

FSC Controlled Wood

Risk Assessment preparation process





1 Background

To streamline the process of preparing risk assessments for Controlled Wood, FSC developed the procedure “**FSC Controlled Wood Risk Assessments by FSC accredited National Initiatives, National and Regional Offices**” (FSC-PRO-60-002). Published in 2009, it seeks to guide FSC National Offices through the process. It is divided into seven sections, which are summarized in Table 1.

This guidance document leads the reader through this content by providing detailed guidance on the process and using language that is easy to understand.

General points in relation to the process:

- Risk assessments can be prepared both by FSC endorsed National Initiatives, and FSC National and Regional Offices. For simplicity, this guidance document simply refers to National Offices (NO's).
- NOs can prepare risk assessment covering all categories, or only certain CW categories or indicators. Thus the risk assessment prepared by NOs can be a **FULL** risk assessment or a **PARTIAL** risk assessment. In the latter case the risk assessment will aid companies, however companies will still have to prepare the full risk assessment themselves. Thus it is advisable for NOs to prepare full rather than partial risk assessments.

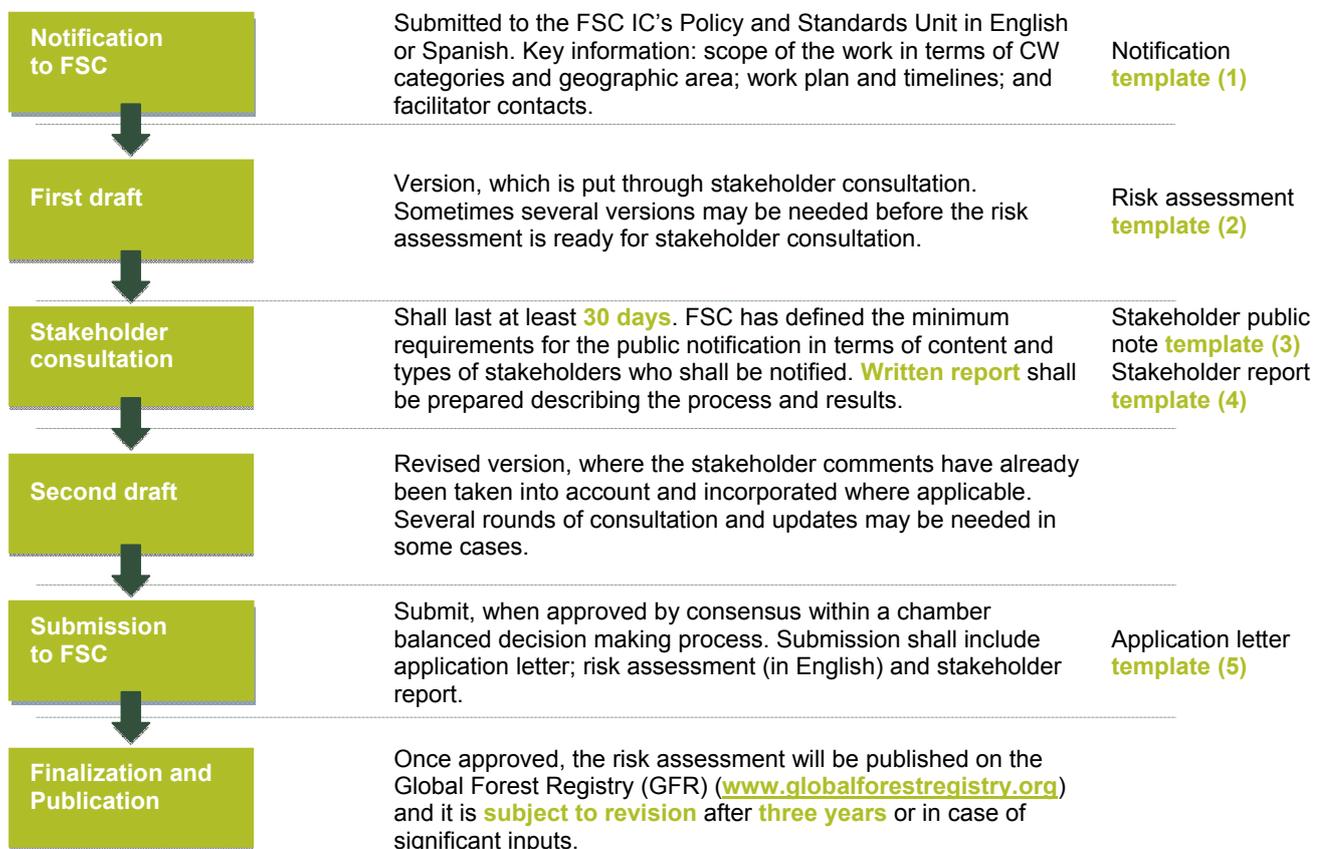
Table 1. Content of the FSC procedure and intent of the sections

Section	Central idea
1 Proposal to develop an FSC Controlled Wood Risk Assessment	FSC Center wants to be aware of the ongoing process for risk assessment, thus they should be notified about such plans.
2 Preparatory drafting and stakeholder consultation	Risk assessment shall undergo proper stakeholder consultation and the comments shall be taken into consideration during revisions.
3 Content	Content shall follow the requirements specified in the CW standard.
4 Submitting the Draft FSC Controlled Wood Risk Assessment for decision making	Once risk assessment is ready, it can be submitted to FSC, who will either approve it or specify areas which need to be addressed before approval.
5 Approval as a FSC Controlled Wood Risk Assessment	Once approved, the risk assessment will be published
6 Review and revision of a FSC Controlled Wood Risk Assessment	Timeline and scenarios for revision of the risk assessment.
7 New evidence, complaints and disputes	What to do if there are stakeholder suggestions that the risk assessment shall be reviewed.



2 Key steps

The process of risk assessment preparation can be divided into a few key steps. Outlined below, each step includes key points that you will need to remember. Through this project, templates are available to aid you through these various steps.



More detailed information about the outlined steps is provided in the following section, where each clause in the FSC procedure is explained.



3 Detailed guidance of the FSC procedure

Critical words/sections have been highlighted in red. The explanation and guidance included is not part of the FSC Procedure, but rather information to aid you in better understanding the context and what is needed.

FSC-PRO-60-002 clause	Explanation and guidance
1. Proposal to develop an FSC Controlled Wood Risk Assessment	
<p>1.1 A formal notification of the development of the proposed FSC Controlled Wood Risk Assessment shall be submitted in English or Spanish to the FSC Policy and Standards Unit containing at least the following information:</p> <p>a) aims and objectives of the proposal (e.g. assessing risk for harvesting wood from all FSC Controlled Wood Categories in...), including the geographic scope i.e. the district(s) covered by the proposed Risk Assessment; NOTE: For a definition of 'district' see FSC-STD-40-005.</p> <p>b) Summarized work plan and including expected starting date, main activities and expected conclusion date;</p> <p>c) Name and contact details of the facilitator(s) nominated by the FSC-accredited National Initiative to manage the process.</p>	<p>The FSC International Center (FSC IC) needs to be aware of the ongoing processes for risk assessment. This simply requires that a written notification is submitted to FSC when a decision is taken to prepare a risk assessment. In cases where the process has already commenced, there is no need to start the process again. Instead, notification shall be sent to FSC at the first possible opportunity. In such cases, indicate also the activities which have already been conducted in the timeline.</p> <p>It is important to state which CW categories and indicators the risk assessment covers. It is important to list the geographic coverage i.e. the district for the risk assessment. Normally the district is the country for which the assessment is prepared; however it can be also a smaller area (e.g. part of country such as a state or region). Notification shall also include key planned events.</p> <p>TIP: Make sure the timeline for the key steps described in section 2 are included. Finally the contact person should be the key person who has overall responsibility for the whole process.</p> <p>A template for the FSC notification is available (see template 1).</p>
2. Preparatory drafting and stakeholder consultation	
<p>2.1 The following drafts shall be prepared:</p> <p>a) a first draft, which shall be widely distributed to stakeholders for comment;</p> <p>b) a second draft, which takes account of stakeholders comments.</p> <p>c) a final draft for submission to FSC (see Section 4)</p> <p>Note: the different versions must be identifiable by unique version numbers (e.g. "Draft 1-0").</p>	<p>Central idea is to document the risk assessment version which is published for consultation so that the contents before as well as after stakeholder input is documented separately. This version should be numbered "Draft 1-0". The second and final draft may be same in cases where there is one stakeholder consultation round and the draft for submission to FSC is finalized after stakeholder consultation. A second round of consultation and second draft is needed only where substantial changes had to be made to the first draft.</p> <p>A template for the risk assessment is available (see template 2).</p>
<p>2.2 Additional working drafts may be required, at the discretion of the Facilitator(s).</p>	<p>If the process is lengthy and/or complicated, several rounds of consultation or stakeholder meetings may be required. Significant changes or developments of the risk assessment should be saved as a separate version and maintained. Minor changes and improvements during the work progress do not need to be saved as separate drafts. The purpose is to have documentation how the overall conclusions have evolved and changed over time. There is no upper limit to the amount of drafts, and the facilitator shall make these decisions at his own discretion.</p>
<p>2.3 The drafts for consultation shall be sent by the Facilitator(s) to all key stakeholders identified according to Annex 1, including:</p> <p>a) a brief, clear description of the purpose of the FSC Controlled Wood Risk Assessment and the</p>	<p>It is important that all key stakeholders have a chance to comment on the risk assessment. It is not sufficient to publish the draft on internet; rather it is required to proactively contact such stakeholders. Guidance list of the types of stakeholders has been provided in Annex 1 of the</p>



role of stakeholders;
b) a brief, clear description of the scope and objectives of the proposed FSC Controlled Wood Risk Assessment;
c) the contact details of the Facilitator(s) for further information;
d) the estimated timeline for completion of the proposed FSC Controlled Wood Risk Assessment;
e) statement that the development process will follow the requirements of this FSC procedure.

FSC procedure. This list has been included and explained also in this guidance document in section 4. The minimum required contents of the notification is rather straightforward. Sample text, which can be used is provided in template 2, however this shall of course be carefully reviewed and adjusted. Most importantly, **easy access to the risk assessment itself** must be provided. Consider if making it available digitally is sufficient? Do all relevant stakeholders have access to internet or should you send the materials as hard copies etc. If you send digital files, send them in editable format (e.g. word comment instead of PDF) to facilitate easier commenting etc.

TIP: It is important to use simple and understandable language in the stakeholder notification to ensure that everybody understands the purpose and idea. Regarding points a) and b), the purpose is to produce a risk assessment for the specific country, while the objective is to analyze the risk within each CW category.

A template for the stakeholder notification is available (see template 3).

2.4 The period to submit comments on drafts for public consultation shall be a minimum of **30 days** from the date of publication.

The stakeholders shall have a minimum 30 days to respond from the moment when they receive the information. It is very important to ensure that this timeline is **fully respected**. It is advisable to plan some extra time on top of this **minimum** requirement.

2.5 The Facilitator(s) is responsible for reviewing the comments submitted by stakeholders and suggesting wording on specific aspects that may achieve the consensus of all stakeholder groups.

2.6. The Facilitator(s) shall prepare a **report** on the consultation which includes:
a) a summary of the issues raised;
b) an analysis of the range of stakeholder groups who have submitted comments;
c) a general response to the comments;
d) an indication of how they have been taken into account in subsequent public drafts; and
e) a copy of all the formal comments as an Annex.

A **written overview** of the stakeholder consultation process and outcomes is required. The report shall provide an overview of how representative the stakeholder consultation process has been and a summary of the issues which were raised by stakeholders. It is useful to clarify in the report in relation to which CW categories and indicators the comments were mainly submitted.

The report shall provide information detailing the extent to which comments impacted the risk assessment and how it was changed based on the comments received. It is important that records from all formally submitted comments are maintained. Comments should be regarded as formal when they are attributable to a specific person, but not when submitted anonymously. This includes all comments submitted electronically (e.g. by email, fax etc.). Such comments shall be compiled into an annex and sent together with the report.

A template for the stakeholder consultation process report is available (see template 4).

3. Content

3.1 The content of the drafts developed shall follow the requirements of FSC-STD-40-005 Annex 2 and include the FSC Controlled Wood Risk Assessment title, version and draft number, date, status, time-limit for comments, a and the contact details of the Facilitator(s). For the Risk Assessment template please see Annex 3.

This point simply requests that the contents shall follow the relevant requirements from the FSC CW standard and relevant metadata such as date, version etc. The template prepared for risk assessment follows all applicable requirements and contains the required information.

A template for the risk assessment is available (see template 2).

4. Submitting the Draft FSC Controlled Wood Risk Assessment for decision making

4.1 The final draft FSC Controlled Wood Risk Assessment may be send to FSC when it:
a) has undergone sufficient consultation;

a) Sufficient consultation should be understood as consultation during which representatives of key stakeholder groups have been involved in discussions to reach a



- b) meets the aims and objectives specified in the work plan;
- c) merits the approval by the Supervisor of the FSC Policy and Standards Program;
- d) has been approved by consensus and within a chamber balanced decision making process.

consensus based conclusion or alternatively conclude that no consensus can be achieved and different viewpoints have been described. See point (d) below regarding consensus

- b) The objectives have been met if the risk assessment has been completed for the full scope (desired categories and districts) and clear risk designation has been assigned for each category.
- c) This will be finally decided by the FSC Policy and Standards Unit, however an **effort** needs to be made to comply with all relevant points of the FSC Procedure, **before submitting** the risk assessment to FSC.
- d) Ideally the risk conclusion is made based on consensus. This means that the majority of stakeholders from each chamber should be supportive of the risk designation. Sometimes there may be very different opinions, even within the chambers and quite often between chambers. The aim of reaching consensus can be very challenging as a result. This is a **topic of central importance** in the risk assessment preparation process. If fundamentally different opinion remain between chambers, the risk status shall remain "unspecified" based on a precautionary approach. If a decision is still made to submit the risk assessment for approval to FSC, such diverging opinions shall be clearly recorded in the stakeholder report so that the FSC Policy and Standards Unit can make an informed decision. Even if agreement is reached on a chamber level, however individual key stakeholders maintain different opinions, it is highly advisable to record such opinions in the stakeholder report.

4.2 The final draft FSC Controlled Wood Risk Assessment shall be sent **in English language** to the FSC Policy and Standards Unit together with a short application letter and a copy of the stakeholder consultation report.

Make sure the package includes all three required elements:

- Application letter
- Risk assessment itself
- The stakeholder report

The package shall be submitted to FSC IC's FSC Policy and Standards Unit.

As of November 2010, the person responsible for review of risk assessments is FSC Policy Manager Richard Robertson (email: r.robertson@fsc.org, phone +49 228 367 66 29).

4.3 The FSC Policy and Standards Unit either:

- a) approves the FSC Controlled Wood Risk Assessment; or
- b) approves the FSC Controlled Wood Risk Assessment with minor amendments; or
- c) rejects the FSC Controlled Wood Risk Assessment.

FSC will review the risk assessment and will respond either by approving the risk assessment or by specifying which aspects need to be addressed before approval can be granted. An approval may be given for the risk assessment as it is, or alternatively the approval may come on the condition that minor issues are addressed.

NOTE: If the FSC Policy and Standards Unit rejects the FSC Controlled Wood Risk Assessment, the reasons for the rejection will be communicated together with a suggestion on steps necessary to address any concerns.

5. Approval as a FSC Controlled Wood Risk Assessment

5.1 If the FSC Controlled Wood Risk Assessment receives the approval of the FSC Policy and Standards Unit, it will be published on the Global Risk Assessment (under development in collaboration with NEPCo) and publicly announced.

The Global Forest Registry (GFR) (www.globalforestregistry.org) is currently the FSC designated public database where all approved risk assessments will be published. NEPCo is responsible for uploading and publication the risk assessments once the information is submitted to NEPCo from FSC. Although no intervention from NO's is needed for publication, NEPCo contact persons may be found on the database homepage.

6. Review and revision of a FSC Controlled Wood Risk Assessment

6.1 After approval by FSC, typographical errors



and minor inconsistencies may be corrected by the FSC-accredited National Initiative without the approval of the FSC Policy & Standards Unit.

6.2 In the case of changes resulting from corrections or amendments as described in 6.1, the updated FSC Controlled Wood Risk Assessment will be given a new version number, V1-1, V1-2, etc., together with the date of the update. The most recent version shall be sent to the FSC Policy & Standards Unit for publication on the Global Risk Assessment.

Minor updates normally do not result in new main version number (e.g. from version 1 to version 2). Rather they are indicated by the secondary version number (e.g. V1-2 to V 1-3).

6.3 The FSC-accredited National Initiative shall keep records of and assess all comments on the FSC Controlled Wood Risk Assessment that have been submitted after approval.

Incoming written submissions shall simply be stored by the NO.

6.4 Should new evidence be presented that may change the risk conclusion from 'low' to 'unspecified' or vice versa for any of the Controlled Wood categories, the responsible FSC-accredited National Initiative shall prepare and consult a new draft for this category of Controlled Wood according to the steps outlined above.

It is the obligation of the NO to evaluate all incoming communication. The NO shall decide upon its discretion if the submitted comments are credible and significant enough to warrant immediate review of the risk assessment and its conclusions or whether the comment can be considered during periodic review (see below). 7.1 is also related to this point.

6.5 No later than **three years** after the approval date, the FSC-accredited National Initiative shall collate and review all the comments on the Risk Assessment, as well as taking into account external circumstances and its continued relevance.

3 years is the maximum time after which a review shall occur. The review shall consider received communication and should also consider if conditions within the district have changed significantly to warrant changes in the risk assessment. The risk assessment content may remain unchanged if no changes are needed and justified.

6.6 Based on the results of the review process, the FSC-accredited National Initiative may decide that a formal revision of the FSC Controlled Wood Risk Assessment needs to be implemented.

If significant evidence exists that the risk status may be incorrect and should be reviewed, a similar process to the initial risk assessment process will need to be carried out.

6.7 A revision process (except for items as stipulated in of 9.1) shall be conducted according to the requirements specified in this procedure and submitted for approval.

6.8 If an FSC-accredited National Initiative ceases to exist and no entity is taking the responsibility for reviewing or revising the approved FSC Controlled Wood Risk Assessment, the FSC Policy and Standards Unit may decide to revoke the Risk Assessment in parts or in full.

7. New evidence, complaints and disputes

7.1 New evidence, complaints or disputes related to the content of the approved FSC Controlled Wood Risk Assessment shall be responded to by the FSC-accredited National Initiative. Should the complaint/dispute substantively affect the Controlled Wood Risk Assessment, then it shall be considered according to 6.4 of this standard.

See comments in 6.4.

7.2 Complaints/disputes related to procedural issues shall be responded to initially by the FSC-accredited National Initiative(s). If the complainant is not satisfied with the explanation provided by National Initiative(s), the complaint/dispute shall be sent to the FSC Policy and Standards Unit.

7.3 The FSC Policy and Standards Unit may invalidate a Risk Assessment in parts or in full as a result of a complaints process.

This is normally done if it appears that the risk assessment preparation process has severely violated the principles set out by FSC (e.g. no proper stakeholder consultation; important evidence neglected etc.).



4 Stakeholders to be contacted

The types of stakeholders below are listed directly from Annex 1 of FSC-PRO-60-002. It is important to specify specific organizations or individuals who should be consulted and/or involved in the development process. The list of stakeholders shall be maintained and updated. This is also needed for the stakeholder report, which shall be sent to FSC.

It is not necessary that all these groups provide input for the risk assessment. Firstly some groups may not be present in the country (e.g. indigenous groups) or are very weakly established and not organized enough to work with the issues (e.g. timber producers associations). Secondly even though stakeholders are contacted and asked to provide input, some stakeholders may not be willing or able to provide comments or do not have an opinion in relation to the risk assessments. Although efforts should be made to explain the background, importance and possible consequences of not providing input, the decision to engage in the process ultimately relies on the stakeholder.

In all such cases it is important to describe the situation and justify why some stakeholder groups have not been consulted or have not provided input. The table below is for general guidance only and shall be correctly interpreted and implemented in the national context in each country, but bear in mind that the table may not be conclusive.

	FSC defined stakeholder group	Comments
Economic chamber	Large forest owners	There is no defined minimum area for “large” forest forests in the FSC system; however normally owners managing forest areas above 10,000 ha shall be considered large managers. This also depends on the regional context. Forest owners who can’t be classified as small or low intensity managers, shall be classified as large. See references below. Large companies and managers of state owned forests potentially fall under this category.
	Small forest owners	According to FSC-STD-01-003 (SLIMF eligibility criteria), any forest owners managing forest areas under 100 ha, can be considered small forest owners. In some countries this threshold has been increased; these countries are listed in the SLIMF eligibility Criteria Addendum (FSC-STD-01-003a), which can be accessed on FSC homepage. Normally forest owners managing areas larger than 1,000 ha cannot be considered small anymore. In some countries small forest owners are joined in private forest owners unions or associations. These organizations may provide a central contact for this stakeholder group.
	Low intensity forest managers	According to FSC-STD-01-003 managers who are harvesting less than 20% of the mean annual increment AND who are harvesting in total less than 5,000 cbm annually can be considered low intensity managers. These types of commercial managers are not very common in boreal or temperate region, however low intensity management may occur in some tropical areas or in cases when the financial income is not the primary purpose of forest management (e.g. research institutions etc.).
	Forest contractors (e.g. harvesting companies)	All companies who are offering various services for conducting forestry works. Most commonly these are companies who are either purchasing roundwood themselves as standing stock and conducting harvesting themselves or simply service providers. Services are sometimes not limited just to felling, but may also include forest regeneration, soil scarification, forest infrastructure works and other works in the forest.
	Timber producers associations	Organizations that pool timber manufacturers together are very useful central contacts for timber industry. Often these organizations are called forest/timber industry associations and normally their membership includes key companies in the forest sector in the country. In some countries such level of organization is not in place, in which case this category is not applicable.
	Primary timber manufacturers	Primary manufacturers are companies who use roundwood as input. Most common types of primary manufacturers are sawmills, pulpmills and plywood mills. Such types of companies are not normally organized separately from further manufacturers, however they are often members of general forestry or timber manufacturers associations (see category above).



Social chamber	Forest workers	If there is a forest workers trade union or association present, this provides a useful central contact.
	Indigenous people	The appropriate methods of consultation are especially important to consider in relation to this. Representatives of indigenous people shall be involved in a meaningful way.
	Local communities	Again, individual key people are often difficult to identify, thus it is advisable to seek organizations that are active in advancing regional community life.
	Nature recreational groups	Effort should be made to contact recreational organizations whose activities are also related to forest area.
Environmental chamber	Environmental stakeholders interested in biodiversity; water; soils; ecosystems and landscapes	Most common stakeholders in this category are environmental non-profit organizations. Effort should be made to identify and receive input from key organizations working in this field.

5 Templates

The following templates are available to assist NO's in the process of preparing and submitting their Controlled Wood risk assessment to FSC IC's Policy and Standards Unit. The templates are provided as separate files.

	Purpose of the template	File type
1	Notification to FSC about initiating the process	Word file
2	Risk assessment template	Excel file
3	Public notification to stakeholders	Word file
4	Stakeholder report	Word file
5	Application letter for FSC (to be sent when submitting risk assessment for approval)	Word file