GLOBAL REVIEW OF CRITERION 6.5 OF FSC PRINCIPLES AND CRITERIA FOR FOREST STEWARDSHIP

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FSC FORESTS FOR ALL FOREVER™

Title:	Global Review of Criterion 6.5 of FSC Principles and Criteria for Forest Stewardship
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Objective of document:	To examine the issues faced by standard developers and certificate holders related to the development and implementation of the requirements of Criterion 6.5 and to identify recommendations related to achieving the Criterion's objectives.	
Confidential?	☐ Yes	☑ No
Intended audience	☐ Internal (FSC)	☑ External
Personal data included?	☑ Yes	☐ No

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EXECUTIVE SUMMARY

The purpose of this study was to examine the issues faced by standard developers and certificate holders related to the development and implementation of the requirements of Criterion 6.5 and to identify recommendations related to achieving the Criterion's objectives. Issues were identified and evaluated at FSC's global scale, which involved reviewing the national standards of 12 focus countries (two per FSC region), holding 45 interviews, conducting field visits to three of the focus countries, and completing a documentation review. Throughout the study, grappling with the requirement to achieve a minimum of 10% of certified area in Representative Sample Areas (in combination with other components of the Conservation Areas Network), was generally found to be the most challenging element of Criterion 6.5.

The study makes 11 recommendations, identified in detail below. Only one recommendation is prescriptive in counselling a specific content-related measure for the IGIs, and that is to retain the 10% minimum threshold for large and medium-sized forests. Reducing the 10% threshold for the larger certified forests is a higher risk as this is an important measure for conservation organizations, and this requirement distinguishes FSC from other certifications. Another recommendation is to make this requirement optional for small forest holders if they can implement an alternative approach that results in more positive outcomes for conservation. This can probably be done without changing the IGIs. Most of the remaining recommendations primarily address the need for FSC to provide guidance related to how the measures identified in the IGIs and other should be implemented and achieved.

Issues faced by standard developers

A few countries faced unwillingness by PSU and PSC to accept deviations from IGIs during standard development, particularly with respect to the 10% threshold. These SDGs were frustrated that approaches that they believed were innovative or nationally-appropriate were turned back by FSC. Some concern was expressed that 10% is too high a threshold and that there was not enough consideration given to the quality of RSAs/CANs; i.e., quality vs quantity should be a consideration. This leads to the temptation to allocate poorer-quality lands or lands not suited for development of high-quality forest ecosystems to the CAN instead of protecting ecologically valuable forest ecosystems that play a critical role in the ecosystem or that are poorly protected in the landscape.

Most countries agreed that the 10% threshold was appropriate compromise from economic and environmental perspectives, the threshold is generally perceived as a target, rather than a minimum to be exceeded when ecological circumstances necessitate. This was in part due to the lack of clear explanation of the rationale for the threshold Part of the issue regarding implementation of the 10% threshold was traced to the conceptual diagram (Annex D) included in the IGIs. Although it attempts to illustrate how the extent of the CAN should progress beyond the 10% minimum level it was generally found to be confusing and rarely used.

.Recommendations:

1. Provide information to inform certificate holders, CBs and SDGs of options that exist for potentially complying with the IGIs as well as problems and best practices known by the national offices.
2. Provide Guidance about the 10% minimum threshold.
3. a) Provide direction that clarifies that 10% is not a target for CANs, but a minimum.
   b) Develop an alternate and clearer way of expressing the intent of the threshold and its relationship with ecological qualities of the Management Unit.

Issues faced by certificate holders

Certificate holders faced several problems with implementation of the requirements of the Criterion, depending on their circumstances regarding the size of their holdings, and the nature of their forests. Interviews and field visits identified issues related to:

- Incorporation of Landscape Considerations;
- Implementation of the 10% threshold for medium/large forests;
- Implementation of the 10% threshold for smallholders (less than 50 ha);
- Meeting requirements related to representativeness of native ecosystems inside the CAN/RSA;
- Addressing restoration requirements in CAN/RSA; and
- The cost of implementation and loss of economic opportunity for medium/large forests.

Recommendations:

4. FSC should provide guidance regarding the manner in which landscape-level representation should be achieved, and benchmarks associated with appropriate levels of representation (see recommendations #3a and # 3b).
5. Keep 10% minimum threshold for medium and large forests.
6. Provide guidance that addresses the use of the 10% threshold (for example by making the min-imum threshold of 10% optional for small holders)
7. This is addressed through recommendation #2 by providing additional guidance regarding RSAs.
8. FSC should provide guidance on considerations that should be taken into account in planning and implementing restoration.
9. FSC should undertake (or review existing) cost/benefit analyses associated with the implemen-tation by certificate holders of the CAN requirements and identify regional opportunities (marketing, funding, collab-orations with conservation and park management agencies, etc.) to improve benefits relative to cost. Assess whether the benefits of CAN are adequately communicated in FSC materials.
10. FSC should work with Certification Bodies to improve auditing of Criterion 6.5
11. The guidance developed by FSC (see recommendation #2) should explicitly identify long-term objectives to be addressed through the implementation of the indicators of Criterion 6.5.

Ecological Outcomes

Generally, the 10% threshold was perceived as the most important component of Criterion 6.5 for achieving conservation gains. In many countries, at least part of the 10% already falls under the protection prescribed by government regulations. Requirements for restoration and representation are also important in achieving conservation gains and are identified as in need of further guidance from FSC as identified in recommendation #6 above.

Other benefits referred to by the interviewees include community benefits (which are often linked to natural forests), tourism, and mobilization of funding and personnel.

Contents

1 INTRODUCTION

In 2015, International Generic Indicators (IGIs) based on The FSC Principles and Criteria for Forest Stewardship V5-2, came into effect. Within Principle 6, which addresses environmental values and impacts, requirements related to Representative Sample Areas (RSAs) and Conservation Area Networks (CAN) are identified in Criterion 6.5 (and respective IGIs). Many national standards have been developed based on the IGIs and these standards have been implemented by certificate holders.

Challenges have been reported to FSC regarding the standard development and the implementation of Criterion 6.5. As a result, FSC has retained SmartCert to carry out a study to review issues and benefits related to Criterion 6.5. More specifically, the study has the following objectives:

- Identify and further clarify the difficulties faced by standard developers and certificate holders;
- Identify potential ways of addressing the identified difficulties;
- Identify and assess the ecological outcomes of implementing C6.5; and,
- Make recommendations on how to achieve the objectives of C6.5.

To address the study's objectives, the national standards of a selection of countries were reviewed, and a series of interviews was carried out for each of these focus countries. Site visits in two countries were conducted to expand on the insights gained in the interviews. In addition, the relevant literature for focus and non-focus countries was reviewed.

2 METHODS

In collaboration with FSC International, SmartCert selected 12 focus countries for the study where the transition to the new P&C for Forest Stewardship V5-2 national standard was in effect. The selected countries are: Cameroon and Gabon (Africa), Australia and Indonesia (Asia), Bulgaria, Sweden and Portugal (Europe), Mexico and Uruguay (Latin America), Canada (North America), Russia and Ukraine (CIS-Countries). In order to have two focus countries in each FSC region, input was also sought from the United States, where the national standard was currently under revision at the time of the study.

2.1 Literature Review

We performed an online search using a list of keywords for each focus country and more generally on the topic of conservation area networks in FSC certified forests. We also asked national or regional FSC offices if they knew of any relevant information about Criterion 6.5. This allowed us to identify relevant reports.

2.2 Interviews

For each focus country, a balanced selection of knowledgeable interviewees was made with the help of a contact person in the respective national or regional FSC office. Furthermore, we selected some additional experts from countries that were not from the focus countries because they came highly recommended in relation to the topic. The interviewees included standard developers, technical working group experts, certificate holders, auditors, and conservation experts.

An interview guide[1] developed for this study, that included specific questions for the type of experts consulted, formed the basis of the interviews, each of which lasted about an hour. A total of 45 interviews

[1] See Annex B Interview Guide.

were carried out as part of this study, with at least three interviews per focus country (exceptions: 2 interviews for the United States, 2 interviews for Russia and 1 interview for Ukraine). All interviews were conducted remotely.

Because of the war in Ukraine, we were not able to carry out the interviews in the CIS-Region in the same way as in the other focus countries. Instead, e-mail surveys were conducted using the interview guide mentioned above.

2.3 Field Visits

After completion of the interviews, field visits have been conducted in two of the focus countries. Based on the initial findings from the interviews and in collaboration with FSC staff, Indonesia, Bulgaria and Portugal were selected for this purpose.

In Indonesia the field visits focused on small holders on Java, in Bulgaria field visits were conducted in a private, community and state forests and in Portugal community forests were selected. We visited 3 certified forests in Bulgaria, 3 community forests of the same group certificate in Portugal and 10 certified small-holder forests in Indonesia from 2 certificates. Field visit guides[2] were used to ensure consistent compliance in all 3 countries.

The field visits aimed at:

- collecting data about the extent of CAN in certified forests, their representativeness, and their contribution to biodiversity conservation; and
- ground proofing key findings of the consultations.

The field visits consisted of:

- visiting certified forests and certificate holders;
- visiting conservation areas; and
- talking with staff and stakeholders about the identification process of conservation areas to ascertain strengths, weaknesses, challenges, and opportunities.

2.4 Analysis of results

The identified issues from interviews, field work, and literature review were sorted according to regions, forest types (large or small holders), ownership (state or private) and management systems (total or partial cuts) to reveal themes that emerged and their relevance to each region and dimension.

2.5 Risk evaluation

One component of the topic-by-topic analysis of sections 4.1 and 4.2 is the risk associated with the concern. In this context we provide a very brief assessment of risk associated with one or more topics:

- Loss of subscriptions to FSC either through certificate holders leaving the system, or by providing deterrence to new entrants entering the system;

[2] The Field Visit Guides are derived from the interview guides (Annex B) and tailored for each country to take into account the results of the interviews.

- Reducing engagement by FSC members (including SDGs);
- Reducing or endangering attainment of ecological benefits associated with RSAs or the CAN; and
- Loss of credibility of FSC.

In some cases, we provide an opinion on whether the intensity of the risk is high, moderate, or low and on the global or local extent of risk. These estimates are intended to portray our opinion of the probability that a detrimental effect may occur. They are not the product of detailed assessments, but rather represent our brief assessments. FSC may choose to do more structured risk analysis based on its own assessment of the topics we discuss.

2.6 Recommendations

Based on this analysis, a set of recommendations was developed to help FSC find solutions to the challenges faced by standard developers and certificate holders, and ultimately to achieve the objectives sought by Criterion 6.5.

3 RESULTS

3.1 Results of focus country interviews

The information gathered during the interviews for each of the focus countries is summarized in the table below.

Table 1 : Summary of interview results by country.

Requirements of Criterion 6.5 of the FSC National Standard[A]	Ecological outcomes identified through interviews and literature review	Concerns identified through interviews[B]
AFRICA		
Cameroon and Gabon		
The NFSS of Gabon[3] and the NFSS of Cameroon[4] apply to all types and scales of natural forests and plantations (FMUs, Communal Forests, Community Forests). Both standards are similar to the IGIs and include minimum thresholds of 10% for RSA/CAN. **In Cameroon, one exception is that indicators 6.5.1 and 6.5.2 for small forests refer to "unique ecosystems" compared to "native ecosystems" within the same indicators for large forests.** **In both countries, smallholders are exempted from requirements related to restoration (6.5.3) and representative area size (6.5.4).**	Most of the 10% is covered by existing legal protection and by areas that would not have been harvested in the MU. However, according to interviewed experts, the legal regulations are often not rigorously implemented by non-certified companies and therefore FSC certification leads to increased protection and respect of the protected areas. FSC's representativeness requirement has no equivalent in forestry regulations and allows for the protection of additional areas that are not represented in the conservation areas and sensitive environments protected by regulation. Therefore, criterion 6.5 improves the representativeness of conservation areas as some companies add small proportions of protection in forest types that were poorly represented in the pre-certification conservation network of	There are currently only large certified natural forests and therefore the concerns below are for large forests on state lands: • The representativeness of the RSA/CAN is a challenge because the forest typology is not always available. In addition, representativeness is not clearly defined in the standards, and this leaves a lot of room for interpretation and subjectivity. For example, questions that planners face when establishing the conservation area network are what scale should conservation areas be representative, what size should a sample area be to be representative and how to combine the representativeness of forest types and at the same time consider the habitat of wildlife species? • Criterion 6.5.2 of the French version of the Gabonese national standards refers to both native (écosystèmes natifs) and indigenous ecosystems (d'écosystèmes indigènes). This seems to be a translation error since the term "indigenous" is

[3] FSC-STD-GAB-02-2020 FSC National Forest Stewardship Standard of Gabon V(2-0)
[4] FSC-STD-CMR-02-2020 FSC National Forest Stewardship Standard of Cameroon V(2-0)

Requirements of Criterion 6.5 of the FSC National Standard[A]	Ecological outcomes identified through interviews and literature review	Concerns identified through interviews[B]
SDG participants felt that the IGIs already went far enough and therefore they were not changed. The 10% was perceived as a good compromise between conservation and exploitation of certified forests.	the MU and it helps ensure that conservation areas are effectively protected from logging and poacher intrusion.	not used in the English standard. This has created confusion since "indeginous ecosystem" is not defined and "native ecosystem" is defined very broadly in the glossary of terms. One of the experts interviewed mentioned that the definition of native ecosystem leaves too much room for interpretation. • It is difficult for auditors to verify if the conservation network is optimal, representative and protect areas of higher conservation value. • There is a cost to complying with Criterion 6.5 to ensure control of poaching and volume losses. One company mentioned that they had to put about 1% more land under protection because of Criterion 6.5, which represents about 500,000,000 CFA over the 30-year rotation.
ASIA-PACIFIC		
Australia		
The NFSS of Australia[5] applies to large natural forests and plantations as well as SLIMF. The 10% requirement explicitly permits inclusion of restoration areas. This is a simpler expression of the IGI requirement that does not recognize this explicitly but does so through the glossary definition of Representative Sample Area. **Much of Australia's managed forest estate is in plantation. According to the interviews, there are cases where the 10% is not achievable in the certified**	Conservation gains are likely where restoration has occurred within plantations (most commonly associated with watercourses), or where degraded lands are brought into MUs to be restored. Gains are not apparent where non-threatened natural forest has been brought into MUs. However, there were concerns expressed that the use of restoration is not sufficient to contribute meaningfully to achieving good-quality RSAs/CANs.	The concerns below apply to all of forest types. • There is not a consistent perspective about the value of the 10% threshold. Some view it as being arbitrary with little ecological significance; others view it as helpful in that it establishes a consistent benchmark. • Large corporate forest MUs generally meet/accept the threshold with less difficulty than small holders. Concerns exist that the threshold is a disincentive to maintain or achieve certification for medium and small holders.

[5] FSC-STD-AUS-01-2018 FSC National Forest Stewardship Standard of Australia V(1-0)

Requirements of Criterion 6.5 of the FSC National Standard[A]	Ecological outcomes identified through interviews and literature review	Concerns identified through interviews[B]
plantation and the restoration of plantation in conservation area is not an option for the certificate holders. There are instances in which forest managers have either leased or acquired natural forests and brought them into their MUs to raise the proportion of CAN lands. There are also instances in which managers brought degraded lands into their MUs to restore. It is not clear how many such instances there are.		• The threshold seems more challenging to meet in plantations than in natural forest. • The threshold is more challenging to meet on the mainland, than in Tasmania, as there remains a high proportion of natural forest (and forested land in general) in Tasmania. • There is no recognition in audit results of working towards the threshold, yet in some cases, the 10% is difficult to reach immediately. • Support was voiced for a landscape perspective in which there would be a consideration of the conservation context in the broader landscape in which a forest exists; the perspective is that certified forests that are in the neighbourhood of well protected natural areas may not need to meet the 10% threshold • Some concern was expressed that 10% is too high a threshold and that there was not enough consideration given to the quality of RSAs/CANs; i.e., quality vs quantity should be a consideration.
Indonesia		
The NFSS of Indonesia[6] applies to large natural forest, plantations and smallholders. The criterion 6.5 uses the same wording as the IGIs and requires the 10% RSA/CAN in all forest types.	In large state forests, the 10% is mostly covered by the existing protection required by regulation Because the forests are already protected, interviewees mentioned that there was probably little ecological benefits. However, some experts interviewed are of the opinion that protection is better in FSC-certified forests because certified companies monitor	The concerns below are related to the NFSS of Indonesia. The experts interviewed were generally of the opinion that the problems had been addressed in the Indonesian smallholder standard. However, the transition to this standard has just begun and it is too early to assess its impact.

[6] FSC-STD-IDN-02.1-2020 FSC National Forest Stewardship Standard of Indonesia V(2-1)

Requirements of Criterion 6.5 of the FSC National Standard[A]	Ecological outcomes identified through interviews and literature review	Concerns identified through interviews[B]
There was a consensus within the SDG to disagree with the 10% threshold for smallholders, however, keeping the 10% was requested by PSU. Since 2020, smallholders and group certificates were certified under the NFSS standard. **The FSC Forest Stewardship Standard for Smallholders in Indonesia (Version for the pilot test in Indonesia) is effective as of July 2022 and is being implemented[7]. This standard maintains the minimum threshold requirement of 10% but this threshold is not always applicable. This is because the applicability notes at the end of Criterion 6.5 indicate that "*The three Indicators in Criterion 6.5 are applicable ONLY IF there are native ecosystems present in the smallholder's forest or in the smallholder's location, OR if opportunities exist to restore areas in the smallholder's forest or in the smallholder's location to more natural conditions*."[8]**	and make efforts to protect conservation areas from legal and illegal harvesting activities.	• There is no problem meeting the 10% minimum threshold in large natural concessions or in large plantations. However, the 10% threshold is unrealistic for smallholders group certificate especially plantations. • In Java it is complicated to identify native ecosystems because forests have been cleared since the 18th century. Forest cover in Java is mostly Teak and Mahogany. Teak is not native and the native composition of stands with Mahogany is unknown. In this context it is unclear what are the representative areas required to be maintained. • For Small holders, different CB's have different approaches. Some CBs consider that the 10% is not applicable for small holders where native composition does not exist (as explained in the description of the standard requirements).
CIS-COUNTRIES[C, D]		
Russia		
The requirement of the NFSS of Russia[9] applies to all forest types. The criterion 6.5 indicators are strongly inspired by the IGIs but include clarifications in the	We had little information about protected areas in Russia. It appears that practically all forest areas have more than 10% of area protected because of large area of water protection	In Russia forest tenures are state owned and the vast majority of certified forests are large state land.

[7] FSC-STD-RAP-IDN-01-2022 Plantations EN FSC National Forest Stewardship Standard for Smallholders in Indonesia V(1-0)

[8] FSC-STD-RAP-IDN-01-2022 Plantations EN FSC National Forest Stewardship Standard for Smallholders in Indonesia V(1-0)

[9] FSC-STD-RUS-02.1-2020 FSC National Forest Stewardship Standard of Russian Federation V(2-1)

Requirements of Criterion 6.5 of the FSC National Standard[A]	Ecological outcomes identified through interviews and literature review	Concerns identified through interviews[B]
form of notes and directives. For example, the 6.5.2 directive provides clarifications on where to prioritize conservation areas based on size and naturalness. The standard includes the 10% threshold. **We did not find evidence that certificate holders, stakeholders or auditors see any issue regarding compliance with 6.5 and setting aside and conserving 10% of the FMU area.**	zones, presence of protected forest plots and HCVF almost everywhere. In general, the 10% protection is therefore achieved without reducing the area or harvesting is allowed in the certified MU. Although criterion 6.5 generates little increase in protection, it helps promote a general awareness for nature protection in Russia.	The two answers received from Russian experts and the literature review did not identify concerns in Russia, however, this may be due to insufficient sampling.
Ukraine		
The requirements of the Criterion 6.5 of the NFSS of Ukraine[10] apply to all forest types. They are similar to the IGIs except that there is an additional indicator to clarify that management activities are not allowed within the selected RSA, unless they maintain or strengthen RSA functions (6.5.3.). **In addition, requirement 6.5.6 is adapted from IGI 6.5.5 and specifies that the RSA/CAN is at least 10% of the Management Unit "w*ith proportional representation of main types of native ecosystems*."** **Finally, the Ukrainian standard includes several verifiers to help forest managers and auditors demonstrate conformance.**	We have not been able to conduct interviews about this topic in Ukraine, however, based on our teams knowledge, 10% protection was already achieved inside managed forests, however, the standard leads to increased representativeness of the conservation area. In the uncertainty and governance problems that would be normal in a post-war context, FSC audits will provide additional assurance that the integrity of conservation areas is being maintained.	In Ukraine the vast majority of certified forests are large forest on state land. Less than 0.1% of the total area of forest land is private[11]. One interview and the literature review did not identify concerns in Ukraine, however, this may be due to insufficient sampling.

[10] FSC-STD-UKR-01-2019 FSC National Forest Stewardship Standard of Ukraine V(1-0)
[11] FSC Facts & Figures in Ukraine

Requirements of Criterion 6.5 of the FSC National Standard[A]	Ecological outcomes identified through interviews and literature review	Concerns identified through interviews[B]
EUROPE		
Bulgaria		
The NFSS of Bulgaria[12] is applicable to all forest types (natural, plantations, large and SLIMF). It requires at least 5% of the MU is to be designated as old-growth forests, where human interference is not allowed. Old-growth Forest set-asides may be included as part of the 10% requirement. **In the areas set aside accounting for at least 10% of the MU, forest management is only allowed to restore degraded areas.** **For FMUs smaller than 50 ha, the 10% requirement is reduced to 5%.**	In Bulgaria, indicator 6.5.4. provides for the maintenance of 5% of the territory in old-growth forests where human interference is not allowed. The set-aside of old growth in FSC certified forests is a significant conservation gain.	The following concerns are applicable to large state forests, community forests and forests owned by cooperative with private members: • There is some disagreement with the 10% approach from the forest industry, particularly regarding restrictions on harvesting within RSAs. • 10% requirement could be an impediment for entraining new entrants, particularly small holders (although these are relatively few in Bulgaria). There is concern that the benefits of achieving certification, given the 10% requirement does not offset the costs of the certification process. It could also be an impediment for CHs with significant plantation areas. In this regard, it was identified that PEFC's standard has no requirements for protection of RSAs. • It was expressed that the CAN threshold should be less than 10% for FMUs less than 10,000 ha.
Portugal		
The NFSS of Portugal[13] is applicable to all forest types (natural, plantations, large and SLIMF). It is applicable to all forest types. However, indicator 6.5.3 about restoration of RSA is not applicable to SLIMF and	In Portugal 91% of all forest areas are on private land. These areas are therefore important for forest protection. A study shows that criterion 6.5 associated with HCVs (P9) are an	FSC FM certification in Portugal occurs mainly through groups of private smallholders. The following concern is applicable to smallholder groups:

[12] FSC-STD-BGR-01-2016 FSC National Forest Stewardship Standard of Bulgaria V(1-0)
[13] FSC-STD-PRT-01-2016 FSC National Forest Stewardship Standard of Portugal V(1-1)

Requirements of Criterion 6.5 of the FSC National Standard[A]	Ecological outcomes identified through interviews and literature review	Concerns identified through interviews[B]
criterion level guidance notes clarify that "*In the case of group certificates, the criteria can be fulfilled at group level.* "Finally, guidance in the indicator 6.5.5 requiring the minimum of 10% conservation provide flexibility for SLIMF. "*Guidance note: In the case of small-scale SLIMFs, the area reserved for this purpose may be less than 10 per cent, if properly justified in environmental, economic, and social terms.* " **The group level approach takes into consideration the small size of individual woodlots which would make protection at the individual forest level impracticable.**	important mechanism for maintaining and improving biodiversity. Conservation areas have not changed with FSC certification, neither in size (already 10%) nor in management strategy. Most of them are protected by the Natura 2000 network. Our field visits also reveal that some areas inconsistent with the conservation objectives of criterion 6.5 such as deforested areas (fire buffers and power lines) are included in the conservation areas. The ecological benefits of these conservation areas is low or non-existent.	• The 10% threshold is well accepted as long as it can be implemented at the group level instead of the individual forest. The main concern is if each property should need to respect the 10% threshold individually. It would be impracticable. The most part of the properties are not bigger than 1-2 hectares in the North and Central regions of Portugal.
Sweden		
In the NFSS of Sweden[14] applies to large natural forests and plantations as well as SLIMF. The 10% requirement is split into two components – 5% mandatory biodiversity conservation, and 5% additional conservation that can include biodiversity and/or social and cultural features or purposes. This approach takes into account the rarity of natural forests in Sweden and the tremendous importance of natural and managed forests for social and cultural uses. A large forest cooperative provides an economic incentive related to the extent of area protected.	According to our interviews, the increase to 10% conservation is viewed by some as critical to FSC survival in Sweden. In Sweden the 10% CAN has led to increased protection in MU.	The following concerns are applicable to all forest types: • There is some indication/ speculation that C6.5 and 10% requirement may deter potential existing CHs and new entrants (particularly small holders and groups) in to FSC, but this is not certain. The potential impact would likely be slight as much of the existing certificate land base is in large companies that apparently have a secure 10% CAN allocation. • 10% ask is a considerable increase over previous standard • 10% is now interpreted as a maximum level, and the standard may deter managers from going beyond that level. • There was also a concern expressed that by permitting the 5% social uses, there becomes less incentive to engage in restoration.

[14] FSC-STD-SWE-03-2019 FSC Forest Stewardship Standard of Sweden V(3-0)

Requirements of Criterion 6.5 of the FSC National Standard[A]	Ecological outcomes identified through interviews and literature review	Concerns identified through interviews[B]
The indicators also include a requirement for monitoring of the areas set aside. And although it is specifically pointed out that long-term nature conservation is targeted through this Criterion, periodic revisions of the selected areas are indicated to ensure that where possible nature conservation benefits are constantly increased. **All indicators are provided with detailed directives and/or guidance.**		• There is an unclear relationship between the RSA/CAN requirements and the designation of 'Woodland Key Habitats' related to previous requirements for protection and changed regulatory requirements related to their identification and management.
LATIN AMERICA		
Mexico		
The NFSS of Mexico[15] standard applies to large natural forests and plantations as well as small and low intensity managed forests (SLIMF). Criterion 6.5 requirements are similar to the IGIs however, the indicator 6.5.5 specifies that 10% of the Management Unit needs to be identified in a manner consistent with the Management Unit Conceptual Diagram and depending on the size of the management unit, management intensity, and level of intensity of management, and the level of protection in the landscape.	According to the interviews conducted, in most cases in Mexico, the 10% is achieved by protecting sensitive areas and low productive areas that would be harvested anyways. According to the interviews, criterion 6.5 provides little or no improvement in the proportion of CAN. In some MUs, there is probably an improvement in the representativeness and quality of the CAN.	The interviews did not identify concerns related to large natural forests but the following concerns are related to smallholders: • There is a potential concern for smallholders that are typically part of group certificates. It would not be possible if each individual forest needed to achieve the 10% protection. The problem is more acute when it comes to small private plantations. Currently, the problem is managed by identifying the 10% at the group level. • Another issue for smallholders is that the standard has become too complicated. Understanding the standard is difficult for small holder groups that have less internal capacity and competence.

[15] FSC-STD-MEX-02-2021 FSC National Forest Stewardship Standard of Mexico V(2-0)

Requirements of Criterion 6.5 of the FSC National Standard[A]	Ecological outcomes identified through interviews and literature review	Concerns identified through interviews[B]
Uruguay		
The NFSS of Uruguay[16] is applicable to large and small (SLIMF) plantations. Criterion 6.5 indicators are aligned with the IGIs including the 10% threshold. **The standard also includes verifiers to help guide certificate holders and auditors.**	According to interviews, the 10% threshold does not bring great additional benefits because in general certified plantations are on non-forest lands. Sensitive area such as river buffers and natural forests are protected, and this generally represents 20% - 25% of the management unit.	The following concerns are applicable to both large and small (SLIMF) plantations: • In the case where the companies lease land, the management plan would only cover the planted area which would make it difficult to achieve the 10%. • For small holder plantations it may be difficult to achieve the 10% conservation.
NORTH AMERICA		
Canada		
The NFSS of Canada [17] is applicable to large state and private lands but it is not applicable to forests below 1000 ha. Criterion 6.5 is by far the longest reviewed as part of this study. It contains 12 indicators. The IGI V5 small holder standard is currently in development and will apply to forests smaller than 1000 ha. **The 10% approach is presented as a minimum goal for the CAN. However considerable direction is given in a specific indicator that identifies the considerations that are to be taken into account in identifying the overall extent of the CAN. In this way there is an attempt to highlight that 10% is not intended to be construed as a**	Consultation with stakeholders is required for the identification of conservation areas. This allows for different interests to be considered in the identification of the CAN and probably improves representativeness. The extent to which the Criterion's approach will result in a conservation gain is context- dependent. For existing certificates, the new approach may not result in a conservation gain, as some of the previous standards (FSC boreal standard) required CHs to make a 'maximum contribution to filling gaps'. Conservation gains may be realized if the existing CAN, analyzed using the landscape approach, identifies gaps that need to be filled.	The following concerns are applicable to all forests in the scope of the NFSS of Canada (i.e., forest larger than 1000 ha): • There may be regional disparities in which the bar for achieving conformance is greater in western Canada than in central and eastern Canada; • The landscape approach should not be used to rationalize targets lower than 10% on MUs. • Management Units that have extensive and intact landscapes should retain significant areas of such landscapes as they are more important for some sensitive biodiversity elements than are MUs that have fragmented landscapes.

[16] FSC-STD-URU-01-2021 FSC National Forest Stewardship Standard of Uruguay (plantations) V(1-0)
[17] FSC-STD-CAN-01-2018 FSC National Forest Stewardship Standard of Canada V(1-0)

Requirements of Criterion 6.5 of the FSC National Standard[A]	Ecological outcomes identified through interviews and literature review	Concerns identified through interviews[B]
maximum extent of the CAN. This is stated explicitly in the indicator's Intent Box. **The Criterion includes implementation of a landscape approach intended to bring consideration of the area beyond the MU's boundaries into an analysis of conservation area gaps in the area of ecological influence of the MU. This analysis must be conducted with the involvement of affected and interested parties** **The Criterion also recognizes different management obligations for publicly owned, vs. privately owned MUs. CHs are obliged to explicitly work towards inclusion of CAN areas in publicly managed regulated areas, whereas this is not required for private lands. An indicator also provides that certificate holders must work within their sphere of influence to have protected areas formalized within the certified forest CAN.**		• It may be possible to offset the cost of retaining extensive areas of CAN by using extended-rotation forestry. In this model, the area permanently put aside would decrease, but forests areas would be in old-growth condition for longer while still being available for harvesting, offsetting the loss of permanently reserved areas. There was not universal acceptance of this model in Canada.
United States[E,F]		
The NFSS of the United States DRAFT 2[18] will apply (when it will be effective) to large natural forests and plantations as well as SLIMF. It uses the same wording as the IGIs version 5 including the protection of 10% of the certified forest. **For some indicators the US standard contains separate direction for Federal Land, Family Forests, and**	As the standard is not final, it is not possible to say definitively whether there will be conservation gains. However, we were informed of concerns expressed by some that the Criterion's requirements may be too aggressive and therefore lead to loss of participation in FSC, which would be a conservation loss. However, it is not clear how widespread this concern is.	The concerns below apply to all of these forest types. • Concerns were expressed about attainability of 10% for small holders, and for group certificates for whom identifying an equitable approach to sharing the 10% 'burden' is difficult. • Given that the standard is not yet approved or, obviously, being applied, it is premature to identify concerns that arise out of the application.

[18] See Annex A

Requirements of Criterion 6.5 of the FSC National Standard[A]	Ecological outcomes identified through interviews and literature review	Concerns identified through interviews[B]
Plantations, however there is no difference in the 10% requirement across these forest categories. **Differences for family forests exist for restoration requirements and the extent of conserved areas for native ecosystems.** **For federal lands, there is explicit direction to conserve or restore native ecosystems regardless of their state on lands outside of the MU.**	The requirement related to the restoration (Indicator 6.5.3) is perceived as a conservation gain.	

A – See Annex A for wording of the IGIs and the sample countries' NFSS of Criterion 6.5.
B – An overall analysis by type of concern is provided in Sections 4.1 and 4.2.
C – Information from Russia and Ukraine based on Email and the experience of our team.
D – Only one respondent from Ukraine and three from Russia.
E – Input from the United States based on only two interviews.

F – United States Standard is not final, at the time of interviews, consultation on the 2nd draft is closed, and the intent is to send the third draft to PSU by the end of December 2022.

3.2 Field visits

Indonesia

In Indonesia, we focused our efforts on visiting two smallholder group certificates located in Java. Both smallholder groups are certified to the Indonesian FSC FM standard 2020[19]. In this standard Criterion 6.5 applies to both large and SLIMF.

Source of the map: iStock. Credit: Olli Turho

Visit #1	The group certificate has 2,177 different smallholdings and is managed by a private company. The total certified area is 363 ha and the average size of each individual member is about 0.17 ha. The certificate holders plan to transition to the new plantations standard for smallholders in Indonesia[20]. The group certificate holder does not meet the 10% requirement and feels that the requirement is impossible to meet. They feel 6.5 is not appropriate and not applicable to their situation – very small farmers, scattered, with a very mixed non-natural forest and with no natural forest anywhere in the vicinity. The removal of natural forest goes back generations, and they have no knowledge or reference about what a natural forest would look like. The auditors understand the situation and they are satisfied with the group's approach even though technically they have not achieved 10%.

[19] FSC-STD-IDN-02.1-2020
[20] FSC-STD-RAP-IDN-01-2022

Picture 1: Mixed Forest Conservation Area. *Photo by Keith Moore.*

Picture 2: Mixed Forest Conservation Area. *Photo by Keith Moore.*

Visit #2	The group certificate has 1,723 smallholder members and is managed by a co-operative. The total certified area is 957 ha and the average size of each individual member is about 0.5 ha. The certificate holder has heard of the new plantations standard for smallholders in Indonesia[21] but has not yet made a decision on whether to transition to this new standard. The certificate holder meets the 10% threshold by having some members not harvest anything from their land for a period of five years. That way, samples of the existing forest ecosystems are retained and are counted as contributing to the 10%. There is no native or natural forest anywhere in any of their small holdings or nearby. They have no information on what the natural forest was, so they cannot restore them. The certificate manager staff stated that they do not understand the need for this requirement. This approach causes some problems notably because new members are reluctant to join, or they drop out after they join the group.  Picture 3: Hillside Conservation Area. *Photo by Keith Moore.*

[21] FSC-STD-RAP-IDN-01-2022

Bulgaria

In Bulgaria we visited 3 certificate types (i.e., one large state forest, one municipal forest and one cooperative forest). All certificates are certified to the Bulgarian national standard for Natural and Plantations Forest and Small and Low-intensity Managed Forests (SLIMF)[22].

Source of the map: iStock. Credit: bergserg

Visit #1	The certificate holder manages a multisite certificate including 16 Management Units (MUs) on state land totalling a certified area of 244,868.50 ha. The 10% CAN threshold is met. Some of the MUs have poplar plantations covering a significant part of their area -in 3 MUs they cover more than half of the area. The natural forests in these MUs are intensively managed, and it is difficult to find and select stands that have characteristics of old-growth forests (required in Criterion 6.5 of the NFSS of Bulgaria[23]). It was particularly difficult to achieve the threshold of 10% for small-scale MUs with a high proportion of plantations. Other challenges include the restrictions on: 1) sanitary and salvage logging; 2) construction of forest roads in RSA, especially in mountainous areas; and 3) conversion of coppice stands into seed stands by felling is not considered a restoration activity by the Bulgarian standard.

[22] FSC-STD-BGR-01-2016
[23] See Annex A for details

According to the interviewees, the 10% threshold in itself does not stop organizations from seeking certification, but the complexity of FSC requirements as a whole can be a disincentive to certification.

Picture 4: Floodplain Forest Aleko Island Conservation Area. *Photo by Stanislav Lazarov.*

Visit #2

This municipal forest is a single certificate of 14,218.10 ha. The 10% CAN threshold is met.

The certificate holder has no issue with the 10% threshold. The main challenge was to identify suitable forest ecosystems that meet the other 6.5 criterion requirements of the NFSS of Bulgaria, including old growth forest and other areas that have important ecological and recreational functions.

Picture 5 : Old-growth *Quercus frainetto* Conservation Area. *Photo by Stanislav Lazarov.*

Picture 6 : RSA Floodplain Forest on Ropotamo River. *Photo by Stanislav Lazarov.*

Visit #3

The certified area is a single certificate of 1,640 ha. It is owned and managed by a cooperative composed of 2,910 private shareholders.

The 10% CAN threshold is met. The first challenge was to identify natural forest ecosystems to be designated as representative samples, including old-growth forests. After the establishment of the CAN, the main challenges were the decreased revenue associated with the reduction in harvest by the cooperative shareholders. These restrictions lead to considerable tension between the management of the cooperative and the shareholders.

Picture 7 : Old-growth Coniferous Forest Conservation Area. *Photo by Stanislav Lazarov.*

Picture 8 : Scot Pine Stand Conservation Area. *Photo by Stanislav Lazarov.*

Portugal

In Portugal, we visited three community forests of 797 ha, 1396 ha and 796 ha that are part of the same smallholder group certificate east of Porto. The forests are certified to the Portuguese FSC FM standard 2016[24].

Source of the map: iStock. Credit: AVvector.

Report on the visit	The group certificate has 6700 different private smallholdings and 30 community forests and is managed by a private company. The total certified area is about 60 000 ha and the average size of each individual private owner member is about 4 ha and the average size of the community forests is about 1 000 ha.

[24] FSC-STD-PRT-01-2016

In community forests, conservation area planning is done in consultation with community members. The certificate manager confirmed that they are achieving 10% conservation certificate-wide but that this would be impossible for each individual forest. There are several reasons for this. Firstly, most of the forests are small and have been entirely transformed into pine and/or Eucalyptus plantations for a long time. The owners expect to harvest the entire plantation area. Another problem is that the restoration of natural forest following plantations present challenges. At many of the sites visited, planting on burned soils as well as the extraction of soils for use as fertilizer in cultivated fields has removed the forest litter that is needed for natural tree species such as native oak species like Pyrenean oaks (Quercus pyrenaica). So before restoring the natural forest it will be necessary in many places to restore the forest litter.

During our visits we observed forest conservation areas that coincided with stands of natural, planted or restored oak. In one case we observed an area that was in the process of restoration where oak trees had been planted.

Picture 9: Oak conservation area on a mountain side. *Photo by Noémie Huybrechts.*

Picture 10: Restoration area with newly planted natural species. *Photo by Noémie Huybrechts.*

We observed other areas included in the conservation area network that no longer had forest cover including fire buffers around communities and power transmission corridors.

Picture 11: Fire buffers around communities included in the CAN. *Photo by Noémie Huybrechts.*

Picture 12: Power transmission corridors included in the CAN. *Photo by Noémie Huybrechts.*

According to interviews with the certificate manager who manages both community and private forests, the same challenges are found in small private forests as in community forests, but in addition, ~~community forests~~ small private forests are very small which further reduces the potential for identifying conservation areas.

4 RESULT ANALYSIS

As is described in table 4.1 and summarized by theme below, our analysis revealed a number of issues for which further direction from FSC is needed to clarify, direct, and/or provide advice on the manner in which the requirements of the Criterion 6.5 and its IGIs should be interpreted and implemented. The recommendations provided below do not identify which of FSC's document types (i.e. Policies, Procedures, Advice Notes, Guidance Documents, Interpretations, or Directives) should provide the guidance, leaving that discretion it up to FSC. Further, FSC may choose to 'bundle' topics or deal with them individually.

4.1 Problems faced by standard developers

4.1.1 Rigidity of PSU and PSC

Scope: Countries where this concern was raised are shaded.

AFRICA	ASIA-PACIFIC	CIS-COUNTRIES	EUROPE		LATIN AMERICA	NORTH AMERICA
Cameroon	Australia	Russia	Bulgaria	Sweden	Mexico	Canada
Gabon	Indonesia	Ukraine	Portugal		Uruguay	United States

Apart from the focus countries, this concern has been reported for New Zealand, Peru, Ecuador. The concern was not raised in Portugal, Sweden, United States, Mexico, Uruguay, Gabon, Cameroon, Bulgaria, Russia and Ukraine.

Context in countries where this is not an issue:

In countries where this is not an issue, the applicability of IGIs was not questioned.

Context in countries where this is an issue:

The main concern related to standard development, as expressed by SDG members from some countries, was the lack of willingness from of PSU and PSC to accept indicators that deviated from IGIs, particularly in relation to the 10% threshold. In the development of country indicators, SDG's are given leeway to adopt, adapt or drop IGIs providing that acceptable rationale is provided (for adaptation or drop). We note that this was not the opinion of all SDG's but for those that held this view, it was quite adamant.

Risk associated with this issue:

IGIs create common ground in each country but SDG participants expressed the view that the development of effective standards require more flexibility and that PSU/PSC's rigidity had the effect of reducing the level of engagement of SDG members. We consider the global risk of reducing engagement to be moderate because it has been raised in three focus countries and has been brought to our attention in other countries too. However, at the same time this has been raised by people that remain engaged despite the frustrations related to this issue.

Recommendation #1:

Provide information to inform certificate holders, CBs and SDGs of options that exist for potentially complying with the IGIs as well as problems and best practices known by the national offices.

Rationale:

PSU/PSC must continue to play the important role of ensuring consistency between standards and ensure that the level of requirements is similar among countries. In this regard it is natural that PSU/PSC requires all SDGs to work with a common threshold. However, there could be systemic improvement in cases where the applicability of IGIs or PSU/PSC guidance is questioned by several SDGs. PSU/PSC should be able to identify these recurring concerns and consider revising its guidance if necessary/justifiable.

In the course of gathering information for this project, it has become apparent that there is a suite of creative approaches that are consistent with the Criterion 6.5 IGIs in fostering valuable Conservation Area Networks while also recognizing the economic and cultural priorities of countries and certificate holders. Among these are Sweden's approach of incorporating culturally- valuable areas into the 10% threshold, approaches to sharing the 10% responsibility among group members as used by several countries, and Canada's use of the concept of Area of Ecological Influence around the certified forest to identify gaps in the protected area network. FSC should provide information documents that draw attention to innovative approaches to inform certificate holders, CBs and SDGs of options that exist for potentially complying with the IGIs.

More generally, it would be appropriate for the national offices to work with the SDGs to conduct an evaluation of the standard and its implementation prior to the next update cycle of the FSC national standards. This could potentially be done as part of the review report process outlined in section 12 of the FSC-STD-60-006. The review report submitted by national offices (or an SDG where there is no national office) to PSU is expected to outline the strengths and weaknesses of effective standards. PSU/PSC could advise national offices to place emphasis on criterion 6.5. and could compile and disseminate an update describing the problems, innovative approaches and good practices associated with criterion 6.5. Standard developers should be encouraged to take into account these results. This exercise will also provide information on recurring issues and help determine if changes to PSU guidance are needed.

4.1.2 Acceptance of the 10% conservation threshold

Scope: This is a global concern raised by some experts in all countries. All countries are shaded.

AFRICA	ASIA-PACIFIC	CIS-COUNTRIES	EUROPE		LATIN AMERICA	NORTH AMERICA
Cameroon	Australia	Russia	Bulgaria	Sweden	Mexico	Canada
Gabon	Indonesia	Ukraine	Portugal		Uruguay	United States

Context in countries where this is an issue:

We heard frustration that the 10% threshold, as presented in the IGIs was not well justified or explained and this led to frustrations that alternative approaches put forward to PSU/PSC were not accepted during the standard development and approval process. This frustration was heard from some individuals who believed the threshold was too high, others who believed the threshold was too low, and others who just sought a defensible rationale for its implementation.

The Instructions to Standard Developers for Criterion 6.5 note that: "*Since 2011, the FSC Policy and Standards Committee, on behalf of the FSC Board of Directors, have consistently applied a minimum threshold of 10% of the Management Unit to all FSC National Standards through the national standards*

approval process. This threshold is written in FSC Forest Stewardship Standards: structure, content and suggested indicators FSC-GUI-60-004 V1-0 at Criterion 6.2. This document has been the key reference for Standard Development Groups since it was approved in 2011."

The quoted text above can be interpreted as : "*That's the way we've always done it, and so that's how it should stay…*" Although the majority of interviewees consider the 10% threshold to be an acceptable compromise from an economic and environmental point of view, this threshold is perceived by some as arbitrary. Why not select a minimum threshold of 5, 15 or 20%?

Risk associated with this issue:

There is a moderate global risk that the lack of information about the 10% minimum threshold will lead to less engagement of the SDG but also poorer implementation by CHs and auditors.

Recommendation # 2:

Provide Guidance about the 10% minimum threshold.

Rationale:

The 10% minimum is generally accepted and should be retained for medium/large forests. However, the reasoning behind FSC's choice to implement this threshold as well as the history of this requirement and its benefits should be better explained by FSC. This could be done by producing an information document about RSA/CAN in certified forests for companies, SDG and FSC members. The guidance documents should give a clear explanation of the rationale for the 10% threshold that is not based on previous use of the threshold by FSC, but by scientific and ecological rationale.

Developing guidance about the 10% threshold is also an opportunity to provide better guidance on other aspects of Criterion 6.5. According to an unpublished confidential report (2022), the provision of better guidance on the RSA concept will help strengthen it and "*improve CH decision-making in the location and configuration of RSAs and ensuring meaningful landscape or conservation network connectivity*"[25]. Other topics that could be addressed in the guidance are:

- How to define the proportion of protection in the MU (see related concern in section 4.1.3 below)
- Representativeness of native ecosystems Inside the conservation network (see section 4.2.4)
- Considerations regarding the restoration (e.g., native vs. indigenous ecosystems, use of novel approaches for restoration such as leasing/purchasing land for restoration purposes, etc.) (see section 4.2.5)
- Description of the objectives of the RSA/CAN, what types of areas are eligible and on the appropriateness of management activities within the selected areas (including extended-rotation forestry). (see section 4.2.8)

When developing guidance, FSC should be careful about the terms used. Some FSC interpretations (INT-STD-01-001_09, INT-STD-01-001_12, INT-STD-20-007_44/INT-STD-30-005_08, INT-STD-20-007_45, and INT-STD-30-005_03)[26] refer to the words "set-aside" instead of conservation area network. Set-aside is not used in the IGIs. It is best not to use multiple terms that have the same meaning as this can create confusion.

[25] Unpublished confidential report (2022)
[26] https://fsc.org/en/document-centre/documents/retrieve/73ec052d-d14f-4809-a209-2a985840a03e

4.1.3 Annex D (conceptual diagram)

Scope: This is a global concern raised by at least some experts consulted in each country. Consequently, all countries are shaded.

AFRICA	ASIA-PACIFIC	CIS-COUNTRIES	EUROPE		LATIN AMERICA	NORTH AMERICA
Cameroon	Australia	Russia	Bulgaria	Sweden	Mexico	Canada
Gabon	Indonesia	Ukraine	Portugal		Uruguay	United States

Context in countries where this is an issue:

Annex D attempts to illustrate how the extent of the CAN should progress beyond the 10% minimum level based on the scale of the management unit, the intensity of management, and ecosystem status or value in the landscape. The instructions for Standard Developers in the Annex provide normative direction: "*Standard Developers **shall** use the diagram to inform the development of appropriate guidance at the national level and regional level for the creation of Conservation Area Networks*." This direction is provided to some extent in IGI 6.5.4, but it is not clear in the IGI that this direction is additive to, or not constrained by, the 10% minimum level as prescribed in IGI 6.5.5.

Some national standards provide a basis for exceeding 10% through inclusion of IGI 6.5.4, or a similar indicator. For example, the NFSS of Mexico includes a reference to the conceptual diagram in its indicator 6.5.5. However, from our discussions with country experts, the possibility of exceeding 10% was rarely embraced. The link between 6.5.4 and the Annex D requirement that identified 10% as a floor from which to build was either not understood, acknowledged, or implemented. The 10% minimum level dominated implementors perception of the requirements to the extent that 10% became a target, rather than a minimum, and as Annex D was found to be confusing by most implementors and some SDGs, its utility was marginal.

In almost all conversations that we had with experienced individuals in countries, there was not found to be expectations that the CAN contribution would exceed the minimum threshold in response to indicators' requirements. As the impression that 10% is a target rather than a minimum that should be exceeded under circumstances described in the Annex seems firmly in place in the implementation of National Standards, it will be challenging to revisit.

Risk associated with this issue:

Based on our interviews there is a high global risk that there is a misunderstanding of the requirements on the part of companies and the SDGs. There is also a high global risk of lost opportunities to develop more appropriate CANs. Finally, there is a low global risk of companies dropping out of certification.

To address this (somewhat), guidance could be developed that emphasizes that the 10% minimum is not to be treated as a target, but rather the bottom end of a range of desirable levels, that depend on the qualities that are presently captured in Annex D.

Recommendation #3a:

Provide direction that clarifies that 10% is not a target for CANs, but a minimum.

Recommendation #3b:

Develop an alternate and clearer way of expressing the intent of the threshold and its relationship with ecological qualities of the Management Unit.

Rationale:

Annex D attempts to show that the relative size (i.e., proportion) of area protected is expected to increase based on the three independent variables or considerations. To a large extent, the graphic nature of the Annex was found to be confusing, and this contributed to its lack of use. Below, we offer a tabular version of the key notions in the Annex that could be considered as an alternative to the existing Annex. Note that the proportions identified in the table are for illustrative purposes only, intended to convey that the table/Annex would communicate the same expectation as in the present graphic version of the Annex - that the extent of protected would increase based on the three considerations (MU Size, Management Intensity, and Ecosystem Value).

Acceptable CAN Proportions

Management Unit Size	Management Intensity		
	Light	Moderate	High
Low protection at the landscape level			
Small	Minimum 15%	Min.15%	Min. 20%
Medium	Min.15%	Min. 20%	Min. 25%
Large	Min. 20%	Min. 20%	Min. 25%
Moderate protection at the landscape level			
Small	Minimum 12%	Min.12%	Min. 17%
Medium	Min.12%	Min. 17%	Min. 22%
Large	Min. 17%	Min. 17%	Min. 22%
High protection at the landscape level			
Small	Minimum 10%	Min.10%	Min. 15%
Medium	Min.10%	Min. 15%	Min. 20%
Large	Min. 15%	Min. 15%	Min. 20%

The table could be provided without actual numeric values but shading to illustrate increased expectations beyond the 10% minimum. Darker shading indicates the extent to which the CAN proportion should exceed the 10% minimum

Management Unit Size	Management Intensity		
	Light	Moderate	High
Low protection at the landscape level			
Small	Minimum 15%		
Medium			
Large			
Moderate protection at the landscape level			
Small	Minimum 12%		
Medium			
Large			
High protection at the landscape level			
Small	Minimum 10%		
Medium			
Large			

4.2 Issues faced by certificate holders

In this section we have grouped all the problems faced by certificate holders.

4.2.1 Incorporation of Landscape Considerations

Scope: Countries where this concern was raised are shaded.

AFRICA	ASIA-PACIFIC	CIS-COUNTRIES	EUROPE		LATIN AMERICA	NORTH AMERICA
Cameroon	**Australia**	**Russia**	**Bulgaria**	**Sweden**	**Mexico**	**Canada**
Gabon	**Indonesia**	**Ukraine**	**Portugal**		**Uruguay**	**United States**

This concern is primarily related to the requirements of IGI 6.5.4 which requires that: "*The size of Representative Sample Areas and/or restoration areas is proportionate to the conservation status and value of the ecosystems at the landscape level, the size of the Management Unit, and the intensity of forest management.*" This concern is more relevant for large Management Units.

Context for countries where this is not an issue:

In countries where this is not an issue, forest management units tend to be smaller. This concern was not identified as a concern in tropical countries where selective logging is the main timber harvesting method used.

Context for countries where this is an issue:

In countries where this is an issue, forest management takes place at landscape-scales (and frequently with high intensity management), and there is concern regarding maintenance of landscape-scale processes and ecosystem representation in CAN and RSAs at the landscape scale. The concern was often that RSAs, while capturing an appropriate amount of area relative to the size of the MU, may not capture ecosystem representation at that scale. This has led to further concerns that CANs may not provide ecosystem value appropriate relative to their overall size. In Canada, this concern is extended so that ecosystem representation within MUs is required to take into account broader ecosystem distribution in the ecological units that transcend the size of the MU.

FSC Canada's requirements for addressing Conservation Area Network obligations are innovative in that they recognize that the ecological character of lands surrounding the management unit should be taken into account in identifying conservation needs within the management unit. The 'Area of Ecological Influence' (AEI) includes the entire area encompassed by ecological units (e.g., ecodistricts, biogeoclimatic zones) that occur at least partly within the Management Unit. The intent of using the AEI in the gap analysis is to incorporate a broader landscape perspective into consideration of the Conservation Areas Network. The 10% requirement is addressed in Canada's Indicators, but consideration of the nature of the conserved lands outside of the management unit can help identify priority conservation features within the management unit.

Al-Pac, an FSC-certified Management Group in northern Alberta encompasses an area of almost 6 million ha. Al-Pac has worked with several partners in assessing conservation needs – Mistik Management Ltd. (the manager of a neighbouring FM-certified Management Unit), and the conservation groups Ducks Unlimited Canada and the Canadian Parks and Wilderness Society. Indigenous communities, and interested and affected stakeholders, and provincial governments were also engaged during the project.

The project has objectives associated with each of its three phases, paraphrased below:

1. Complete a gap analysis that assesses ecological representation of various conservation features in existing protected areas within the project AEI;
2. Propose a preliminary network of candidate areas for engagement that address ecological representation gaps identified in Phase 1; and
3. Propose a network of candidate areas representing the landscape through a range of scenarios that are built in collaboration with Indigenous Peoples, through government engagement and with other interested stakeholders.

Initial analyses showed that approximately 260,000 ha of additional conservation lands from within the Management Unit were needed to achieve the 10% threshold.

To address this shortfall, Al-Pac is engaging in technical (Marxan) analyses to identify candidate protected areas considering important values such as caribou habitat, multi-species habitat associations, carbon, biodiversity, etc.

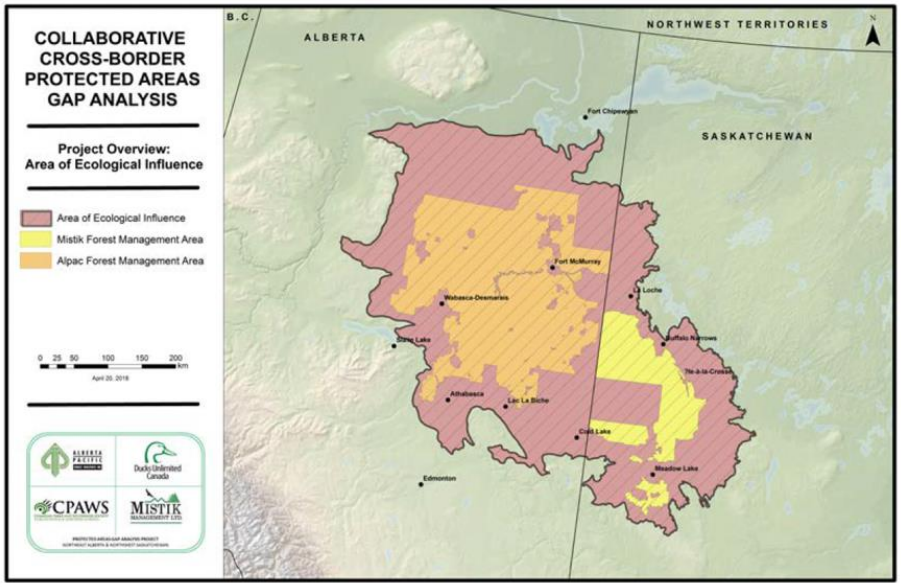


Figure 1Al-Pac and Mistic Forests and the Area of Ecological Influence (source : Al-Pac)

Risk associated with this issue:

The risk is associated primarily with large management units and intensely managed forests. While concern regarding continued FSC subscription exists to some extent in these countries, it was not associated with landscape-level representation in CAN per se. From an overall perspective, risk associated with landscape considerations is local, and moderate in intensity. Nonetheless we did hear concerns in several countries that there is a temptation to allocate poorer-quality lands or lands not suited for development of high-quality forest ecosystems to the CAN instead of protecting ecologically valuable forest ecosystems that play a critical role in the ecosystem or that are poorly protected in the landscape.

Recommendation #4:

FSC should provide guidance regarding the manner in which landscape-level representation should be achieved, and benchmarks associated with appropriate levels of representation (see recommendations #3a and # 3b).

Rationale:

Criterion 6.5 of national standards is generally not prescriptive on how to achieve representativeness. The approach used varies from certificate to certificate and depends on the information available to characterize the certified forest.

In order to set expectations, FSC should provide a possible methodology to be used by certificate holders. For example, this could be a guidance document for the implementation of criterion 6.5. The guidelines could provide an approach to achieving representativeness using the best available information to define the proportion of each ecosystem. It could also provide acceptable thresholds for representativeness of each ecosystem in the CAN.

4.2.2 10% Threshold for medium/large forests

Scope: Countries where this concern was raised are shaded.

AFRICA	ASIA-PACIFIC	CIS-COUNTRIES	EUROPE		LATIN AMERICA	NORTH AMERICA
Cameroon	Australia	Russia	Bulgaria	Sweden	Mexico	Canada
Gabon	Indonesia	Ukraine	Portugal		Uruguay	United States

Apart from the focus countries, this concern has been reported for New Zealand and Peru.

Context for countries where this is not an issue:

In countries where this is not an issue, there is sufficient set-asides because of legal requirements, because there is an abundance of high ecological value ecosystems where forest harvesting is not possible or due to the availability of forests to be set aside without significantly affecting the economic aspects of forest management.

In Gabon, the 10% threshold has been identified as a challenge but not a concern that would prevent certification for the new certificates as the requirement goes beyond the regulatory framework whereas it is not an issue for long-established certificate holders.

Context in countries where this is an issue:

Canada: Concern was noted that the 10% requirement was a disincentive for certification. However, this seems to be mostly the case in western Canada; there does not seem to be the same level of reluctance/resistance in central and eastern Canada to 6.5 per se. However, there is a more widespread concern that Criterion 6.5 may have a cumulative impact on land potentially removed from active forest management in concert with protection associated with IFLs, ICLs and woodland caribou protection measures.

Australia: Plantation-driven forestry is very common, and the MU are often largely planted, creating economic challenges in achieving 10% CAN. Experts interviewed expressed considerable concern that 10% may be a disincentive, some plantation owners have purchased or leased land to set aside to comply with the requirement, but no definitive examples were presented where the threshold dissuaded companies from seeking certification.

Bulgaria: There was some disagreement with the 10% threshold from the forest industry, particularly restrictions on harvesting in RSAs.

Other countries: In Peru, the IGI version 5 standard development has not yet been completed. One of the problems encountered by the SDG is the threshold of 10% protection required by Criterion 6.5 is too high according to the economic members. Concessions in Peru exclude non-exploitable areas and royalties are paid by companies on the totality of the MU. Forest companies maintain that the costs to be paid for the conservation areas in certified MU are prohibitive.

The revised NFSS of New Zealand was not yet published at the time of this study, but standard development was completed, and the last draft approved by PSU. The 10% threshold is not believed to be an appropriate approach to ensuring ecological value of some portion of certified land. The requirement for 10% is a threat to certification given the nature of forest management in New Zealand that is almost exclusively through plantations.

Risk associated with this issue:

The issues related to the 10% minimum threshold on medium/large natural forests or plantations is limited to countries or certificate holders for whom other potential impacts compound those potentially associated with the threshold requirement.

The global risk of CHs abandoning certification because of the criterion 6.5 10% minimum threshold for medium/large concessions is moderate[27]. Reducing the 10% threshold for large forests is a higher risk as this is an important measure for conservation organizations, and this requirement distinguishes FSC from other certifications.

Recommendation #5:

Keep 10% minimum threshold for medium and large forests.

Rationale:

We heard from most interviewees that the Criterion 6.5 IGIs should not be revised for medium and large forests. While several were not enamored with the IGIs, the process of revising them, and the subsequent review and re-writing of the country's indicators was predicted to be time-consuming, likely fraught with challenges, confusing and potentially troublesome for certificate holders. Further there is no certainty that revised IGIs would solve the issues that individual countries face in developing and maintaining ecologically appropriate suites of Representative Sample Areas and Conservation Area Networks. Such a revision could weaken the perception of FSC if it were to be viewed as lacking stability and capitulating to economic interests. In addition, almost all forest managers in medium or large forests believed that they had found ways to work within the IGIs, and specifically, the 10% requirement. Furthermore, if the Guidance provided in Recommendation #2 proves useful, it may provide means for innovative application of the threshold that addresses some of the concerns identified by certificate holders of large forests.

4.2.3 10% Threshold for small holders (less than 50 ha)

Scope: Countries where this concern was raised are shaded.

AFRICA	ASIA-PACIFIC	CIS-COUNTRIES	EUROPE		LATIN AMERICA	NORTH AMERICA
Cameroon	Australia	Russia	Bulgaria	Sweden	Mexico	Canada
Gabon	Indonesia	Ukraine	Portugal		Uruguay	United States

Context for countries where this is not an issue:

Gabon and Cameroon: At the moment there are no FSC certified smallholder forests in these countries. However, the NFSS of both countries distinguish between large and smallholders. The issues related to the 10% threshold are also relevant for smallholders in Gabon and Cameroon, as it was perceived to be too prescriptive. One expert suggested that smallholders should be able to provide documentation on why they aren't able to reach the 10%, and that would be sufficient to be considered in compliance (as is the case in Portugal). With the 10% threshold requirement, Criterion 6.5 is potentially adding on to the already

[27] See section 2.5 on Risk evaluation

existing barriers (i.e., legality, technical knowledge, financial capacity, access to market) that exist in these countries for smallholders.

Bulgaria: There are no very small (less than 50 ha) certified forests. There are however certified cooperatives where shareholders of the cooperative have a share in the forest. These forests are of sufficient size to allow the protection of the 10%.

Russia & Ukraine: With the ongoing conflict in Ukraine and Russia we have had very little information from these countries and none from the smallholders.

Context in countries where this is an issue:

Indonesia:

In Indonesia most smallholders own very small lots - on average between 0.25 and 1.0 ha[28]. Flat areas tend to be used for agriculture commodities and therefore only a small portion of the lots have has tree cover. Due to the small size of the forested area on individual lots, it is less relevant to protect 10% of each individual certified wood lots.

The small woodlot owners are often in poor economic conditions and trees are cut down when income is needed by the owner. The financial impact is significant for the owner who wishes to protect 10% of his land. Our field visits show that the 10% threshold is either not reached or is rather freely interpreted by CHs and CBs in such a way as to be attainable e.g., shifting conservation areas on a five-year cycle.

On Java, forests have been cleared since the 18th century. In the National Standard for Smallholders in Indonesia[29] it states "*Indicators in Criterion 6.5 are applicable ONLY IF there are native ecosystems present in the smallholder's forest or in the smallholder's location, OR if opportunities exist to restore areas in the smallholder's forest or in the smallholder's location to more natural conditions."* In the interpretation of some of the experts consulted as part of this study, if native ecosystems do not exist in the smallholder's forest or the smallholder's location, the 10% threshold is not applicable.

Australia: Concerns exist that the threshold is a disincentive to maintain or achieve certification for small holders. The owners of small plantations do not consider it economically feasible or worthwhile to set aside areas.

Mexico, Uruguay, Portugal & Sweden: This issue was raised as a broader concern within small private properties in most countries of Latin America and in European countries. In these regions smallholders are typically part of group certificates and they can protect 10% of the whole certified area[30] but it would not be possible if each individual forest needed to achieve the 10% protection. The problem is more acute when it comes to small private plantations that have required investment and where it is more difficult to find areas to protect. When 10% protection is not possible on the certified woodlot, one solution is to purchase a forest lot to restore and protect. However, private forests are often in fragmented landscapes dominated by agricultural lands where there are few lands available to purchase for the purpose of restoration or protection. \

Canada & US: The IGI v5 standard applicable to smallholder forests is not yet in effect in both countries. This was, however, raised as a potential concern if each individual forest needed to achieve the 10%.

[28] Kurniawan et al. (2020): Challenges of private forests management in Cluwak sub-district, Pati regency, Indonesia. ICENIS
[29] FSC-STD-RAP-IDN-01-2022
[30] as described in INT-STD-01-001_09 and in FSC-STD-30-005 V(2-0) (effective since March 2021)

When the smallholder standard is in effect in Canada and US the situation will be likely similar to what was described above for Mexico, Uruguay, Portugal and Sweden.

Other countries:

An experienced auditor could give us some insight to the issues related to the 10% threshold for smallholders in Southeast Asia, mainly Thailand. The main issue with Criterion 6.5 is that the smallholders simply do not have 10% to set aside on their lands. Another possibility is to seek areas externally to comply with the requirement, which in turn raises other questions in relation to management obligations and to environmental benefits of such practices.

In China, strong regional differences in the capability of smallholders to achieve the 10% minimum threshold exists. While in some regions small holders are able to set aside up to 20%, in other regions it is impossible to fulfill the requirement. Because the threshold is a potential barrier to accessing certification, particularly for smallholders, a pilot project was conducted to test four alternatives for smallholders to meet the requirements of Criterion 6.5[31].

The following scenarios were tested:

1. Additional land included in certificates (where available, include in the group certification adjacent management units (MU) prioritizing conservation)
2. Additional land following FSC guidance, but not included (where appropriate, provide service to local conservation area, to bring additional strength to its management)
3. Payment to compensate for ES (Where possible, provide financial compensation to certify Ecosystem Services (ES) from MU within similar ecosystem where such service is bountiful)
4. Where none of the above was available and accessible, an exemption is granted.

The five participants started with different scenarios, and in the end, three of them chose Scenario 1 and encountered no major challenges. Scenario 2 was chosen by two participants, one of them shifted to Scenario 1 during the pilot, while the other one was suspended due to false claims. One participant chose Scenario 3 and stayed with it until the end of the pilot test, but it was challenging to implement (many field visits, trying to collect data, establishing a baseline and defining methodologies).

The pilot test in China indicates that the simplest approach is to include areas that already have a conservation purpose in the certificate. However, this approach does not increase conservation within MUs under management.

Risk associated with this issue:

Based on the results obtained in the focus countries, we can assume that the problem related to reaching the 10% in smallholder forests is generalized in the world and, obviously, is more serious in countries where there are more private forests as they are smaller in size and are frequently plantations. There is a high global risk that it can be a barrier to certification even if the problem is somewhat mitigated by achieving the 10% threshold at group level.

[31] FSC (2021) Final Report on the Chinese NFSS (6.5) Pilot Test

Recommendation #6:

Provide guidance that addresses the use of the 10% threshold (for example by making the minimum threshold of 10% optional for small holders)

The guidance could permit that under a certain size of individually certified forests (e.g., 50 ha), the 10% threshold be replaced by alternate approaches that promote conservation. National SDGs should be empowered to identify the size threshold below which the 10% minimum need not apply.

Rationale:

As is described above, there are shared issues related to addressing RSA and CAN requirements in small forests across many (or most) countries. It was broadly recognized that securing 10% RSAs/CAN in small holdings is frequently impractical and presents a barrier to certification. Nonetheless small holders do have responsibilities for broader aspects of forest management. FSC should provide examples of alternative options to promote conservation in small holder certificates and group certificates. Several possible options were identified as part of this study through the consulted experts and within the reviewed literature. For example[32]:

- Adopt a continuous improvement to the threshold (not tested/approved yet; only applicable for those smallholders who will eventually have enough area for the 10%)
- Reduce the threshold of SLIMF (e.g., NFSS of Bulgaria only demands 5% without human interference for FMU <50ha);
- Small forests that are certified under a group certificate with larger MUs could be permitted to meet the 10% requirement at the group level (SLIMF and large MUs) and not in individual forests[33];
- Compensation mechanisms for conservation outside the smallholder forest or outside the group i.e., in Sweden, a group certificate with many members pays compensation to its members who agree to set-aside areas to meet the requirements of the CAN
- Include financial incentives to protect portions of smallholder private lands through partnership with governments for example by removing property taxes;
- Through direct compensation by FSC by creating a compensation mechanism for small holder conservation; or
- Create incentives for Ecosystem Services. It was not a success in a pilot project in China, but that doesn't mean it will be a failure everywhere, so it's appropriate to keep this option open.

4.2.4 Representativeness of Native Ecosystems Inside the CAN/RSA

Scope: Countries where this concern was raised are shaded.

AFRICA	ASIA-PACIFIC	CIS-COUNTRIES	EUROPE		LATIN AMERICA	NORTH AMERICA
Cameroon	Australia	Russia	Bulgaria	Sweden	Mexico	Canada
Gabon	Indonesia	Ukraine	Portugal		Uruguay	United States

[32] See also *FSC Sweden (Nov 2022) Problems and solutions on compliance for FSC certified smallholders under Criterion 6.5* and FSC (2021) Final Report on the Chinese NFSS (6.5) Pilot Test

[33] as described in INT-STD-01-001_09 and in FSC-STD-30-005 V(2-0) (effective since March 2021)

Although this concern has not been raised everywhere, we heard in our interviews that it is assumed that in all countries with FSC certified forests, companies seek to reduce the impact of the 10% protection and therefore may look for opportunities to establish the CAN in less productive forest stands dominated by less marketable species, non-forest lands and areas already protected by regulation. This approach likely skews representation away from ecologically important ecosystems that may also be economically valuable.

Context for countries where this is not an issue:

The issue can be managed more easily in countries where forest data is of sufficient quality to know the variability of the ecosystems in order to establish a representative CAN network.

Context in countries where this is an issue:

The issue appears to be greater in tropical areas where the forest is more diverse and less well-known. This issue was mentioned in the Congo Basin, but based on our previous experiences, we believe that we would likely have had a similar response if we had targeted the Amazon countries.

We can expect that this can also be an issue in non-tropical countries e.g., where mature/old-growth forests are the most economically valuable.

An unpublished confidential report[34] on the effectiveness of FSC set-aside areas for biodiversity conservation, found that, generally, the RSA concept was too theoretical and that in practice there is a tendency to use the HCV concept to identify RSA/CAN. This trend was also noted for some countries during our assessment (e.g., in Gabon, Criterion 6.5. verifiers refer to HCV). This is not strictly consistent with the representativeness requirement of Criterion 6.5. It indicates that the RSA concept is not fully understood (mainly by CHs but also within SDGs).

In Australia, most of the certified area is plantation, which contains no, or little RSA lands. In those circumstances, options for protecting RSAs either rely on protection of riparian areas, restoration of degraded lands that exist with the forest, or expanding of the forest boundaries by purchasing or leasing additional RSAs to be added to the certified area.

Risk associated with this issue:

The main risk associated with a lack of representativeness of CAN is reducing the ecological benefits desired by the standard. Although this concern may be greater in some countries (e.g., tropical countries), we believe that this represents a high global risk.

Recommendation #7:

This is addressed through recommendation #2 by providing additional guidance regarding RSAs.

[34] Unpublished confidential report 2022.

4.2.5 Restoration in CAN/RSA

Scope: Countries where this concern was raised are shaded.

AFRICA	ASIA-PACIFIC	CIS-COUNTRIES	EUROPE		LATIN AMERICA	NORTH AMERICA
Cameroon	Australia	Russia	Bulgaria	Sweden	Mexico	Canada
Gabon	Indonesia	Ukraine	Portugal		Uruguay	United States

Apart from focus countries this concern has been reported for Ecuador.

Context for countries where this is not an issue:

In most countries where this is not an issue, restoration is not needed because CAN is established in undisturbed natural forest.

Context in countries where this is an issue:

Indonesia: This issue was raised for Java. On Java, forests have been cleared since the 18th century. Forest cover in Java is mostly Teak and Mahogany. Teak is not native and some people with whom we spoke assert that the native composition of stands with mahogany is not known. If this is so, it would not be possible to restore a forest cover with a natural composition.

Australia: A high proportion of certified area is plantation in Australia. Restoration of degraded areas may be the only way to address the 10% threshold as forest managers are reluctant to convert the plantation to natural ecosystems.

United States: The appropriate interpretation of 'restoration' was debated during standard development and was noted to be a focus of some concerns of the economic chamber.

Other countries: An SDG member from Ecuador commented that the FSC definition of restoration was too broad and should be clarified. For example, can the restoration of aquatic ecosystems count? What are acceptable biodiversity goals and timelines of restoration? Does restoration need to be active (i.e. recreating ecosystem with industrial equipment), or can it be passive (i.e. let nature restore itself)?

Risk associated with this issue:

This impact is primarily in countries where conservation areas must be established in areas that require restoration. Overall, there seem to be few certified forests where RSA/CAN in natural undisturbed ecosystems are insufficient to meet the 10% threshold and consequently there is little need to restore conservation areas. Therefore, we consider this issue to have a low impact overall. However, if some CAN areas are not adequately restored this may reduce the ecological benefits of Criterion 6.5 and reduce the credibility of the standard.

Recommendation #8:

FSC should provide guidance on considerations that should be taken into account in planning and implementing restoration.

4.2.6 Cost of criterion 6.5 for medium/large forests

Scope: Countries where this concern was raised are shaded.

AFRICA	ASIA-PACIFIC	CIS-COUNTRIES	EUROPE		LATIN AMERICA	NORTH AMERICA
Cameroon	Australia	Russia	Bulgaria	Sweden	Mexico	Canada
Gabon	Indonesia	Ukraine	Portugal		Uruguay	United States

Cost was not raised as a concern for large forests in discussions and communications with experts from Portugal, Sweden, Mexico, Uruguay, Gabon, Cameroon, Indonesia, Ukraine and Russia. However, we recognize that cost or economic viability of maintaining or achieving certification was frequently an underlying concern implicitly expressed through identification of other issues.

We have not dealt with small holders in this section since for all of them reaching 10% represents a cost and an important issue for forest owners who depend on their land for their livelihood. This point is already clearly addressed in the section 4.2.3.

Context for countries where this is not an issue:

The main cost of Criterion 6.5 is related to the loss of volumes from the area protected, however, in most countries the CAN is in areas that would not be harvested regardless (i.e., designated protected area, sensitive area protected by regulation, inoperable area, non productive stands, etc.). Not being able to build a road can also result in additional costs for building an access road that bypasses the CAN. Other costs may be related to monitoring the status of the CAN and protecting it from poachers; however, these costs are included in the management of the concession and are generally not significant.

Context in countries where this is an issue:

This is an issue in Canada (primarily western Canada), and United States. It is also a concern in Australia because the restoration of planted areas to CAN would be costly.

Risk associated with this issue:

This represents a high global risk as the price of certification reduces the number of companies that have the financial capacity to retain certified status. However, if we consider only the companies that are already certified, there is a low local risk that this issue leads to the abandonment of certification by CHs.

Recommendation #9:

FSC should undertake (or review existing) cost/benefit analyses associated with the implementation by certificate holders of the CAN requirements and identify regional opportunities (marketing, funding, collaborations with conservation and park management agencies, etc.) to improve benefits relative to cost. Assess whether the benefits of CAN are adequately communicated in FSC materials.

Rationale:

Although CANs represent a cost for many companies, this cost can be offset by the positive benefits of certification, namely the improvement of a company's reputation because it is certified. FSC should communicate the benefits of conservation areas within FSC certified forests (e.g., carbon storage, supporting biodiversity, etc.).

4.2.7 Data availability and capacity for auditing Criterion 6.5

Scope: This concern was raised in Gabon and Cameroon; it was raised as a global risk mostly for tropical forests.

AFRICA	ASIA-PACIFIC	CIS-COUNTRIES	EUROPE		LATIN AMERICA	NORTH AMERICA
Cameroon	Australia	Russia	Bulgaria	Sweden	Mexico	Canada
Gabon	Indonesia	Ukraine	Portugal		Uruguay	United States

Context for countries where this is not an issue:

Sufficient information is available to auditors and companies to adequately assess the proportion and the representativeness of the CAN within certified forests. For example, in Bulgaria, the data about the areas of each forest and non-forest ecosystem as well as of each forest stand are available in Forest Management Plans. The SDG has developed a RSA decision-making table helping the certificate holders identify the area of each ecosystem to be designated as RSA and select the forest compartments to be set aside as RSA. This table is also used by the auditors to check the areas and representativeness.

Context in countries where this is an issue:

This concern was raised by a small number of experts interviewed including experienced FSC auditors. The problem raised is the lack of accurate forest inventory maps and maps of the ecosystem composition in order to design and delineate an optimal CAN. This increases the uncertainty regarding the representativeness of the CAN. This problem is particularly acute in tropical countries where forest data is typically of lower quality or where the ecosystems are very diverse.

Risk associated with this issue:

There is a low local risk that this issue leads to the abandonment of certification by CHs.

Recommendation #10:

FSC should work with Certification Bodies to improve auditing of Criterion 6.5

Rationale:

In the interviews we conducted, we heard some concerns about the nature and type of information collected by auditors typically focus on managed areas where activities occur. Set-asides are seen as less relevant to visit because they are not disturbed and may also be inaccessible. This means that the quality of the environments that are protected are less verified. Auditors could obtain the geolocation of the RSA/CAN from companies to confirm their presence on recent satellite images.

4.2.8 Concerns about harvesting occurring in CAN

Scope: This concern was raised by a small number of experts but as a global concern.

AFRICA	ASIA-PACIFIC	CIS-COUNTRIES	EUROPE		LATIN AMERICA	NORTH AMERICA
Cameroon	Australia	Russia	Bulgaria	Sweden	Mexico	Canada
Gabon	Indonesia	Ukraine	Portugal		Uruguay	United States

Context in countries where this is an issue:

This concern was raised by a small number of experts interviewed but is applicable to all countries. There are 2 parts to this concern.

1) Forest management including harvesting within conservation areas is allowed in some circumstances provided that it contributes to maintenance and enhancement of respective conservation values. Some experts point out that this can be interpreted as permission to do business as usual in CAN. For example, in certified forests of the Congo Basin countries forest management may have a low impact on forest cover and forest diversity.
2) After a rotation, it is arguably acceptable to replace unharvested portions of the CAN with areas that were harvested in the previous rotation if it is justified to the CBs and approved by them (INT-STD-01-001_12**,** interpretations of the normative framework, 6 May 2022). In many tropical countries, natural forest rotations can be around 25 to 35 years, harvesting in the CAN at the beginning of the next rotation may undermine the long-term benefits of Criterion 6.5 because even when forest management does not reduce forest cover it often simplifies forest composition and structure, for example, by reducing the abundance of some tree species or by reducing the age of stands.

These concerns are comparable to those expressed regarding extended-rotation forestry in Canada, which has been suggested as a means of reducing the economic and wood-supply impact of Criterion 6.5 while attempting to maintain ecological benefits of a CAN.

Risk associated with this issue:

In general, harvesting is not conducted in the CAN and most forest managers do not plan for shifting the CAN after rotations. As a consequence, this has likely had very little impact. Nonetheless, these elements are perceived as loopholes that have a moderate global risk of reducing the credibility of FSC.

Recommendation #11:

The guidance developed by FSC (see recommendation #2) should explicitly identify long-term objectives to be addressed through the implementation of the indicators of Criterion 6.5.

Rationale:

There is concern that the long-term objective of the RSA/CAN is unclear in the IGIs, in spite of the definitions provided in the FSC glossary. This could undermine the ecological benefits of Criterion 6.5.

4.3 Description of ecological outcomes achieved through implementation of Criterion 6.5

According to an unpublished confidential report[35], stakeholders perceive C6.5 as one of the most important Criteria for biodiversity conservation (along with 6.3, 6.4, 6.6, 9.1, 9.3). However, as the implementation of NFSS developed with IGI v5 was recent, and additionally varying between countries, it is not feasible to draw conclusions on the actual effectiveness of Criterion 6.5 for conservation benefits. Correlations with other Criteria and Principles are also very likely to occur (i.e., with C6.3, C6.4, C6.6, P9), and they may be redundant in parts. However, we recognize that the ecological benefits of these Criteria can be, and often are, additive. So, for example the requirements of Criterion 6.5 related to Conservation Area Networks undoubtedly supplement or buttress protections of species at risk identified in Criterion 6.4 and High Conservation Values, identified in Principle 9. A recent Master's degree thesis showed that the Criterion 6.5 requirements associated with HCVs (P9) are an important mechanism for maintaining and improving biodiversity.[36]

10 % Minimum Threshold

Globally, the 10% threshold was perceived by most of the interviewed experts as the overall most important indicator within Criterion 6.5 regarding its potential for conservation gains. This is in line with the results of WWF. Apart from the 10% area threshold, the study could not identify any conservation benefits related to RSAs.

Areas set aside under Criterion 6.5 have the potential to support climate change mitigation, as they promote carbon storage. Ontario Nature found that 147 conservation lands (in the CAN of FSC-certified forests), covering over one million hectares in Ontario, Canada, currently store 400 million tons of carbon[37].

In most of our interviews, the threshold of 10% was rather perceived as target or maximum instead of a minimum as intended by the Criterion. Clarification of the threshold nature of the 10% has the potential to increase conservation benefits (see section 4.1.3 on the conceptual diagram and recommendations #3a and #3b).

FSC and Legislation

In many countries, including Congo, Indonesia, Canada, the United States, and Sweden, much of this the 10% already falls within the protection mandated by national regulations. The protection of these sensitive and representative areas required by law (e.g., waterways, slopes), is a fundamental contribution to biodiversity. However, experience shows that in some countries, the laws are often not implemented strictly enough, so according to the experts interviewed, better implementation can actually be observed in certified forests. One reason cited for this is the verification through audits.

Depending on the countries' circumstances, natural forest/ non-productive forest/ conservation zones may be generally protected and/ or excluded from Forest Management Units (e.g, Uruguay, Sweden, New Zealand, Gabon). As conservation lands are often selected from those areas, it seems considerably more difficult to identify an adequate amount of representative areas within the respective forest management

[35] Unpublished confidential report (2022)
[36] Varela (2020): FSC Forest Certification as a Conservation Tool in Portugal: Impacts and Potentialities. Master Thesis. University of Padua - Department Land and Agro-Forestry Systems. MEDFOR - Mediterranean Forestry and Natural Resources Management
[37] Smith (2022): Evaluating Carbon Storage in Forest Stewardship Council Designated Conservation Lands. Ontario Nature Blog

units. In such contexts, although the 10% threshold within forest management units can be reached, there is a higher risk for the quality of the selected areas to be lower. Therefore, in some cases, there is the indication for a more flexible and benefit-oriented approach, adapted to the respective national context, that might lead to more effective ecological outcomes with higher quality conservation lands (see section 4.1.1 and recommendation #1). Such an approach is consistent with a landscape perspective in which the contribution of protected or special areas outside of the management unit is used to temper or reconcile the selection of RSAs and CAN lands inside management units.

Representativeness

Concerns were raised that Criterion 6.5 leaves too much space for subjectivity on the representativeness of the sample areas. There is a tendency of certificate holders to choose un-exploitable areas, that are not necessarily proven to be of high-quality in terms of biodiversity. This is true in the Congo-Basin, however, large wildlife seems to be much better maintained in certified forest in this region[38]. This is probably not only caused by conservation areas but it highlights that FSC requirements can make a difference in maintaining wildlife populations and therefore healthier ecosystems.

Restoration

In the case of the restoration, we encountered a wide range of different interpretations and implementations of the concept, depending on who we were talking to. Generally, the potential environmental benefits of restoration are high, if implemented meaningfully. At the same time, they require a higher amount of effort and investment from the CH. In Australia, it has been questioned whether restoration can actually achieve good quality ecological outcomes.

A positive example for restoration benefits is South Africa. The country has many plantations and a long history of certification, with first certificates issued in 1998. Today about 85% of plantations are certified. Within 20 years, open areas such as natural forests, wetlands, grasslands, and fynbos have increased significantly due to several of the standard's requirements. According to our interviewee, the 10% threshold played a key role. Restoration of degraded lands (e.g., plantations and cattle ranches) was also part of this process, and the management of the protected areas is deeply integrated into plantation management.

Permanent Protection

Some countries (e.g., Canada, Sweden) specifically include the goal of permanent protection to their standard. In Canada, certificate holders are required to work within their spheres of influence to move the designated conservation lands towards permanent formal protection. Because, in Canada's tenure system parks and other types of conservation lands are excluded from tenures, but are often enveloped by Management Units officially protected areas contribute to the 10% threshold even if they are not included in the management plan. These lands may have been removed from the tenured area after the park or conservation area was established, or may never have been part of the tenure if the protected area was established before tenure in the surrounding area was awarded. In Ontario, Canada, Criterion 6.5 has the potential to increase the province's permanent protection areas by approximately 1% (Ontario Nature 2021).

In contrast to this, a company in the Republic of Congo wishes to cede a conservation area that is currently contained within the certified forest to a National Park. However, at this time the company has not received confirmation from their CB and FSC that this area can continue to contribute to the percentage of protection

[38] Unpublished confidential report (2022)

of the certified forest once it has been transferred. If the area cannot contribute to the protection percentage, it would be a disincentive to transfer conservation areas to official protection.

To allow for the creation of national protected areas, which would be an integral part of the CAN is one of the recommendations to strengthen the concept of RSAs/CAN resulting from a confidential unpublished study on the effectiveness of FSC set-aside areas for biodiversity conservation[39].

Smallholders

In several of our conversations with country experts, concerns were raised regarding the effectiveness of Criterion 6.5 for conservation benefits in the case of smallholders. The selected areas are likely very small and scattered, which makes their effectiveness in achieving conservation gains questionable.
An important benefit of certification for small holders is building the awareness of forest owners towards conservation. This is only possible if the standards are achievable in the context of land use by the owners, especially for subsistence needs. It is therefore relevant to adapt the requirements of the standards to the national context of the smallholders. Several options are identified in our report that would allow small holders to contribute to conservation according to their means (see section 4.2.3 and recommendation # 6).

Other benefits

Other benefits referred to by the interviewees include community benefits, which are often linked to natural forests, tourism, and mobilization of funding and personnel.

[39] Unpublished confidential report (2022)

5 Conclusion

As part of this study, through numerous discussions, interviews and research efforts, it became most apparent that Criterion 6.5 is a fundamental component, and a defining feature, of FSC's Standards. This perspective is held by most people with whom we spoke – Standard Development Group members, Certificate Holders, Auditors, Certification Body representatives, and Stakeholder Groups. This study also confirmed that there are circumstances in which meeting the requirements of the Criterion is challenging, from ecological, economic, and social perspectives. Important objectives are frequently difficult to achieve and that is the case, in some circumstances with Criterion 6.5.

Not surprisingly, this study confirmed that addressing the 10% threshold was the most challenging aspect of the Criterion, although it was not problematic in management scenarios in all countries. This was due both to the natural circumstances of some countries, which are blessed with large and abundant forests, and to the thoughtfulness devoted to addressing the 10% requirement by national Standard Development Groups and certificate holders. This study recommends retaining the 10% threshold, and most of those with whom we spoke also advocate retaining the threshold requirement. There are significant caveats to this, however. Although there was a consensus that retaining the 10% requirement was appropriate, the manner in which it is being implemented implies that this acceptance generally refers to its use as a target rather than a minimum to be exceeded when ecological circumstances necessitate. Another caveat to the endorsement of the 10% threshold relates to its use in small forests where logic defies the utility of setting 10% of very small amounts of land. Organizational structures (i.e. group certificates) may provide a mechanism for dealing with this in some circumstances, but they are not always practical and likely do not lead to the desired positive outcomes. This report recommends making the 10% threshold optional for small holders when it is more appropriate to implement other approaches that would lead to a positive outcome. In total, the report provides 11 high-level recommendations for FSC to improve the standard development and implementation of the Criterion 6.5.

ANNEX A CRITERION 6.5 IN THE IGIs AND THE NATIONAL STANDARDS OF SAMPLE COUNTRIES

INTERNATIONAL GENERIC INDICATORS (IGI)

6.5 ***The Organization**** ***shall**** **identify and protect representative sample areas of** ***native ecosystems**** **and/or** ***restore**** **them to more** ***natural conditions****. Where representative** ***sample areas**** **do not exist or are insufficient,** ***The Organization**** ***shall**** ***restore**** **a proportion of the** ***Management Unit**** **to more** ***natural conditions****. The size of the areas and the measures taken for their protection or restoration, including within plantations, shall* be proportionate to the** ***conservation**** **status and value of the** ***ecosystems**** **at the** ***landscape**** **level, and the** ***scale, intensity and risk**** **of management activities. (C6.4 and 10.5 P&C V4 and Motion 2014#7)**

INSTRUCTIONS FOR STANDARD DEVELOPERS: Standard Developers shall* identify the methods for identifying Representative Sample Areas*. Representative Sample Areas* perform multiple functions, including:

- Representing the environmental values* that exist in native ecosystems* and thus serve as a reference for environmental values* and ecosystem services* within the Management Unit*. In order to use Representative Sample Areas* as references for all of the ecosystems* that could potentially be present in the Management Unit*, for the purposes of 6.1.1, it may be necessary to identify Representative Sample Areas* outside of the Management Unit*. This may be the case when dealing with Management Units* comprised mainly of plantations.

- Informing forest* management, including regeneration, within the Management Unit* in order to maintain or enhance environmental values*.

- Forming part of the Conservation Areas Network* within the Management Unit*. In order to protect and conserve environmental values*, it may be necessary to designate and restore* Representative Sample Areas* within the Management Unit*. Protection Areas*, Conservation zones*, Representative Sample Areas* and High Conservation Value Areas* may overlap spatially where they meet the same criteria to form the Conservation Area Network*. Please refer to Annex D.

Please refer to Annex D for additional information on how Conservation Area Networks* shall* be defined.

The Conservation Area Network* shall* be large enough to allow natural processes to take place in the absence of any direct human interference. Where Intact Forest Landscapes* occur, they should contribute to the Conservation Area Network*. Since 2011, the FSC Policy and Standards Committee, on behalf of the FSC Board of Directors, have consistently applied a minimum threshold of 10% of the Management Unit* to all FSC National Standards through the national standards approval process. This threshold is written in FSC Forest Stewardship Standards: structure, content and suggested indicators FSC-GUI-60-004 V1-0 at Criterion* 6.2. This document has been the key reference for Standard Development Groups since it was approved in 2011.

6.5.1 Best Available Information* is used to identify native ecosystems* that exist, or would exist under natural conditions*, within the Management Unit *.

6.5.2 Representative Sample Areas* of native ecosystems* are protected, where they exist.

6.5.3 Where Representative Sample Areas* do not exist, or where existing sample areas inadequately represent native ecosystems*, or are otherwise insufficient, a proportion of the Management Unit* is restored* to more natural conditions*.

6.5.4 The size of the Representative Sample Areas* and/or restoration* areas is proportionate to the conservation* status and value of the ecosystems* at the landscape* level, the size of the Management Unit* and the intensity* of forest* management.

6.5.5 Representative Sample Areas* in combination with other components of the conservation areas network* comprise a minimum 10% area of the Management Unit*.

AFRICA

CAMEROON

Effective since 02.2020

6.5 *The Organization shall identify and protect representative *sample areas** of *native ecosystems** and/or *restore** them to more *natural conditions**. Where representative *sample areas** do not exist or are insufficient, *The Organization** shall *restore** a proportion of the *Management Unit** to more *natural conditions**. The size of the areas and the measures taken for their *protection** or *restoration**, including within *plantations**, shall be proportionate to the *conservation** status and value of the *ecosystems** at the *landscape** level, and the *scale, intensity and risk** of management activities.**

6.5.1L Best Available Information* is used to identify native ecosystems* that exist, or would exist under natural conditions*, within the Management Unit*.

Verifiers: HCV assessment report, - Environmental policies and procedures.

6.5.1S *The Organization** collaborates with relevant stakeholders* to identify and map out representative samples of unique ecosystems* in their concessions.

6.5.2L Representative Sample Areas* of native ecosystems* are protected, where they exist.

Verifiers: HCV monitoring report.

6.5.2S *The Organization** implements measures to protect the representative samples of unique ecosystems* identified in 6.5.1.

6.5.3L Where Representative Sample Areas* do not exist, or where existing sample areas inadequately represent native ecosystems*, or are otherwise insufficient, a proportion of the Management Unit* is restored*.

6.5.4L The size of the Representative Sample Areas* and/or restoration* areas is proportionate to the conservation* status and value of the ecosystems* at the landscape* level, the size of the Management Unit* and the intensity* of forest* management.

6.5.5LS Representative Sample Areas* in combination with other components of the conservation areas network* comprise a minimum 10% area of the Management Unit*.

Verifiers: HCV monitoring report, Management plan*.

GABON

Effective since: 02.2020

6.5 *The Organization shall identify and protect representative *sample areas** of *native ecosystems** and/or *restore** them to more *natural conditions**. Where representative *sample areas** do not exist or are insufficient, *The Organization** shall *restore** a proportion of the *Management Unit** to more *natural conditions**. The size of the areas and the measures taken for their *protection** or *restoration**, including within *plantations**, shall be proportionate to the *conservation** status and value of the *ecosystems** at the *landscape** level, and the *scale, intensity and risk** of management activities.**

6.5.1L Best available information* is used to identify and map the representative ecosystems of the Management Unit*.

Verifiers: Maps of the various representative ecosystems of the MU; Survey reports of the situation prior to forestry operations (wildlife inventory, inventory of flora), HCV identification report.

6.5.2LS Representative Sample Areas* of native ecosystems* are included in the conservation area network* and protected, when they exist in the MU.

Verifiers: Maps of the various representative ecosystems of the MU (L), HCV identification report (L), Simple management plan (S).

6.5.3L The size of the representative sample areas* and/or restoration* areas is proportionate to the conservation* status and value of the ecosystems* at the landscape* level, the size of the Management Unit* and the intensity* of forest* management.

Verifiers: Maps of representative sample areas and/or restoration* areas (protection series and conservation series), Landscape map.

6.5.4LS Representative sample areas* in combination with other components of the conservation areas network* comprise a minimum of 10% of the Management Unit*.

Verifiers: Maps of representative sample areas, protection and conservation areas (LS), Landscape map (L).

ASIA-PACIFIC

AUSTRALIA

Effective since: 01.2018

6.5 *The Organisation *shall** identify and protect representative *sample areas** of *native ecosystems** and/or *restore** them to more *natural conditions**. Where representative *sample areas** do not exist or are insufficient, *The Organisation** *shall** *restore** a proportion of the *Management Unit** to more *natural conditions**. The size of the areas and the measures taken for their *protection** or restoration, including within *plantations**, *shall** be proportionate to the *conservation** status and value of the *ecosystems** at the *landscape** level, and the *scale, intensity and risk** of management activities.**

6.5.1 Best Available Information* is used to identify native ecosystems* that exist within the Management Unit* including assessments of the conservation status* and value of the ecosystems* at the landscape* level.

Verifiers: Documentation of native ecosystems*, including their locations, using maps and other relevant documents., Documentation of the conservation* status of identified native ecosystems*.

Best Available Information* includes, where applicable:

1) Forest ecosystem and vegetation mapping.
2) Bioregional ecosystem protection* targets such as conservation status* and other bioregional assessments by government bodies and/or recognised experts.

L6.5.1 Best Available Information* is used to identify native ecosystems* that exist within the Management Unit*.

Best Available Information* includes, where applicable:

1) Forest ecosystem and vegetation mapping.

6.5.2 The Organisation* shall identify conservation* measures for the protection* and/or restoration* of representative sample areas*. These areas in combination with other components of the conservation area network comprise a minimum of 10% of the Forest Management Unit.

6.5.3 For Management Units* where native forest* harvesting occurs, representative sample areas* of native ecosystems* are protected, where they exist, proportionate to the conservation status* and value of the ecosystems* at the landscape* level, the size of the Management Unit* and the intensity* of forest* management.

INDONESIA

NFSS

Effective since: 01.2020

6.5 *The Organization* shall identify and protect representative sample areas of *native ecosystems** and/or *restore** them to more *natural conditions**. Where representative *sample areas** do not exist or are insufficient, *The Organization* shall* restore** a proportion of the *Management Unit** to more *natural conditions**. The size of the areas and the measures taken for their protection or restoration, including within plantations, *shall** be proportionate to the *conservation** status and value of the *ecosystems** at the *landscape** level, and the *scale, intensity and risk** of management activities.**

6.5.1 Best Available Information* is used to identify native ecosystems* that exist, or would exist under natural conditions* within the Management Unit*.

6.5.2 Representative sample areas* of native ecosystems* are protected, where they exist.

6.5.3 Where Representative sample areas* do not exist, or where existing sample areas inadequately represent native ecosystems*, or are otherwise insufficient, a proportion of the Management Unit* is restored* to more natural conditions*.

6.5.4 The size of the Representative Sample Areas* and/or restoration* areas is proportionate to the conservation* status and value of the ecosystems* at the landscape* level, the size of the Management Unit* and the intensity* of forest* management.

6.5.5 Representative sample areas* in combination with other components of the conservation areas network* comprise a minimum 10% area of the Management Unit*

Nationally-adapted Regional Forest Stewardship Standard for smallholders with Management Units less than 20 ha

Effective since: 01.2022

6.5 *The Organization shall identify and protect representative sample areas of *native ecosystems** and/or *restore** them to more *natural conditions**. Where *Representative Sample Areas** do not exist or are insufficient, *The Organization** shall *restore** a proportion of the *Management Unit** to more *natural conditions**. The size of the areas and the measures taken for their *protection** or *restoration**, including within plantations, *shall** be proportionate to the *conservation** status and value of the *ecosystems** at the *landscape** level, and the *scale, intensity and risk** of management activities.**

6.5.1 The smallholder assists in identifying and protecting representative sample areas of native ecosystems where those exist in the smallholder's forest or in the smallholder's location.

6.5.2 Where representative sample areas of native ecosystems do not exist in the smallholder's forest or the smallholder's location, the smallholder works with others to facilitate regeneration and restoration of suitable areas in the smallholder's location to more natural conditions if suitable areas exist.

Explanatory Note: Restoration of suitable areas in the smallholder's location to more natural conditions if suitable areas exist are required by this indicator. "Suitable areas" include areas with some natural conditions, or some regenerating native species, already

existing nearby the site, and where there is no other land use threatening those conditions. Restoration might involve simply letting those areas recover, or more active intervention to protect and enhance those conditions to support their restoration.

6.5.3 The smallholder, if part of a group entity, to the extent possible, works with others to achieve the target of maintaining a minimum of 10% of the native ecosystems in the smallholder's location in representative sample areas through conservation or restoration of native ecosystems.

Applicability Note: Indicator 6.5.3 is applicable only for those smallholders which operate within group entities.

Explanatory Note: Criterion 6.5 requires all applicants for FSC certification to protect native ecosystems or to restore representative suitable areas to more natural conditions. Native ecosystems include natural forests but also other ecosystems such as wetlands or open grasslands that are native to that location. The three Indicators in Criterion 6.5 are applicable ONLY IF there are native ecosystems present in the smallholder's forest or in the smallholder's location, OR if opportunities exist to restore areas in the smallholder's forest or in the smallholder's location to more natural conditions. If native ecosystems or opportunities for restoration do not exist in the smallholder's forest or the smallholder's location, Criterion 6.5 is not applicable.

The FSC Interpretation Notes INT-STD-01-001_09 and INT-STD-20- 007_45 (found in Interpretations of the Normative Framework, 12th February, 2019) provide interpretation and guidance for this Criterion specific to smallholders. The Interpretation Notes state that the minimum 10% requirement for protection or restoration can be met at a group level, and can be met outside the smallholder's forests (if the management unit is smaller than 50 ha) or outside a group's forests. INT-STD-01-001_09 states that the areas outside the forest must be in the same forest landscape. However, these interpretations and the minimum 10% requirement only apply if native ecosystems or opportunities for restoration exist. Further guidance about the minimum 10% requirement is provided in Principle 6, Annex D, Conservation Area Network Conceptual Diagram on page 41 in the International Generic Indicators (FSC-STD-60-004 V2-0).

The Indicators for smallholders presented here do not require that the smallholder set aside 10% of the smallholder's forest or any of the smallholder's forest. They require the smallholder, or organizations assisting the smallholder, to identify any native ecosystems (including any natural forest) that exist in the smallholder's forest. If any native ecosystems exist, the smallholder is required to achieve a target of protecting a minimum of 10% of those native ecosystems in representative sample areas in, or in the location of, the smallholder's forest. This can be achieved in the smallholder's forest or outside it, but in most circumstances will be outside the smallholder's forest. Where natural ecosystems do not exist, the smallholder is expected to work with or assist others to restore a suitable area in the location to more natural conditions, if those opportunities exist.

The term "smallholder's location" is defined in the Glossary. The term "to the extent possible" in Indicator 6.5.3 will reflect a combination of the extent of native ecosystems available for protection in the location, the potential for restoration when they do not exist,

the capacity of the smallholder, based on the size of the smallholder's forest, and the resources available.

As in other Criteria in Principle 6, it is anticipated that a group manager or an external organization such as an NGO, purchaser, or government agency may assist the smallholder to interpret and meet

CIS-COUNTRIES

RUSSIA

Effective since: 01.2020

6.5 *The Organization shall* identify and protect representative sample areas* of native ecosystems* and/or restore* them to more natural conditions*. Where representative sample areas* do not exist or are insufficient, *The Organization** shall* restore* a proportion of the Management Unit* to more natural conditions*. The size of the areas and the measures taken for their protection or restoration, including within plantations, shall* be proportionate to the conservation* status and value of the ecosystems* at the landscape* level, and the scale, intensity and risk* of management activities.**

6.5.1. Based on Best Available Information*, the list of types of ecosystems* that refer to native ecosystems*, including non-forest ones (wetlands, meadows, etc.) but only for those, in which *The Organization** has management activities, is compiled for the Management Unit*.

Note: *The Organization** may* choose any typological scheme, including forest types according to inventory materials.

6.5.2. Representative sample areas* are identified within each type of forest and non-forest (if applicable) ecosystems*.

Directive: The size of representative sample areas* within each type of forest and non-forest ecosystems* is defined based on their conservation status and value*, as well as risks* of negative consequences*. When choosing Representative Sample Areas* the priority is given to areas in most natural conditions* within each type of native ecosystems*. The preference is also given to larger areas, exception may* be made for rare and non-forest ecosystems*. If the managed area* is small, representative sample areas* of the same type may* be located compactly. If the managed area* is large, it is preferable that the spatial location of representative sample areas* reflects the distribution of native ecosystems* within the managed area*.

6.5.3. Where some native ecosystems* identified according to Indicator* 6.5.1 do not exist or are inadequately represented as Representative Sample Areas*, samples of such ecosystems with the highest potential of restoration to their natural condition* are identified and designated as Representative Sample Areas* as specified in Indicator* 6.5.2.

Note: in practice such areas may* be selected from undermature, middle-aged and young stands composed of native species*, including late-successional tree species, considering possible species succession.

6.5.4. Representative Sample Areas* of native ecosystems* are preserved in natural conditions*.

6.5.5. The total size of Representative Sample Areas* in combination with other components of the conservation areas network* comprise a minimum 10% area of the managed area or areas*.

UKRAINE

Effective since: 01.2019

6.5. *The Organization shall identify and protect representative sample areas of native ecosystems* and/or restore* them to more natural conditions*. Where representative sample areas* do not exist or are insufficient, *The Organization** shall restore* a proportion of the Management Unit* to more natural conditions*. The size of the areas and the measures taken for their protection or restoration, including within plantations, shall be proportionate to the conservation* status and value of the ecosystems* at the landscape* level, and the scale, intensity and risk* of management activities. (C6.4 and 10.5 P&C V4 and Motion 2014#7)**

Note: By default, riparian zones* do not qualify to be included in the Conservation Area Network. Riparian zones* may however be included, if those areas fully meet the definitions of representative sample areas*, conservation zones*, protection areas*, connectivity* as exemplified by wildlife corridors, providing the riparian zones* are not disproportionately represented in the Conservation Area Network*. Riparian zones* "created" or planted for purely functional roles, e.g. erosion control should be excluded.

6.5.1. Best Available Information* is used to identify native ecosystems* that exist, or would exist under natural conditions*, within the Management Unit*.

Verifiers: Forest management plan; Stand-level mensurational description of stands; Provisions (passports) and protection obligations for NRF objects; Passports of genetic reserves; Map of the distribution of forests of *The Organization* by categories; Green book of Ukraine; Files of special research conducted by professionals of *The Organization* and specialized institutions or organizations; Nature chronicles for nature conservation agencies, whose land border on the territory and / or located within the management unit without removal from the permanent user (NNP, biosphere reserves and natural reserves etc.); Survey of professionals; Survey of stakeholders in particular NGOs, representatives of academic and research institutions and organizations, representatives of environmental institutions that are bordering or placed within a management unit (without removal from permanent user).

6.5.2. Representative Sample Areas* of native ecosystems* are protected, where they exist.

Verifiers: Forest management plan; Stand-level mensurational description of stands; Provisions (passports) and protection obligations for NRF objects; Passports of genetic reserves; Map of the distribution of forests of *The Organization* by categories; Green book of Ukraine; List of existing representative sample areas; Survey of professionals; Survey of stakeholders in particular NGOs, representatives of academic and research institutions and organizations, representatives of governmental organizations, including departments of natural resources and environment protection at regional state administrations; Field observations.

6.5.3. *The Organization** does not carry out any management measures within the identified Representative Sample Areas* of native ecosystems*, except the measures aimed to maintain and strengthen the functions of Representative Sample Areas*.

Verifiers: Forest management plan; Stand-level mensurational description of stands; Provisions (passports) and protection obligations for NRF objects; Passports of genetic reserves; List of existing representative sample areas; Map of the distribution of forests of *The Organization* by categories; Survey of professionals; Survey of stakeholders in particular NGOs, representatives of academic and research institutions and organizations, representatives of governmental organizations; Field observations.

6.5.4 Where Representative Sample Areas* do not exist, or where existing sample areas inadequately represent native ecosystems*, or are otherwise insufficient, a proportion of the Management Unit* is restored* to more natural conditions*.

Verifiers: Forest management plan; Stand-level mensurational description of stands; Provisions (passports) and protection obligations for NRF objects; Passports of genetic reserves; Map of the distribution of forests of *The Organization* by categories; List of existing representative sample areas; Green book of Ukraine; Nature chronicles for nature conservation agencies, whose land border on the territory and / or located within the management unit without removal from the permanent user (NNP, biosphere reserves and natural reserves etc.); Projects of reforestation and natural regeneration; Program for restoration of degraded sites; Survey of professionals; Survey of stakeholders in particular NGOs, representatives of academic and research institutions and organizations, representatives of environmental institutions that are bordering or placed within a management unit (without removal from permanent user).

6.5.5. The size of the Representative Sample Areas* and/or restoration* areas is proportionate to the conservation* status and value of the ecosystems* at the landscape* level, the size of the Management Unit* and the intensity* of forest management.

Verifiers: Forest management plan; Stand-level mensurational description of stands; Provisions (passports) and protection obligations for NRF objects; Passports of genetic reserves, permanents forest seed plots; Map of the distribution of forests of *The Organization* by categories; List of existing representative sample areas; Green book of Ukraine; Nature chronicles for nature conservation agencies, whose land border on the territory and / or located within the management unit without removal from the permanent user (NNP, biosphere reserves and natural reserves etc.); Survey of professionals; Survey of stakeholders in particular NGOs, representatives of academic and research institutions and

organizations, representatives of environmental institutions that are bordering or placed within a management unit (without removal from permanent user), representatives of governmental organizations; Field observations.

6.5.6. Representative Sample Areas* in combination with other components of the conservation areas network* comprise a minimum 10 % area of the Management Unit* with proportional representation of main types of native ecosystems*.

Verifiers: Forest management plan; Stand-level mensurational description of stands; Provisions (passports) and protection obligations for NRF objects; Passports of genetic reserves; List of existing representative sample areas; Map of the distribution of forests of *The Organization* by categories; Survey of professionals.

EUROPE

BULGARIA

Effective since: 01.2016

6.5 *The Organization shall identify and protect representative sample areas of native ecosystems* and/or restore* them to more natural conditions*. Where representative sample areas* do not exist or are insufficient, *The Organization** shall restore* a proportion of the Management Unit* to more natural conditions*. The size of the areas and the measures taken for their protection or restoration*, including within plantations*, shall be proportionate to the conservation status and value of the ecosystems* at the landscape* level, and the scale, intensity and risk* of management activities*. (C6.4 and 10.5 P&C V4 and Motion 2014#7)**

6.5.1. Best available information* is used to identify all natural ecosystems* within the FMU* that exist in natural environmental conditions or that existed previously but are now degraded due to natural disturbances* or anthropogenic impact.

Verifiers: Documentary check: HCVF* Report, specialized studies, etc, Maps, Forest management plan; Field check: Check the presence and status of the identified areas as described in the indicator; Interviews: provide information if the staff and the workers* are acquainted.

6.5.2. *The Organization** ensures the protection* of representative sample areas* of all natural ecosystems* present within the FMU*.

Verifiers: Documentary check: HCVF* report, Nature 2000 standard data forms, Management plans of Protected areas and Natura 2000 sites, Forest regional plan for development, FMP (protection* of these sample areas is incorporated in the FMP), Maps of the identified old-growth forests*, Planning documentation* and maps, Programs for restoration*/reintroduction, Check of issued felling permissions (through the website of the Executive Forest Agency); Field check: Are there any activities taking place in the old-

growth forests*?, What activities are implemented for protection* of the representative sample areas*; Interviews: Provide information if the staff and the workers* are acquainted.

6.5.3. The size of each of the protected representative sample areas* of natural ecosystems and each one of the restoration areas* is determined according to its conservation* and ecological value. This value is determined for each ecosystem* at the level of the landscape* and FMU*.

Note: The aim is to preserve the rare* and vulnerable ecosystems*, as well as representative samples* of ecosystems* that are well presented and in favourable conservation status*. (please, consider Annex 11)

Note: For identified ecosystems according to 6.5.1 for which representative sample areas* are lacking within the FMU*, restoration areas* are included and *The Organization** plans restoration* activities for them.

Verifier: Documentary check: Maps, HCVF* Report, etc.

6.5.4. At least 5% of the area of the Management Unit* is designated as old-growth forests (OGF)* where human interference is not allowed.

Note: The 5% OGF* where human interference is not allowed are identified according to the requirements of Principle 9 (see Annex 13 – National HCVF* toolkit, Section HCV 3). In the absence of forests having the characteristics of old-growth forests* within the certified Management Unit*, *The Organization** must identify forests with potential to become old-growth forests*. These must be managed in a way leading to their transformation into old-growth forests*. In these stands forest management activities* and wood extraction are not allowed, except in the cases of large-scale natural disturbances* affecting over 30% of the area of the respective old-growth forests*.

Verifiers: Documentary check: Maps, HCVF* Report, etc.; Field check: Check the respective territories identified; Interviews: Provide information if the staff and the workers* are acquainted.

6.5.5 The representative sample areas* of natural ecosystems* are at least 10% of the area of the Management Unit*. In those areas forest management activities* are not allowed except for activities for restoration* of the forest to more natural conditions. OGF* identified according to 6.5.4 may be an addition to these areas or may be included as part of them.

Note for SLIMF*: For FMUs* smaller than 50 ha the requirement of the indicator is reduced to 5% forests in which human interference is not allowed.

Verifiers: Documentary check: Maps, HCVF* Report, etc.; Field check: Check the respective territories identified; Interviews: Provide information if the staff and the workers* are acquainted.

6.5.6. Where representative sample areas* of natural ecosystems* do not exist, or where existing samples inadequately represent the natural ecosystems*, *The Organization** restores* portions of the FMU* to more natural conditions* until the requirements regarding areas in Indicator 6.5.5 are met.

Verifiers: Documentary check: Maps, HCVF* Report, etc; Field check: Visit of the territories stipulated and managed aiming at the restoration* of natural ecosystems*.

6.5.7. Representative samples areas* of natural ecosystems* are shown on forest maps.

Verifiers: Documentary check: Maps.

PORTUGAL

Effective since: 01.2016

6.5 *The Organization* shall identify and protect representative sample areas of native ecosystems and/or restore them to more natural conditions. Where representative sample areas do not exist or are insufficient, *The Organization* shall restore a proportion of the 1 As per document FSC-GUI-60-001 V1-0 EN – Guidance on the Interpretation of FSC Principles and Criteria to take account of small scale and low intensity Management Unit to more natural conditions. The size of the areas and the measures taken for their protection or restoration, including within plantations, shall be proportionate to the conservation status and value of the ecosystems at the landscape level, and the scale, intensity and risk of management activities.

Guidance note: In the case of group certificates, the criteria can be fulfilled at group level. 2 Indicators Means of verification

6.5.1 The best available information is used to identify native ecosystems that exist, or would exist under natural conditions within the management unit.

Guidance note: The representative samples of the ecosystems mentioned in this indicator are selected by taking account of their proximity to their natural state, based on the sources listed in indicator 6.4.1, and other land use planning instruments, such as council plans and regional forest plans.

Means of verification: Management plan and/or associated documentation; Records (e.g. list of ecosystems that are present, maps); Field inspections; Stakeholder consultation (including specialists).

6.5.2 Representative sample areas of native ecosystems are protected, where they exist.

Means of verification: Management plan and/or associated documentation; Records (e.g. list of identified ecosystems, mapping, etc.); Field inspections.

6.5.3 [Applicable to non-SLIMFs] Where representative sample areas do not exist, or where existing sample areas inadequately represent native ecosystems or are otherwise insufficient, a proportion of the management unit is restored to more natural conditions.

Means of verification: Management plan and/or associated documentation; Records (e.g. list of identified ecosystems, mapping, etc.); Field inspections.

6.5.4 The size of representative sample areas and/or restoration areas is proportionate to the conservation status and value of the ecosystems at landscape level, the size of the management unit and the intensity of forest management. See also Annex V.

Means of verification: Management plan and/or associated documentation; Records (e.g. list of identified ecosystems, mapping, etc.); Field inspections.

6.5.5 Representative sample areas in combination with other components of the conservation and protected areas comprise a minimum 10 per cent area of the management unit.

Guidance note: In the case of small-scale SLIMFs, the area reserved for this purpose may be less than 10 per cent, if properly justified in environmental, economic, and social terms.

Means of verification: Management plan and/or associated documentation; Records (e.g. list of identified ecosystems, mapping, etc.); Field inspections.

SWEDEN

Effective since: 03.2019

6.5 *The Organization* shall identify and protect representative sample areas of native ecosystems and/or restore them to more natural conditions. Where representative sample areas do not exist or are insufficient, *The Organization* shall restore a proportion of the Management Unit to more natural conditions. The size of the areas and the measures taken for their protection or restoration, including within plantations, shall be proportionate to the conservation status and value of the ecosystems at the landscape level, and the scale, intensity and risk of management activities.

6.5.1 A selection of the productive forest land area is set aside and exempt from measures other than management to maintain and promote natural biodiversity or biodiversity conditioned by traditional land use practices. The selection of areas: a) covers a minimum of 5 % of the productive forest land area, b) is based on forest conservation values, landscape representativeness and biodiversity.

DIRECTIVES 6.5.1: The following are examples of areas that can be counted in:

a) Woodland Key Habitats,

b) natural, conspicuously uneven-aged and stratified forests,

c) the portion of the landholding that is formally protected (nature reserves, habitat protection areas) after a reduction equivalent to the area for which compensation has been provided,

d) areas with nature conservation agreements that are valid for more than 25 years, unless a shorter agreement is justified for nature conservation reasons,

e) protected buffer zones for areas set aside for nature conservation purposes,

f) forest wetlands that have been created or restored,

g) the share of jointly owned FSC-certified productive forest land for which there is a long-term nature conservation objective,

h) other woodlands with a canopy closure of at least 25 %, where the intensity of forest grazing or hay-making is sufficient to provide suitable conditions for flora/fauna that is favored by such practices.

Consideration patches and transition zones that are normally demarcated during forest felling cannot be counted in.

When previously voluntarily set aside forest land is formally protected and the forest owner has received financial compensation for this protection, new areas shall be set aside where this is necessary to meet the target of 5 % set aside areas. The forest owner may, however, count in the proportion of formally protected, previously voluntarily set aside land that exceeds 1 % of the landholding. When the compensation consists of exchange land, new areas shall be set aside in accordance with 6.5.1.

When previously voluntarily set aside forest land is formally protected, an alternative to setting aside new land exclusively for protection is to use alternative methods that combine production and nature conservation objectives in suitable areas. In such cases, the area requirement shall be adjusted to reflect the extent of the nature conservation objective. For example, an area where the forest management aims for 25 % nature conservation is counted as four to one; in other words, requirements for 10 hectares of new nature conservation set aside areas may be exchanged for 40 hectares with such combined objectives.

Landholdings above the nature conservation boundary (see directives for 9.3.4) are exempted from the requirements in 6.5.1.

Measures to promote recreational values in set aside areas can be carried out, provided that the conservation values are not negatively impacted.

Set aside areas are documented in the Ecological Landscape Plan or forest management plan. When selecting areas to be set aside, the extent to which different types of forest are protected in existing formally protected areas and voluntary set aside areas, as well as the authorities' conservation priorities, are taken into account.

GUIDANCE 6.5.1: A justification is needed for counting lands above the nature conservation boundary as set aside areas according to 6.5.1. The justification shall be based on high nature conservation values and representativeness, as well as the plan or strategy for the selection of set aside areas in the landholding as a whole.

6.5.2 At least 5 % of the productive forest land area is managed with long-term protection and enhancement of conservation values and/or social values as the primary objective. The following can be included, exclusively or in a combination:

a) further areas set aside to maintain and promote natural biodiversity or biodiversity conditioned by traditional land use practices, in addition to the 5 % that is set aside according to 6.5.1,

b) areas with enhanced nature consideration and specific nature conservation measures,

c) areas with long-term management in the form of continuous cover forestry or group felling with natural regeneration,

d) areas with enhanced considerations for recreational values and/or the local economy,

e) areas with enhanced considerations for reindeer husbandry.

DIRECTIVES 6.5.2: Areas according to 6.5.2a-c shall be selected based on high nature conservation values and the potential for conservation values, as reflected in assessments/analyses of conservation values and landscape ecology. Areas and consideration measures are normally selected in conjunction with landscape planning and/or forest management planning. The selection and documentation of areas in 6.5.2a-d can also be done continuously and be verified through regularly monitored action plans.

The same terms apply for setting aside areas according to 6.5.2a as for set aside areas according to 6.5.1.

For areas selected according to 6.5.2b-e, at least 50 % of the original volume shall be retained to enhance future conservation values and/or social values in the long term, unless it is apparent in the description of objectives that the protection/enhancement of these values requires the removal of larger volumes.

The selection of areas and enhanced consideration measures referred to in 6.5.2d is based on recreational values and the local economy in the area, and is preceded by dialogue/consultation with affected stakeholders in accordance with the requirements in 4.5.2 – 4.5.4.

The selection of areas and enhanced consideration measures referred to in 6.5.2e occurs after participatory planning or engagement with affected Sami villages and is based on the values in the area.

Areas/stands are demarcated on a map, and a description of management objectives, including specific environmental/social objectives and suggested measures, is documented.

Areas according to 6.5.1 and 6.5.2 together comprise at least 10 % of the productive forest land area.

“Specific nature conservation measures” refer to measures that are beneficial for the forest biodiversity, and which clearly differ in extent and qualitative focus from the more general measures that are required by other indicators in this standard. Measures can be carried out during different parts of the rotation cycle, but preferentially in conjunction with thinning or regeneration felling.

“Enhanced nature consideration” and “enhanced considerations for recreational values/reindeer husbandry” implies that a larger proportion of the stand/compartment is managed for considerations, compared to the more general considerations that are carried out as part of normal forest management. Such measures can be planned/implemented through the management classifications “combined goals” (Sw: Kombinerade mål (K)) or “production with enhanced consideration” (Sw: Produktion med förstärkt hänsyn (PF)).

All succession stages are included – not just older forest; for example, burned areas and deciduous tree successions.

GUIDANCE 6.5.2: The purpose of the indicator is to highlight forest areas where the forest owner has other objectives than management for traditional forest production.

The function of the entire area is documented according to the directives. Smaller patches of unproductive forest land may be counted as part of the delimited area provided that they comprise a natural, smaller part of the delimited area and contribute to strengthening the defined values.

Forest management planning may be conducted according to large forest owners' planning procedures, or through the establishment/revision of a smallholder's forest management plan.

Management classifications are often used in forest management as a tool to classify the objectives for the management of different sites. The classification is based on a gap analysis of what is lacking in the landscape.

Examples of areas/measures as per 6.5.2 include:

a) areas important for local tourism,

b) areas that are important for the local economy in other ways,

c) particular considerations for threatened species,

d) areas with a large proportion of trees with high biodiversity values,

e) areas with enhanced nature considerations adapted to the landscape, for example based on High-value Landscapes (Sw: värdetrakter), other landscape values, or action plans for threatened species,

f) mosaic lands with historical cultural impacts, such as forest grazing lands, pasture lands, hay meadows,

g) areas where structures/substrates are actively and extensively created, for example in the form of dead wood, stratification, restoration of hydrology,

h) areas with a large proportion of buffer zones and consideration patches,

i) burned areas of different ages, deciduous tree successions,

j) forests with a high abundance of arboreal lichens (Sw: hänglavsrika skogar).

6.5.3 Areas that are set aside according to 6.5.1 and 6.5.2a are quality assured and, where necessary, the selection and delimitation of set aside areas is revised with the purpose of increasing the nature conservation benefit. Revisions of set aside areas are documented.

GUIDANCE 6.5.3: A review of the selection, delimitation and conservation quality of the set aside areas may be carried out in conjunction with the revision of forest management plans and Ecological Landscape Plans, and when there is new knowledge about specific areas. The frequency of the revision of set aside areas depends on the size of the landholding and on the scale, intensity and risk of the management activities, as well as the state of knowledge about conservation values.

6.5.4 Long-term nature conservation objectives are formulated and documented for set aside areas, based on the analysis and assessment as per 6.3.1 and 6.3.2, and with the purpose of maintaining or enhancing biodiversity.

DIRECTIVES 6.5.4: Large forest owners shall consider action plans for threatened species and habitats (Sw: åtgärdsprogram för hotade arter och naturtyper) when developing strategies for conservation management measures. The forest sector goals for consideration-demanding habitats (Sw: målbilder för hänsynskrävande biotoper) are implemented in the monitoring, documentation, adaptation and application of forest management activities.

GUIDANCE 6.5.4: Action plans for threatened species and habitats can be found on the Swedish Environmental Protection Agency's website. For more detailed guidance on conservation management measures see the Swedish Forest Agency's report "Naturvårdande skötsel av skog och andra trädbärande marker." J. Nitare (2014) Skogsstyrelsen (in Swedish).

6.5.5 Set aside areas that require active conservation management measures are managed according to the nature conservation objectives formulated for the area.

DIRECTIVES 6.5.5: Measures that are carried out are documented.

6.5.6 Conservation management measures implemented in set aside areas are monitored. The results of monitoring and evaluation are documented and applied as per 7.4.1.

DIRECTIVES 6.5.6: The monitoring can be conducted through random sampling. The extent of monitoring is based on the focus of the measures, the size of the landholding and the results of previous monitoring.

LATIN AMERICA

MEXICO

Effective since: 10.2021

6.5 La Organización deberá identificar y proteger áreas de muestra representativas de los ecosistemas nativos* y/o restaurarlas hacia condiciones más naturales*. Cuando no existan áreas de muestra representativas* o éstas no sean suficientes, La Organización* deberá restaurar* una proporción de la Unidad de Manejo* hacia condiciones más naturales*. El tamaño de dichas áreas y las medidas aplicadas para su protección o restauración, incluidas las plantaciones, deberán* ser proporcionales al estatus de conservación* y al valor de los ecosistemas* a nivel del paisaje* y a la escala, intensidad y riesgo* de las actividades de manejo.

6.5.1 Se utiliza la Mejor Información Disponible* (Anexo C) para identificar los ecosistemas nativos* que existen o podrían existir en condiciones naturales* dentro de la Unidad de Manejo*.

6.5.2 Se definen y protegen las Áreas de Muestra Representativas* de los ecosistemas nativos*, cuando existan.

6.5.3 En los casos en los que no existan Áreas de Muestra Representativas*, o cuando las áreas de muestra existentes no representan adecuadamente los ecosistemas nativos*, o son de alguna manera insuficientes, se restaura* una parte de la Unidad de Manejo* hacia condiciones más naturales*.

6.5.4 El tamaño de las Áreas de Muestra Representativas* existentes y/o áreas de restauración* es proporcional al estado de conservación* y al valor de los ecosistemas* a nivel del paisaje*, el tamaño de la Unidad de Manejo* y la intensidad del manejo forestal.

6.5.5 Las Áreas de Muestra Representativas*, en combinación con otros componentes de la Red de Áreas de Conservación*, comprenden más del 10% de la superficie de la Unidad de Manejo*, consistente con el Diagrama Conceptual de la Red de áreas de Conservación (Anexo D), y dependiendo del tamaño de la unidad de manejo, la intensidad del manejo, y el nivel de protección* en el paisaje.

URUGUAY

Effective since: 10.2021

6.5 La Organización* deberá identificar y proteger áreas de muestra representativas de los ecosistemas nativos* y/o restaurarlas hacia condiciones más naturales*. Cuando no existan áreas de muestra representativas* o éstas no sean suficientes, La Organización* deberá restaurar* una proporción de la Unidad de Manejo* hacia condiciones más naturales*. El tamaño de dichas áreas y las medidas aplicadas para su protección o restauración, incluidas las plantaciones, deberán* ser proporcionales al estatus de conservación* y al valor de los ecosistemas* a nivel del paisaje* y a la escala, intensidad y riesgo* de las actividades de manejo.

6.5.1 Se utiliza la Mejor Información Disponible* para identificar los ecosistemas nativos* que existen, o podrían existir en condiciones naturales*, dentro de la Unidad de Manejo*.

Verificadores: Análisis de la información vs. la evaluación del sitio.

6.5.2 Se identifican y conservan las Áreas de Muestra Representativas* de los ecosistemas nativos*, cuando existan.

Verificadores: Identificación de áreas de muestras representativas / Cartografía / Plan de Manejo.

6.5.3 En los casos en los que no existan Áreas de Muestra Representativas*, o cuando las áreas de muestra existentes no representan adecuadamente los ecosistemas nativos*, o son de alguna manera insuficientes, se restaura* una parte de la Unidad de Manejo* hacia condiciones más naturales*.

Verificadores: Plan de Manejo

6.5.4 El tamaño de las Áreas de Muestra Representativas* existentes y/o áreas de restauración* es proporcional al estado de conservación* y al valor de los ecosistemas* a nivel del paisaje*, el tamaño de la Unidad de Manejo* y la intensidad* del manejo forestal.

Verificadores: Cartografía / Plan de Manejo.

6.5.5 Las Áreas de Muestra Representativas*, en combinación con otros componentes de la Red de Áreas de Conservación*, comprenden una superficie mínima del 10% de la Unidad de Manejo*.

Verificadores: Plan de Manejo / Registros.

NORTH AMERICA

CANADA

Effective since: 01.2018

6.5 *The Organization shall identify and protect representative sample areas* of native ecosystems* and/or restore* them to more natural conditions*. Where representative sample areas* do not exist or are insufficient, *The Organization** shall restore* a proportion of the Management Unit* to more natural conditions*. The size of the areas and the measures taken for their protection* or restoration*, including within plantations*, shall be proportionate to the conservation* status and value of the ecosystems* at the landscape* level, and the scale, intensity and risk* of management activities*. (C6.4 and 10.5 P&C V4 and Motion 2014#7)**

INTENT BOX

Overview

This Criterion* addresses effort to add to the Conservation Area Network* in the Management Unit* by filling gaps in the existing network with new designated conservation lands* and secondary conservation lands*. The role of *The Organization**, as expressed through this Criterion's* Indicators* is to lay the groundwork for working towards and achieving a vision for the Conservation Areas Network*.

Terminology

A Conservation Areas Network* is comprised of those portions of Management Unit* and adjacent area of ecological influence* for which conservation* is the primary, and in some circumstances, exclusive objective*. On public forests, the Conservation Areas Network* is the sum of protected areas* and designated conservation lands*. On private forests, the Conservation Areas Network* also includes secondary conservation lands*. Protected areas* are lands protected by legislation, regulation, or government land-use policy. Provincial parks are an example of these lands. Designated conservation lands* are to be managed through the exclusion of forest management activities* in recognition of their ecological and/or cultural values. Forest management is permitted on secondary conservation lands* provided that it maintains the ecological and cultural qualities that are the basis of the lands' designation. Refer to the Glossary for complete definitions of terms used in this Criterion*.

Objectives* - Public Forests

On public forests, a long-term* objective* of designated conservation lands * is to transition to legal* protected status (i.e. protected areas*). However, it is recognized that the ultimate decision to move those designated conservation lands* to protected status belongs to governments, not *The Organization**. Creation of protected areas* is usually the product of broad government initiatives that often include engagement* with stakeholders*, communities, and with Indigenous Peoples*. Lack of immediate increases in the regulated protected area network (i.e. within the period of

validity of a certificate) should be viewed in the context of the complexity of the processes involved and the challenges inherent in balancing ecological, social, economic and social interests. It does not necessarily imply failure to meet this Criterion's* Indicators*.

The process of attempting to move designated conservation lands* within the traditional territories of Indigenous Peoples* to legal* protected status can only proceed based on their Free, Prior and Informed Consent*.

Designated conservation lands* are expected to be permanently protected whether or not they are successful in transitioning to legally protected status. In other words, in the indefinite time between identification of designated conservation lands* and their movement to official legally protected status, the lands are to be exempted from forest management activities*, except in relatively rare circumstances (described in Indicator 6.5.9).

Objectives* - Private Forests

Privately owned forests are expected to contribute to the Conservation Areas Network* through the identification and creation of designated conservation lands* and secondary conservation lands*. However, private landowners are not expected to attempt to move designated conservation lands* or secondary conservation lands* to legislated status on their lands.

Relationship with Principle 9

This Criterion* focuses on identification of lands that serve to fill gaps in the Conservation Areas Network* for which protection* through the exclusion or limitation of forest management activities* should be a priority. Therefore, there is overlap between the mandate of this Criterion* and the role of High Conservation Values (HCVs)*, identified in Principle 9. As described in the HCV Common Guidance 3, and consistent with the HCV Framework provided in this Standard (Annex D), HCVs* can include areas that require total protection*, and areas that can be used to produce forest products if management is consistent with maintaining or enhancing HCVs*. Therefore, some areas identified as HCVs* can also be designated conservation lands* and secondary conservation lands*, and others, while still playing important roles in management activities* and conservation*, may not be. The identification of designated conservation lands* and secondary conservation lands* does not in any way detract from the importance of HCVs* in which some forest management activities* may still occur.

6.5.1 For forests* managed on public lands, an efficient process is used to engage* Indigenous Peoples* whose traditional territory overlaps the Management Unit* and self-identified interested and affected stakeholders*, regarding the identification and management of designated conservation lands*. The process includes the development of a mechanism to achieve consensus* on the identified designated conservation lands*.

INTENT BOX

This Indicator* requires that an engagement* process be undertaken with self-identified stakeholders*. Self-identified stakeholders* are stakeholders* with a history of FSC involvement and/or interest in conservation* and who express an interest in participating when informed of the opportunity to be involved. There is no requirement for *The Organization** to engage* stakeholders* who do not express an interest.

Dealing with many individuals and/or groups with overlapping interests can lead to an unwieldy process and slow progress. It is reasonable* that *The Organization**, in collaboration with the stakeholders* and affected Indigenous Peoples*, develop a process for efficient cooperation that may involve delegation of representation across groups that share common interests. Delegation requires the support of stakeholders* and affected Indigenous Peoples*.

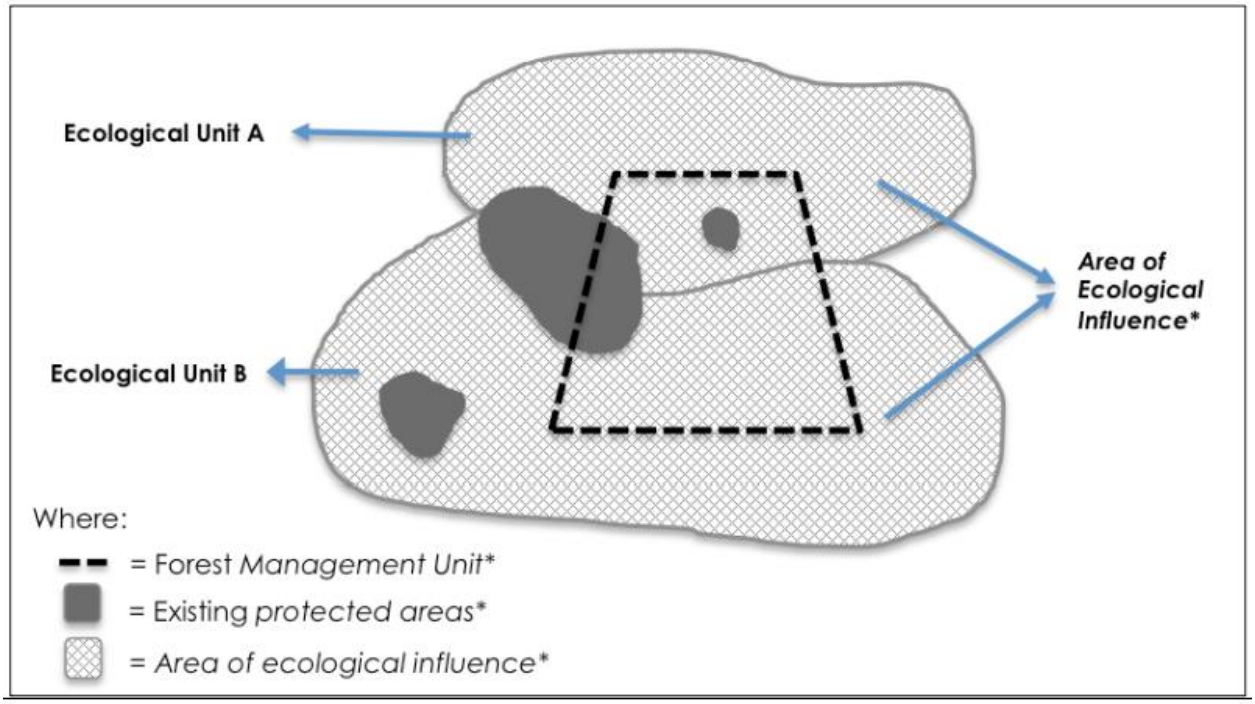
6.5.2 Using best available information*, an analysis is used to identify potential gaps in the completeness of the Conservation Areas Network* in the Management Unit*. Elements considered for inclusion in the gap analysis address enduring features*, representation of native ecosystems*, landscape* connectivity*, High Conservation Values* and High Conservation Value areas*. The analysis uses inputs from the entire area of ecological influence*. The results of the gap analysis are mapped.

INTENT BOX

Area of Ecological Influence

The area of ecological influence* (AEI) includes the entire area encompassed by ecological units (e.g. ecodistricts*, biogeoclimatic zones) that occur at least partly within the Management Unit*. The intent of using an area that extends beyond the Management Unit* in the gap analysis is to incorporate a broader landscape* perspective into consideration of the Conservation Areas Network*. An analysis that takes account of a broad landscape* (i.e. including the area of ecological influence*) is better suited to providing an accurate assessment of conservation* gaps. There may be circumstances in which there is little protected area* encompassed by the Management Unit*, but considerably more in the area of ecological influence*. In such a circumstance, there may be fewer gaps than would be identified if only lands encompassed by Management Unit* were used in the analysis.

In the figure below, the Management Unit* overlaps two ecological units, so the area of ecological influence* includes the total areas encompassed by both ecological units. To provide the most useful gap analysis, data from the entire area of ecological influence* should be used. However, depending on the size of the area of ecological influence*, and the availability of data formatted to facilitate efficient analysis, the level of effort required to incorporate all elements identified in the Indicator* that occur outside the Management Unit* may be unrealistic. A reasonable* starting point for the analysis would consider information on the size and location of protected areas* from outside the Management Unit*.



6.5.3 A peer review* of the gap analysis is completed by one or more independent experts*.

6.5.4 For forests* managed on public land, the gap analysis and peer review* are made publicly available*, including in electronic format.

6.5.5 Areas that address Conservation Areas Network* gaps are identified as designated conservation lands* or secondary conservation lands*.

INTENT BOX

As noted previously, designated conservation lands* may occur on both private and public forests, whereas secondary conservation lands* may occur only on private forests.

6.5.6 Designated conservation lands* and secondary conservation lands* are of sufficient size to ensure the values they are intended to address are effectively protected based on a precautionary approach*.

6.5.7 The Conservation Areas Network* comprises a minimum of 10% of the area of the Management Unit*. The extent of the Conservation Areas Network* on the Management Unit* is identified by considering:

1) Relative extent of the Conservation Areas Network* in the area of ecological influence*;

2) Contribution of the Conservation Areas Network* to the attainment of regional provincial, national and international (e.g. Aichi biodiversity targets) conservation* and protected area* targets;

3) Best available scientific information and research regarding appropriate conservation* targets;

4) Previous contributions of *The Organization** to Conservation Areas Network* on lands that were formerly within the Management Unit*; and

5) Socio-economic considerations (e.g. implications for wood availability and harvest levels). Evidence is provided to validate any claim of the existence of protected areas* that were formerly within the Management Unit*.

INTENT BOX

As described earlier, on public forests, the Conservation Areas Network* is the sum of protected areas* and designated conservation lands*, whereas on private forests, it also includes secondary conservation lands*. This Indicator* requires that the Conservation Areas Network* must comprise a minimum of 10% of the area of the Management Unit*. However, 10% should not be also interpreted as a maximum or desirable level in all circumstances. There may be instances in which a more extensive Conservation Areas Network* is warranted based on the factors considered in the gap analysis (Indicator 6.5.2), and the distribution of protected areas* and other ecologically and culturally important lands within the area of ecological influence*. Provided that at least the 10% threshold is reached, the overall size should reflect a balance of the points listed in this Indicator*.

6.5.8 For forests* managed on public land, consensus* is achieved on the identification of designated conservation lands* through implementation of the process identified in Indicator 6.5.1.

INTENT BOX

Indicator 6.5.8 builds upon the process identified in Indicator 6.5.1. Indicator 6.5.1 requires engagement* with Indigenous Peoples* and stakeholders* to build a process to achieve consensus*. It is expected that the process developed to achieve consensus* includes the participation of *The Organization**, and that the interests of *The Organization** be among those considered in the achievement of consensus*.

Consensus* should be the result of a process seeking to take into account the views of *The Organization**, Indigenous Peoples*, and stakeholders*, and to reconcile any conflicting arguments. It need not imply unanimity.

6.5.9 Forest operations including harvesting, silviculture*, and road* building, are not undertaken by *The Organization** within designated conservation lands* except when confirmed by independent expert* opinion as appropriate to achieve objectives* associated with restoration* or maintenance of natural conditions*.

INTENT BOX

Most organizations operating on public land can only control management activities* within their allocated rights as tenure* holders, and so this Indicator* refers specifically to “Forest operations…undertaken by *The Organization**”, recognizing that other industrial operations may have overlapping tenure* rights. Indicator 6.5.11 addresses obligations of *The Organization** related to its sphere of influence*.

In rare cases, road* building may be necessary to conduct management operations in areas beyond designated conservation lands*. Such road* building and maintenance within a designated conservation land* should only be undertaken when use or creation of existing or alternate access would be extremely difficult and result in more ecological damage than alternatives.

6.5.10 For forests* managed on private land, forest operations are undertaken on secondary conservation lands* only when they maintain the ecological and cultural qualities that are the basis of the lands' designation.

6.5.11 For forests* managed on public land, *The Organization** works within its sphere of influence* to achieve the following:

1) Move designated conservation lands* to full legal* regulated status;
2) Recognition of designated conservation lands* in management plans* and other relevant documents; and
3) Avoid harvesting, road* building and other operations proposed by other tenure* holders that are not consistent with conservation* objectives* of designated conservation lands*.

Free, Prior and Informed Consent* is obtained prior to efforts to work within *The Organization*'s* sphere of influence* to achieve regulated status for designated conservation lands* that overlap Indigenous Peoples'* traditional territories (per Criterion 3.2).

INTENT BOX

Sphere of Influence* and FPIC*

This Indicator* recognizes that Free, Prior, and Informed Consent* of Indigenous Peoples* is necessary before attempts should be made to move designated conservation lands* on traditional territories to legally protected status. *The Organization** is expected to inquire with Indigenous Peoples* regarding their interest in seeking legal* protection for lands in their traditional territories. Where FPIC* is not obtained, the lands are expected to remain as designated conservation lands*, but efforts on the part of *The Organization** to obtain legally protected status do not proceed. Requirements 2 and 3 in the above Indicator* are to be addressed regardless of the attainment of FPIC*, as these requirements do not relate to the attainment of legally protected status.

After Designated Conservation Lands* have been moved to legislated status

When an area of designated conservation lands* is moved to regulated protected status through collaborative efforts with the regional, provincial or federal government, new designated conservation lands* need not be identified to replace the ones that have been granted regulated status, although the objectives* associated with achieving the total area of the conservation areas network*, as identified in Indicator 6.5.7, would remain in place. The success of moving designated conservation lands* to regulated status should be noted by the auditors along with the gap that it addressed so that in future gap analyses, assessments and audits, *The Organization** will not need to 'replace' the formally protected designated conservation lands* with new ones.

6.5.12 The completed gap analysis is reviewed at least every five years, and updated if necessary, based on availability of new information or advances in gap analysis methodology. If

substantial changes to the gap analysis occur as a result of the update, a peer review* is undertaken.

INTENT BOX

This Indicator* requires that the gap analysis be reviewed at least every five years. This does not necessarily mean that the gap analysis will need to be redone at that interval. As the Indicator* requires, the analysis will only need to be redone or updated if relevant new information or an improved methodology becomes available.

For example, new information that may necessitate updating the gap analysis could include the creation of new protected areas* that address some of the previously-identified gaps, or an improved landscape* classification system that provides an improved basis for identifying gaps. The bar for deciding whether there is a sufficient basis for proceeding with an update should be neither too high nor too low. The expectation is that updates only are considered if it is likely that the new analysis will identify meaningfully different gaps from those identified in the previous analysis.

US

Second consultation draft.

6.5 *The Organization shall identify and protect Representative Sample Areas* of native ecosystems* and/or restore* them to more natural conditions*. Where Representative Sample Areas* do not exist or are insufficient, *The Organization** shall restore* a proportion of the Management Unit* to more natural conditions*. The size of the areas and the measures taken for their protection* or restoration*, including within plantations*, shall be proportionate to the conservation* status and value of the ecosystems* at the landscape* level, and the scale*, intensity*, and risk* of management activities*. (C6.4 and 10.5 P&C V4 and Motion 7:2014)**

Intent: The goal of this Criterion* is to manage or restore* sites to favor or form viable* examples of native ecosystems* that are typical and that would naturally occur in the Management Unit*. One of the primary provisions in Criterion 6.5 is to ensure that examples of ecosystem* types that are not protected* elsewhere in this Standard (see Criteria 6.4 and 6.6, and Principle 9) are protected* in their natural state within the landscape. A given area may serve to achieve conformance for multiple Criteria* (e.g., 6.4, 6.5, 6.6, and Principle 9). Representative Sample Areas* should reflect the full diversity of native ecosystems*, not just those that are forested*. However, they should not disproportionately represent non-forested* ecosystems*.

Representative Sample Areas* are to be established within the Management Unit*, except in a limited number of situations that are described in Annex G.
Representative Sample Areas* will generally be fixed in location, unless representative of ecosystems* within a shifting mosaic of ecosystems*, such as those resulting from frequent natural (or mimicked) disturbance.

Guidance: Additional guidance for identification and designation of Representative Sample Areas* is included in Annex G.

The expectation is to prioritize ecosystems* and ecological conditions that are in greater need of conservation* assistance. Annex G provides further considerations for which ecosystems* to emphasize, including when Representative Sample Area* establishment is not essential for a particular ecosystem*.

FF Indicator Intent: With very limited exceptions, conformance with Criterion 6.5 is expected, regardless of the scale* or intensity* of the Management Unit*. However, conformance with Indicator 6.5.1, FF Indicator 6.5.2, Indicator 6.5.5, Indicator 6.5.6, and Indicator 6.5.7 should be sufficient for ensuring that the core intent of this Criterion is addressed for family forest* Management Units*.

The Certification Body* is not expected to assess conformance of family forest* Management Units* with Indicators* that have been designated as 'not applicable' for family forest* Management Units*.

6.5.1 Best Available Information* is used to identify native ecosystems* that would typically occur within the Management Unit* given the existing climate and soil conditions.

6.5.2 Aligned with Annex G, viable* examples of native ecosystems* identified per Indicator 6.5.1 are designated as Representative Sample Areas* and protected.

FF 6.5.2 Representative Sample Areas* are established to conserve native ecosystems* that occur on the Management Unit* or could be restored*.

Federal Lands Supplement to Indicator 6.5.2 The applicable Federal agency establishes Representative Sample Areas* within the Management Unit* to conserve* or restore* viable* examples of all native ecosystems* that would naturally occur on the Management Unit* irrespective of the occurrence or protection of the ecosystems* outside of the Management Unit*.

FF Guidance: Annex G provides family forest*-specific guidance for conformance with Criterion 6.5

Federal Lands Guidance for Federal Lands Supplement to Indicator 6.5.2: Federal lands play a critical role in protecting and restoring native ecosystems*. It is therefore expected that the Management Unit* maintain and/or expand an ecologically viable, resilient, welldistributed, and where possible, interconnected protected area system for all native ecosystems* that would naturally occur on the Management Unit*.

6.5.3 Aligned with Annex G, if viable examples of native ecosystems* identified per Indicator 6.5.1 do not exist within the management unit* or are inadequately represented and/or protected in the landscape*, and the ecosystem* occurs within the Management Unit* in a degraded condition but could be restored, a portion of the management unit* which includes the ecosystem* is designated as a Representative Sample Area* and is restored* to more natural conditions*.

FF 6.5.3 Not applicable for family forest* Management Units*. Conformance with Criterion 6.5 for family forest* Management Units* is addressed through Indicator 6.5.1, FF Indicator 6.5.2, Indicator 6.5.5, Indicator 6.5.6, and Indicator 6.5.7.

Guidance: Further guidance regarding considerations for restoration potential is included in Annex G.

6.5.4 Aligned with Annex G, the extent of Representative Sample Areas* for a particular native ecosystem* is proportionate to the conservation* status and value of the ecosystem* at the landscape* level, and the overall extent of Representative Sample Areas* is proportionate to the size of the Management Unit* and the intensity* of forest* management.

FF 6.5.4 Not applicable for family forest* Management Units*. Conformance with Criterion 6.5 for family forest* Management Units* is addressed through Indicator 6.5.1, FF Indicator 6.5.2, Indicator 6.5.5, Indicator 6.5.6, and Indicator 6.5.7.

6.5.5 Management activities* within Representative Sample Areas* are limited to activities that support or do not detract from the Representative Sample Area* objectives for ecosystem* conservation* or restoration*.

Guidance: The primary purpose of a Representative Sample Area* is to conserve* (i.e., maintain or enhance) or restore* a particular native ecosystem* as an ecological reference area. Management to achieve this purpose may range from a more “hands-off” approach to more intensive management. Other management activities* may occur within a Representative Sample Area* as long as they support, or do not detract from, the primary purpose. In rare occurrences, when an activity is essential for achieving overall management objectives*, and any alternative would result in extensive damage to environmental or social values outside of the Representative Sample Area*, but could be accomplished within the Representative Sample Area* with limited negative impacts to the Representative Sample Area*, the activity may be implemented, as long as it is still possible to achieve the primary purpose of the Representative Sample Area*.

When forest* management activities* (including timber harvest) create and maintain conditions that emulate an intact, mature forest* or other successional* phases that may be underrepresented in the landscape*, the management system that created those conditions may be used to maintain them, and the area may be considered as a representative sample for the purposes of meeting this Criterion*. Representative Sample Areas* serving as ecological reference areas will generally not be managed for timber harvest, unless it is a necessary part of the conservation* strategy to maintain or enhance the ecosystem*. Threats such as wildfire, natural pests, or pathogens* may warrant management activities* as a means to conserve* the ecosystem*.

FF Guidance: Annex G Step 5 provides some resources to assist with management decisions for Representative Sample Areas*.

6.5.6 The process used to designate Representative Sample Areas* is documented and designation of Representative Sample Areas* is reviewed as part of the review of the management plan* (per Indicator 7.4.1) and, if necessary, updated.

Guidance: Documentation should generally be in writing. *The Organization** should describe the rationale for how decisions regarding Representative Sample Area* designation were made.

FF Guidance: Documentation of the process used for designating Representative Sample Areas* may be brief and less technical for family forest* Management Units*.

6.5.7 Representative Sample Areas*, in combination with other components of the conservation areas network*, comprise a minimum 10% area of the Management Unit*.

Intent: The conservation areas network* is established within the Management Unit*, except in a limited number of situations that are described in Annex H.

Guidance: *The Organization** will need to establish additional areas for the conservation areas network* if existing areas within the Management Unit* that are intended primarily to conserve* environmental or cultural* values for the long-term* do not achieve the 10% threshold.

Annex H provides additional guidance regarding identification of areas that may be identified as part of the conservation areas network*.

FF Guidance: See family forest*-specific guidance in Annex H.

6.5.8 Large*, contiguous Management Units* on public lands* establish and maintain a network of conservation zones* and/or protected areas* sufficient in size to maintain species* dependent on interior core habitats*.

FF 6.5.8 Not applicable for family forest* Management Units*. Conformance with Criterion 6.5 for family forest* Management Units* is addressed through Indicator 6.5.1, FF Indicator 6.5.2, Indicator 6.5.5, Indicator 6.5.6, and Indicator 6.5.7.

Guidance: The amount of interior core forest* needed to be sufficient will depend on which species* may be present and the shape of the forest* block. A forest* that is closer to a circle in shape provides much more interior core habitat* than a forest* block with the same number of acres but that is linear in shape (i.e., longer and thinner).

ANNEX B INTERVIEW GUIDE

General For all Participants

1) Name:
2) Country:
3) Background:
4) Role in FSC Certification (e.g. SDG member, certificate holder, etc.):
5) In general terms, what is your interest or experience with Criterion 6.5:

Standard Developers

1) Please describe the conservation areas network context in your jurisdiction (e.g. broadly the extent of CANs, RSAs, protection context - % of area protected, extent of tenures, private & public lands etc.)

2) What is the present direction in your Standard related to the 10% threshold? (We should know this before conducting the interview)

3) Please comment on each of the following (if relevant)
    a) Did incorporation of the 10% threshold pose a problem in Standard Development– Please describe the nature of the problem
    b) What, if any, differences existed between the chambers in their opinion of the 10% threshold
    c) How did the SDG arrive at the Standard's direction (e.g. facilitated sessions, research, input from PSU etc.)
    d) What solutions/alternatives to the 10% threshold were considered in the Standard Development Process
    e) Does the standard require different thresholds for forests of different size or ownership, or other qualities?

4) What other challenges, if any, did the SDG encounter in the development of 6.5 indicators?

5) Does a national or regional target for protected areas (Conservation areas) exist in your country/region.
    a) Is the difference between the national/regional target and the 10% threshold a source of concern/stress?

6) Have unforeseen issues with the 10% target arisen in its application – please describe them

7) What solutions do you believe may be possible?
    a) What challenges or impediments to the solutions may exist?

8) Do you believe that a 10% threshold (or whatever measure is in the Standard) is a disincentive for organizations to seek certification?

9) Were the Criterion 6.5 requirements subject to field testing prior to incorporation into the Standard?

10) Do you believe the 6.5 requirements are effective in achieving/encouraging CAN benefits?

11) To what extent does restoration figure into the 6.5 requirements?

12) Does the standard have specific conservation requirements for natural forests vs. plantations?

13) Do you believe that changes to the IGIs are necessary?
    a) If so please describe the changes and how they would resolve the issues that you have identified
14) What is your opinion of the 6.5 Conceptual Diagram (Annex D)
    a) Is the intent of the diagram clear?
    b) Was it useful in developing requirements for the Criterion?
    c) How do you think it can be improved, (or should it be removed or replaced)?

15) Any other concerns related to Criterion 6.5 you would like to express

Certificate Holders

1) What CAN threshold is used in the Standard that you are certified to, or seeking certification under?

2) Describe the challenges you encountered, or are encountering in meeting the threshold.

3) What are the root causes of the threshold issues.

4) Under what circumstances would a 10% threshold be acceptable/reasonable/practical

5) What other thresholds would be acceptable/reasonable/practical

6) Have you quantified the cost of adhering to the Standard's threshold?

7) What approaches could be useful in implementing a CAN threshold? (e.g. different thresholds based on forest size, ownership, landscape context, etc.)

8) Are the Criterion 6.5 requirements in your Standard clear?
    a) Please describe in detail issues with clarity of requirements

9) Are there challenging components to Criterion 6.5 other than the threshold?

10) Were you required to restore any forests to meet the 6.5 requirements?

11) What solutions can you recommend or addressing the challenging components?

12) For certified Organizations and Organizations in the certification process, was an NCR identified for your implementation?
    a) Please describe the NCR
    b) Do you believe that the auditors interpreted and applied the requirements appropriately and fairly?

13) Do you believe that the issues you encountered were also experienced by other certificate holders

14) Did you participate in any way in the development of the C6.5 components of the Standard?

15) Does a national or regional target for protected areas (Conservation areas) exist in your country/region.
    a) Is the difference between the national/regional target and the 10% threshold a source of concern/stress?
    b)
16) What are the conservation objectives in your forest?
    a) To what extent are the conservation objectives achieved?
    b) What are the reasons the conservation objectives are/are not achieved.

17) Do you have any comments related to the 6.5 conceptual Diagram (Annex 2)

18) Any other concerns related to Criterion 6.5 you would like to express?

Certification Bodies/Auditors.

1) Approximately how many audits and assessments have you/your organization undertaken in which you reviewed the performance of Criterion 6.5 requirements?
    a) In what proportion were issues/NCRs with C6.5 identified?
    b) In what proportion were issues/NCRs with the threshold requirements of 6.5 identified?
    c) What are the most common and challenging issues associated with C6.5?

2) Do you believe that the C6.5 Standards of the countries in which you work are clear?
    a. Please describe issues with clarity.

3) Please describe challenges that forests you have audited/assessed have in adhering to CAN threshold requirements.

4) Are any challenges unique or specific to forest types (i.e. natural forests, ownership types, sizes, etc.)

5) If you have experience in more than one country/region, please compare your experiences in the countries/regions.

6) In your experience is the 10% threshold a significant issue in achieving conformance and/or pursuing certification?

7) Are the threshold requirements in the Standards that you audit to clear?
    a) If not, please explain clarity issues

8) Do you believe that the 10% threshold is a significant impediment in achieving or pursuing certification?

9) What, if any complaints/comments regarding the threshold have you heard from your clients? (attribution not required).

10) In your experience, is the 10% threshold reasonable/practical/achievable.

11) What other approaches to thresholds do you think may be reasonable/practical/achievable (e.g. different thresholds based on forest size, ownership, landscape context, etc.)

12) What if any complaints/comments regarding other aspects of C6.5 have you heard from your clients (attribution not required).

13) What, if any, improvements do you think could/should be made to other aspects of C6.5?

14) Do you think C6.5 is effective in achieving conservation benefits?
    a) How could the effectiveness be improved

15) Do you have any comments related to the 6.5 conceptual Diagram (Annex 2)

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