest ecological integrity or deliver large-scale impacts. It proposes that FSC act as a **platform for collective action**, creating an enabling framework where governments, local and Indigenous communities, landowners, companies and NGOs collaborate on common goals.

The approach would be **voluntary and phased**: starting with **pilot landscapes** in regions where FSC is already strong (tropical concessions, restoration areas, mixed-use landscapes). These pilots will test governance models, financing mechanisms, and monitoring systems for outcomes on climate, biodiversity, HCVs (including IFLs), and community rights.

Importantly, this is **not a new mandatory certification system**. Instead, it is an **evolving framework**, offering recognition and assurance at the landscape level. Landscape certification could become an option in the future, but the initial focus is on **flexibility, innovation, and credibility** — ensuring that FSC remains relevant, attracts new constituencies and funding, and strengthens its global impact.

By enabling FSC to operate both at FMU and at landscape scale, this motion creates the conditions for FSC to act as a true leader in addressing the **global forest crisis**, while also supporting and complementing other motions (M45 on IFLs, M46 on restoration, M41 on contractors, and M47/54 on climate and ecosystem services).

The motion aligns with FSC Global Strategy 2021–2026 (Transforming Markets, Catalyzing Change; Goals 1.4 and 3.1).

48-2025\_Landscape\_Certification\_Framework\_for\_Integrated\_Ecosystem\_Management\_V1-1\_20250424053954.pdf

48-2025\_Final\_feasibility-assessment\_ENG.pdf

48-2025-Final\_Feasibility\_Assessment\_SPA.pdf

48-2025\_Final\_Feasibility\_Assessment\_FR.pdf

**Final motion feasibility assessment,  
conducted by the FSC Secretariat**

**48/2025** A Strategic Framework for Forest Landscape-Level Engagement and Impact.

Merged:

☐ Statutory motion

☒ Policy motion

## **1 ENVISAGED OUTCOME AND DELIVERABLES**

### **1.1 Stated or Assumed Outcome**

- A voluntary, strategic, operational and enabling framework for engagement and impact at the forest landscape level, complementary but independent from the forest management unit. The framework mobilizes sustainable finance for climate, biodiversity, protection of HCVs and community benefit in a modular scheme, inspired by FSC's Ecosystem Services Procedure (FSC-PRO-30-006) in spirit and positioning, offering different forms of recognition and assurance at the landscape level.

### **1.2 Stated or Assumed Deliverable(s) by which the Motion can be considered closed**

- FSC delivers a "Strategic vision for FSC's role at the landscape level", a "Vision Paper" or "Strategic Framework Document", outlining FSC's landscape-level engagement approach, with clear principles, governance model, and financing structure, thereby recognizing that forest resilience, biodiversity conservation and climate action, require coordinated approaches beyond FMUs.
- Design and development of an optional, voluntary Landscape Module for stakeholders, modeled and inspired by FSC's Ecosystem Services Procedure, ensuring that additional costs are covered by external financing.
- The framework is participative and inclusive, involving governments, Indigenous Peoples, local communities, landowners, forest managers, companies and civil society in shared governance structures to define and implement land-use priorities.
- FSC designs a low-cost feasibility package and progressively implements 3-5 pilot projects for the landscape framework, with a focus on clear governance structures and accountability mechanisms; tests generated lessons, tools and financing models before wider rollout.
- From the pilot results and independent evaluation of policy lessons and decisions for further expansion or refinement, FSC landscape framework delivers different forms of recognition or assurance (verification, project recognition, procedures, or optional landscape certification), depending on feasibility and demand.
- FSC establishes a new continuous and more robust monitoring and evaluation framework to ensure that climate, biodiversity, and social and local community indicators are systematically tracked.

## **2 FSC GLOBAL STRATEGY 2021-2026**

### **2.1 Link to Global Strategy**

- This Motion explicitly references the overall objective "Growing Our Reach"; Strategy 2 Transform Markets and Strategy 3 Catalyze Change. As well as Goal 1.4 (expanding FSC's relevance in addressing climate change and biodiversity loss) and Goal 3.1

(emphasizes partnerships with governments, communities, and businesses to deliver measurable environmental, social, and economic benefits).

## **2.2 Contribution to Global Strategy**

- The motion contributions relate to Goal 1.4 Expand the reach of FSC and its relevance in the fight against climate change and loss of biodiversity by developing an FSC solution that is relevant for climate change and related global challenges in the landscape and contributes to increasing relevance by integrating cross-sectoral benefits to stakeholders in the landscape.
- Contributions can be considered towards Goal 2.4 Scale up benefits for Indigenous Peoples, communities, smallholders and workers since it requests for inclusion and equity across stakeholders such as providing targeted support to smallholders and indigenous communities to underline their importance in landscape management.
- Contributions can also be considered towards Goal 3.1 since it encourages regional collaboration among FSC-certified forest entities, governments, Indigenous Peoples, and local communities to foster cohesive, sustainable forest management, as well as promoting cross-sectoral benefits such as ecotourism.

## **3 CLARITY & SPECIFICITY OF THE MOTION**

- The motion is clear in requesting a voluntary, modular approach to landscape, complementary, but independent to FMU certification.
- The motion proposes concrete deliverables, including pilot projects in regions where landscape-level management is crucial for long-term forest conservation, evaluating governance mechanisms, promoting inclusivity and equity, and aligning existing FSC standards.
- The motion proposes strengthened monitoring and verification mechanisms aligned with the FSC system, ensuring that climate, biodiversity, and community indicators are systematically tracked.
- The inclusion of indigenous peoples and cultural landscapes is present, but underdeveloped. The proposal must ensure that outcomes go beyond targeted support or involvement towards mechanisms for upholding community, traditional and Indigenous Peoples rights. This can be challenging in jurisdictions with conflicts over land with local communities and/or Indigenous Peoples, and where government laws for Indigenous Peoples contradict FSC P&C and frameworks such as FPIC.
- The Motion calls for different forms of recognition or assurance: verification, project recognition, procedures, or optional landscape certification. This needs to be clarified early in the process, since it will influence integration with current Forest Management certification.

## **4 FEASIBILITY OF IMPLEMENTATION**

### **4.1 Estimated time needed from implementation start until closure of the motion:**

- ☐ Less than 6 months
- ☐ 6 months – 1 year
- ☒ 1 – 3 years
- ☐ More than 3 years

### **4.2 Estimated one-time costs:**

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR

- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### **4.3 Estimated ongoing costs (per year):**

- ☐ Up to 10.000 EUR
- ☐ 10.000 to 100.000 EUR
- ☒ 100.000 to 250.000 EUR
- ☐ 250.000 to 500.000 EUR
- ☐ More than 500.000 EUR

#### **4.4 (Pre)conditions for implementation**

- The project calls for minimizing cost and risk, specifically stating the preparation of a low-cost feasibility package, that is, confirmed external funding prior to pilot launch. However, for the implementation, the motion calls for ensuring that additional costs are covered by external financing (donors, development banks, climate funds, etc.), not by FMUs or FSC members. Therefore, financing the framework is needed and so robust and long-term business cases need to be explored.
- Dedicated project team, including a (technical) working group to develop the requirements, with expertise on standard development, engagement, multi-stakeholders' processes, forest management certification, impact verification, perhaps also legal expertise.
- Additional resources for monitoring and evaluation.

### **5 BENEFITS / IMPACT**

#### **5.1 Expected impacts of the motion**

- The proposed landscape framework is expected to significantly enhance FSC's impact by promoting holistic landscape management. This will lead to improved biodiversity conservation, increased climate change mitigation and strengthened social well-being, particularly for local communities and Indigenous peoples. The framework will foster regional collaboration, ensuring FSC contributes to a cohesive and sustainable landscape management approach. However, multiple goals increase complexity to design challenges.
- By fostering collaboration across ownerships, jurisdictions, and sectors, the motion will promote development of innovative alliances and coalitions across organizations, especially innovative models for finance.
- The proposed landscape approach can drive FSC expansion to new streams such as landscape restoration, conservation, and additional (carbon, biodiversity) initiatives and fundings previously not feasible by forest management unit certification.
- Landscape approaches may require innovative models for multistakeholder and multi-level governance, planning, monitoring, accountability and verification, which can be very complex and resource intensive.
- Landscape approaches also need to be locally and culturally adapted. Approach needs to balance enough flexibility with consistency and alignment.
- An unintended consequence may be that FSC will be in a better position to collaborate with governments beyond forest management issues, which could be especially beneficial in developing countries.
- Landscape certification is technically, administratively, and socially complex; and requires significant upfront and ongoing resources, both human and financial. However,

potential benefits can outweigh the risks and the complexity if incremental steps are taken (not big changes), for an adaptive implementation towards addressing the main challenges.

## **5.2 Synergies with work underway:**

- This motion builds on existing FSC initiatives, such as the IFL landscape pilots under Motion 23/2022 and ongoing FSC ecosystem services procedure. These initiatives provide valuable insights and a foundation for the landscape framework, allowing for a more seamless integration of climate change mitigation, biodiversity conservation, and ecosystem management strategies.
- The new Policy Innovation department of the restructured Policy & Performance Unit is preparing a discussion paper on internal and external landscape approaches and what could be FSC positioning. It builds on the work developed in the last years around Sustainable Intensification and Shared Values, revisiting FSC Theory of Change and assessing how to integrate and further expand the learnings and insights from those initiatives into the FSC normative framework.
- Some aspects of the motion could also be addressed by using existing FSC tools e.g., expanding the use of the Collective Impact methodology could serve as a governance model applied to different stakeholders within the same landscape. This model encourages collaboration and shared responsibility among stakeholders, including local communities, businesses, and conservation organizations. Additionally, the Economic Viability Tool could be utilized to assess cross-sectoral benefits and ensure that the landscape-level approach is economically sustainable. Both tools could enhance governance and collaboration across sectors, fostering synergies that support the landscape certification framework.
- There is a proposal from Motion 47 to address the landscape approach through an expanded Ecosystem Services verification, and this can be explored, although both approaches are different in scope, expected outcomes and complexity.

## **6 ALTERNATIVES**

*This section describes alternative ways to address the motion topic and redundancies with work underway.*

### **6.1 Connections to other motions:**

- This motion partially aligns with Motion 45/2025 (Amended) which focuses on enhancing IFL Conservation efforts, through mechanisms such as ecological monitoring and risk assessment. Motion 45 emphasizes the development of regionally tailored publicly supported landscape-level High Conservation Value (HCV2) assessments and management tools for critical ecosystems or jurisdictions.
- This motion can be revised alongside Motion 47/2025 (Amended): Promote FSC certification and ecosystem services verification as relevant climate change investment tools by widening the landscape approach to encompass diverse woodland ecosystems. In this proposed motion, it is suggested to expand ecosystem services procedure scope to make FM certification and ecosystem services claims more accessible for a wider range of forests managers in wooded areas not primarily used for timber harvesting.

### **6.2 Alternative 1: Connection with Motion 45.**

#### **6.2.1 Status**

- ☐ For potential consideration
- ☐ Planned / in preparation

☒ Already started

☐ Already exists

#### 6.2.2 Description

- The revision process of FSC P&C could potentially provide a certification pathway tailored to landscapes, but it has a broader scope, considering a landscape approach would increase the complexity of the process and may take even more time to be completed.

### 6.3 **Alternative 2:** Connection with Motion 47.

#### 6.3.1 Status:

☐ For potential consideration

☐ Planned / in preparation

☒ Already started

☐ Already exists

#### 6.3.2 Description

- The ES Procedure could potentially provide a certification pathway for landscapes, but it currently allows voluntary claims at the management unit level, while the proposed framework proposes integrated landscape-scale certification of whole ecosystems. The landscape proposal in this Motion considers also integrating contribution from different actors and even economic sectors, while ES should evolve from targeted at the CH and the forest management unit to broaden its scope.

## 7 **IN A NUTSHELL**

- A voluntary, strategic and operational modular framework for engagement and impact at the forest landscape level, complementary and independent from FMU certification will be designed, piloted, and evaluated, with costs covered by external finance, ensuring lessons and business models are ready for wider FSC system innovation. The framework is coordinated beyond the management unit boundaries in a modular scheme, inspired by FSC's Ecosystem Services Procedure (FSC-PRO-30-006) in spirit and positioning. Allow for different forms of recognition or assurance (verification, project recognition, procedures, or optional landscape certification), depending on feasibility and demand.

### 7.1 **Key open questions**

- Different forms of recognition should also be decided upon benefits for stakeholders as well as financial mechanisms. Allowing several forms of recognition and assurance may be counterproductive and complex, instead of selecting the best-fit from stakeholders and donors' perspective.
- How the improved access to climate finance would be managed/addressed? And how will it relate to the multi-stakeholder governance structure?
- How to articulate the monitoring of ecosystem services shared by different non-certified land users sharing the same landscape? There is also a need to define a "governance" structure for the data: who owns it, manages it, etc.
- Will there be a need for special structures and/or mechanisms to ensure small owners, family forests and marginalized groups' rights and needs are balanced against industrial sectors at the landscape level?