Forest Stewardship Council®

20 Years of growth with FSC® 1994-2014

FSC® PROCEDURE

The Development and Approval of FSC® National Risk Assessments

FSC-PRO-60-002 V3-0 EN





FSC NETWORK

© 2014 Forest Stewardship Council A.C. All rights reserved.

Title:	The Development and Approval of FSC® National Risk Assessments
Document reference code:	FSC-PRO-60-002 V3-0 EN
Approval body:	FSC Board of Directors
Contact for comments:	FSC International Center - Policy and Standards Unit - Charles-de-Gaulle-Str. 5 53113 Bonn, Germany +49-(0)228-36766-0 +49-(0)228-36766-30 policy.standards@fsc.org

© 2014 Forest Stewardship Council, A.C. All rights reserved.

No part of this work covered by the publisher's copyright may be reproduced or copied in any form or by any means (graphic, electronic or mechanical, including photocopying, recording, recording taping, or information retrieval systems) without the written permission of the publisher.

Printed copies of this document are for reference only. Please refer to the electronic copy on the FSC website (ic.fsc.org) to ensure you are referring to the latest version.

The Development and Approval of FSC® National Risk Assessments

FSC-PRO-60-002 V3-0 EN

The Forest Stewardship Council® (FSC) is an independent, not for profit, non-government organization established to promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC's vision is that the world's forests meet the social, ecological, and economic rights and needs of the present generation without compromising those of future generations.

© 2014 Forest Stewardship Council A.C. All rights reserved.

Contents

A Objective
B Scope
C Effective and validity dates
D References
E Terms and definitions

PART I DEVELOPMENT OF A NATIONAL RISK ASSESSMENT

1 Scope of a National Risk Assessment
2 Working bodies and their roles and responsibilities
3 Proposal to develop a National Risk Assessment
4 Drafting a National Risk Assessment
5 Stakeholder consultation
6 National approval process

PART II EVALUATION AND APPROVAL OF A NATIONAL RISK ASSESSMENT

7 Evaluation of a National Risk Assessment
8 Approval of a National Risk Assessment

PART III MAINTENANCE OF A NATIONAL RISK ASSESSMENT

9 Evaluation of information
10 Review and revision of a National Risk Assessment

PART IV ADDITIONAL REQUIREMENTS

11 Intervention mechanism
12 Complaints and disputes related to National Risk Assessments

Annex A Stakeholder groups to be consulted in the NRA process

Annex B Proposal for NRA development template

Annex C National Risk Assessment template

Annex D Risk Assessment evaluation template (informative)

Annex E Process guidance on developing a National Risk Assessment (informative)

© 2014 Forest Stewardship Council A.C. All rights reserved.

A Objective

The objective of this procedure is to provide a clear, transparent, and unambiguous methodology for developing, maintaining, revising, evaluating, and approving FSC National Risk Assessments (National Risk Assessments or NRAs) for FSC Controlled Wood. The procedure contains requirements for a National Risk Assessment development process, whilst requirements for risk assessments are included in procedure addendum *FSC-PRO-60-002a FSC National Risk Assessment Framework*.

B Scope

This document specifies the requirements and procedures to develop, maintain and revise National Risk Assessments. It also specifies requirements and procedures for FSC[1] to evaluate and approve such NRAs.

All aspects of this procedure are considered to be normative, including the scope, effective date, references, terms and definitions, tables, addenda and annexes, unless otherwise stated.

NOTE: National Risk Assessments are required for use by Organizations sourcing FSC Controlled Wood using *FSC-STD-40-005 Requirements for sourcing FSC Controlled Wood*.

C Effective and validity dates

Approval date	10 November 2014
Publication date	01 December 2014
Effective date	01 January 2015
Period of validity	until 31 December 2019 (or until replaced or withdrawn)

D References

The following documents, in whole or in part, are normatively referenced in this document and are relevant for its application. For undated references, the latest edition of the referenced document (including any amendments) applies.

FSC-PRO-01-009 Processing formal complaints in the FSC certification scheme
FSC-PRO-60-002a Addendum: FSC National Risk Assessment Framework
FSC-PRO-60-002b Addendum: List of FSC approved Controlled Wood documents
FSC-STD-60-006 Process requirements for the development and maintenance of National Forest Stewardship Standards

E Terms and definitions

For the purpose of this procedure, the terms and definitions provided in *FSC-STD-01-002 FSC Glossary of terms*, *FSC-STD-40-005 Requirements for sourcing FSC Controlled Wood,* and the following apply:

[1]Throughout this procedure, 'FSC' refers to the Controlled Wood Program of the FSC Policy and Standards Unit of FSC International Center.

© 2014 Forest Stewardship Council A.C. All rights reserved.

Coordinator: The person authorized by FSC to coordinate the development and approval of the FSC National Risk Assessment, including coordination and management of the NRA Working Group(s). The Coordinator is the main contact for FSC in the NRA development process.

FSC Controlled Wood: Material which has passed assessment for conformance with Controlled Wood requirements according to the standard *FSC-STD-40-005 Requirements for sourcing FSC Controlled Wood* or *FSC-STD-30-010 Forest management requirements for Controlled Wood certification*.

National decision body: The body that must approve the draft National Risk Assessment at the national level before it is submitted to FSC for final approval. Subject to requirements, it may be the Board of Directors of the relevant FSC Network Partner, the FSC Regional Director, or the members of the authorized National Risk Assessment Working Group that developed the National Risk Assessment.

National Risk Assessment (NRA): A designation of the risk of sourcing from 'unacceptable' sources in a given country or region, developed according to *FSC-PRO-60-002 Development and Approval of FSC National Risk Assessments*.

National Risk Assessment Working Group (NRA-WG): The technical body recognized by FSC and established for the purpose developing a National Risk Assessment for a given country or region in accordance with FSC requirements. The NRA-WG is not required to be an independent legal entity. It may be a committee or working group, representing the interests of the three FSC chambers: economic, social and environmental.

Responsible body: The entity responsible for NRA development and maintenance. It may be an FSC Network Partner, FSC Regional Office or the Controlled Wood Program of FSC International. The responsible body establishes the NRA-WG and submits the proposal to develop a NRA. The responsible body also collects relevant information on the NRA during its period of validity to assess the need for updating or revising the NRA, and amends the NRA when needed.

Verbal forms for the expression of provisions
[Adapted from *ISO/IEC Directives Part 2: Rules for the structure and drafting of International Standards*]

"*shall*": indicates requirements strictly to be followed in order to conform to the standard.

"*should*": indicates that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others, or that a certain course of action is preferred but not necessarily required. A certification body can meet these requirements in an equivalent way provided this can be demonstrated and justified.

"*may*": indicates a course of action permissible within the limits of the document.

"*can*": is used for statements of possibility and capability, whether material, physical or causal.

© 2014 Forest Stewardship Council A.C. All rights reserved.

PART I DEVELOPMENT OF A NATIONAL RISK ASSESSMENT

1 Scope of a National Risk Assessment

1.1 The risk assessment process and the content of the NRA shall follow the requirements specified in the Addendum of this procedure *FSC-PRO-60-002a FSC National Risk Assessment Framework*.

2 Working bodies and their roles and responsibilities

2.1 The body responsible for NRA development and maintenance ('responsible body') shall be:

a) An FSC Network Partner, or

b) The FSC Regional Office when an FSC Network Partner is not able to conduct the NRA process according to this procedure, or

c) FSC when neither an FSC Network Partner, nor FSC Regional Office are able to conduct the NRA process according to this procedure.

If for any reason the responsible body is no longer able to exercise this responsibility (e.g., if a Network Partner ceases to exist), FSC shall take direct control of the National Risk Assessment until a new responsible body is established.

2.2 As a first step in the development of an NRA, the responsible body shall establish a National Risk Assessment Working Group (NRA-WG) and appoint an NRA Coordinator, subject to 2.9.

2.3 The responsible body shall prepare Terms of Reference, to be agreed with the Coordinator and the NRA-WG before they are finalized. The Terms of Reference shall cover at minimum the elements specified in the proposal for NRA development (Section 3).

2.4 The NRA-WG shall conform to the requirements outlined in *FSC-STD-60-006* Section 4, including its composition, qualifications of members, support by technical experts and drafting (considering relevant Controlled Wood requirements). Additionally the members of the NRA-WG shall possess sufficient:

a) Capacity to professionally implement the requirements of this procedure;

b) Ability to participate in the NRA process free of any conflict of interest;

c) Competence and knowledge of the Controlled Wood system;

d) Knowledge of the country or region, and specifically its timber and forest sector.

NOTE: Existing Standard Development Groups registered by FSC are the preferred entities to take up the responsibilities of an NRA-WG.

2.5 The NRA-WG is responsible for risk assessment according to the relevant FSC requirements.

© 2014 Forest Stewardship Council A.C. All rights reserved.

2.6 The Coordinator is responsible for facilitating and managing the NRA process, including managing the NRA-WG, drafting the National Risk Assessment, and stakeholder consultation, according to the requirements of this procedure.

2.7 The Coordinator shall meet the requirements outlined in *FSC-STD-60-006*, Clause 3.2.

2.8 The Coordinator shall communicate with FSC throughout the NRA development process, including sending updates on the status of the NRA process to FSC at least every 3 months and/or at each stage determined in the timetable (see section 3), including:

a) Progress of the NRA process according to the timetable;

b) Identified problems that influence and/or may influence workflow;

2.9 Any working group that is independent from an FSC Network Partner and/or FSC Regional Office, interested in NRA development, and that meets the requirements outlined in Clause 2.3 shall contact the relevant FSC Network Partner and/or FSC Regional Office to seek opportunities for involvement in the NRA process, subject to Clause 2.11.

2.10 The relevant FSC Network Partner and/or FSC Regional Office shall respond to the independent working group regarding possibilities for NRA development with a justification for decisions made within 30 days.

2.11 In cases where an FSC Network Partner and/or FSC Regional Office does not support but does not oppose NRA development, a working group that is independent from an FSC Network Partner that meets the qualifications and requirements of an NRA-WG is authorized to appoint a Coordinator and submit a proposal for NRA development in a country or region not covered by a valid NRA, according to Section 3 of this procedure.

NOTE: Lack of support for NRA development by a Network Partner and/or Regional Office may be related to ongoing NRA processes, other registered working groups, limited capacity to take responsibility for NRA development, etc.

3 Proposal to develop a National Risk Assessment

3.1 A proposal to develop an NRA shall be submitted to FSC by the responsible body before the development of the NRA may begin, and shall include the following elements:

a) Objective;

b) Scope of the NRA, including geographical area and type(s) of forest;

c) Names, qualifications and contact details of the members of the NRA-WG and the Coordinator;

d) Timetable of the NRA process, including start date and tentative date of submission of the final draft to FSC;

e) Estimated budget and description of how funds have been or shall be secured;

© 2014 Forest Stewardship Council A.C. All rights reserved.

f) Identification of the responsible body and national decision body (see Section 6);

g) Opinion on the proposal issued by the relevant FSC Network Partner and/or FSC Regional Office in case a proposal is submitted by an authorized NRA-WG as per Clauses 2.9 and 2.10.

3.2 The proposal to develop an NRA shall be submitted in English or Spanish, using the template provided in Annex B.

NOTE: If there are differences between the different versions of the document, the English version is authentic.

3.3 Within two (2) weeks of receiving the proposal FSC will:

a) Confirm that the proposal has been approved; or

b) Reject the proposal, communicating the reasons for rejection.

NOTE: FSC may involve the relevant FSC Network Partner and/or FSC Regional Office in the evaluation of the proposal if it is submitted by an authorized working group.

3.4 FSC will publish information about NRA processes upon approval of new proposals on the Global Forest Registry (GFR) and the FSC website.

4 Drafting a National Risk Assessment

4.1 The NRA shall be drafted using the template provided in Annex C.

4.2 At minimum, the following draft versions shall be prepared:

a) A first draft to be publicly consulted (according to Section 5), which shall be sent to FSC in English or Spanish for review and approval prior to its first public consultation;

b) A final draft for submission to FSC, developed based on the input from stakeholder consultation.

NOTE: Draft NRAs may be pilot tested based on *FSC-POL-01-001 Policy for pilot tests of draft FSC standards*, in cooperation with FSC.

4.3 Each draft shall be considered complete once agreed so by the NRA-WG, including any outstanding concerns by members of the NRA-WG (see Clause 7.2.1 c).

4.4 Upon receipt, FSC will review the drafts within a maximum of thirty (30) working days, excluding the time needed for translation from Spanish to English or vice versa.

5 Stakeholder consultation

5.1 The NRA draft shall be publicly consulted to ensure the NRA's relevance to national/regional conditions and allow stakeholder contribution to the NRA process.

5.2 The Coordinator shall identify stakeholders according to Annex A, and shall invite them to comment on the draft NRA. The Coordinator shall ensure that stakeholders from all stakeholder groups listed in Annex A are invited to participate.

© 2014 Forest Stewardship Council A.C. All rights reserved.

NOTE: The Coordinator should consult with the NRA-WG, the FSC Network Partner and FSC-accredited certification bodies when identifying stakeholders.

5.3 The Coordinator shall maintain a list of identified stakeholders and their respective contact details.

5.4 The period during which stakeholders can submit comments on the first draft of the NRA is required to be at least sixty (60) days.

5.5 Information sent to stakeholders for consultation shall include the following:

a) A brief description of the FSC Controlled Wood system; including a reference to the standard *FSC-STD-40-005 Requirements for sourcing FSC Controlled Wood*;

b) A brief description of the purpose of the NRA, scope of the assessment and the objective of stakeholder consultation, including a request for comments;

c) The start and end dates of the stakeholder consultation period;

d) The draft National Risk Assessment;

e) The contact details of the Coordinator;

f) The estimated timeline for the completion of the proposed NRA;

g) A brief description of how, upon approval, the NRA will be maintained;

h) A statement that comments will be published unless confidentiality is requested;

i) A statement that the development process is in line with this procedure.

5.6 The Coordinator shall inform FSC about the start date of the consultation at least three (3) weeks in advance.

5.7 The Coordinator and the members of NRA-WG shall be proactive in seeking input from representatives of identified stakeholders, including using a variety of means to inform stakeholders, appropriate to the stakeholders being contacted.

NOTE: Techniques may include: face to face meetings, personal contact by phone or letter, notices published in the national and/or local press and on relevant websites, local radio announcements, announcements on local customary notice boards in the language of the local people, and emails in the language of the recipients. The Coordinator should consider holding stakeholder workshops to provide a forum for direct input and discussion.

NOTE: The Coordinator is responsible for facilitating culturally appropriate outreach to representatives of all identified Stakeholders.

5.8 The Coordinator shall acknowledge the receipt of comments and their proper collection.

5.9 The NRA-WG shall review all comments by stakeholders and address them in subsequent drafts with the goal of achieving consensus, in line with relevant FSC requirements, and FSC's vision and mission.

© 2014 Forest Stewardship Council A.C. All rights reserved.

5.10 The Coordinator shall respond to all stakeholders who participate in the consultation process and indicate how their comments were taken into account, at latest by the release of the NRA for a subsequent consultation period or its submission to FSC for approval.

5.11 The Coordinator shall prepare a stakeholder consultation report and present it to the NRA-WG for review. Any reservations expressed by the NRA-WG upon review shall be summarized in the report.

5.12 The consultation report shall include:

a) A summary of the issues raised and how they were addressed;

b) An analysis of the range of stakeholder groups who submitted comments;

c) An unedited copy of all comments as an Annex to the report.

NOTE: Copies of comments do not require translation from their original language.

5.13 The Coordinator shall send the stakeholder consultation report to FSC in English or Spanish at latest by the release of the NRA for a subsequent consultation period or its submission to FSC for approval.

5.14 The consultation report shall be made publicly available with the exception of comments from stakeholders who have demanded that their comments be treated as confidential. Publication on websites used for communication about the NRA process is required, whenever such websites exist.

NOTE: Means of public availability should be determined based on national/regional conditions.

5.15 The need for additional consultation periods prior to the development of the final draft shall be at the discretion of the NRA-WG, taking into account the comments received during the public consultation. The period for consultation rounds following the first draft may be limited to thirty (30) days.

6 National approval process

6.1 The final draft NRA shall be approved at the national level by the national decision body prior to being submitted to FSC for final decision-making.

6.2 The national decision body shall either be:

a) The Board of Directors of the relevant FSC Network Partner involved in the NRA process; or when an FSC Network Partner is not involved:

b) The FSC Regional Director submitting the proposal for NRA development based on the recommendation by the NRA-WG; or

c) Members of an authorized NRA-WG developing the NRA.

NOTE: Option c relates to cases outlined in Clause 2.11

6.3 When approving the final draft NRA the national decision body shall check the implementation of the applicable requirements of this procedure to ensure they have

© 2014 Forest Stewardship Council A.C. All rights reserved.

been followed correctly but shall not evaluate the risk designations agreed by the NRA-WG. Specific concerns regarding risk designations may be communicated to FSC separately.

© 2014 Forest Stewardship Council A.C. All rights reserved.

PART II EVALUATION AND APPROVAL OF A NATIONAL RISK ASSESSMENT

7 Evaluation of a National Risk Assessment

7.1 Once approved at the national level, the final draft NRA shall be sent to FSC for decision making.

7.2 The application for approval shall include a signed application letter from the representative of the national decision body confirming national approval, as well as:

a) A summary of the development process, including any deviations from the original work plan or from procedures;

b) An evaluation of the likely impacts of the NRA (e.g., influence on the performance of the Controlled Wood system within the area covered by the NRA, administrative and other costs in relation to certificate holders and certification bodies, etc.);

NOTE: The evaluation should be based on the knowledge of the NRA-WG and stakeholders consulted through the process and does not require separate impact studies to be conducted.

c) A record of any outstanding concerns by members of the NRA-WG (e.g., lack of consensus on a specific issue);

d) The final draft NRA in English or Spanish signed-off by the NRA-WG and the Coordinator;

NOTE: If there are differences between the different versions of the document, the English version is considered authentic.

e) A copy of the stakeholder consultation report(s);

f) A list of all stakeholders contacted for the consultation periods.

NOTE: The application may include any other evidence that the applicant deems relevant to demonstrate compliance with the requirements specified in this procedure (e.g., minutes of meetings).

NOTE: Incomplete applications will not be processed until completed.

7.3 FSC will evaluate complete applications for compliance with the applicable process and content requirements. Annex D will be used to perform the evaluation.

8 Approval of a National Risk Assessment

8.1 Within thirty (30) days of receiving the complete application (excluding time needed for translation from Spanish to English or vice versa), the FSC Policy and Standards Director will take a decision to:

a) Approve the NRA, or

b) Reject the NRA, with rationale for why it was rejected and suggestions for actions needed to address the concerns.

© 2014 Forest Stewardship Council A.C. All rights reserved.

8.2 The decision will be communicated to the national decision body and to the Coordinator.

8.3 Upon approval, FSC will publicly announce the NRA and publish it on the FSC website and on the Global Forest Registry.

8.4 Approved NRAs remain valid for a period of five (5) years from the approval date.

© 2014 Forest Stewardship Council A.C. All rights reserved.

PART III MAINTENANCE OF A NATIONAL RISK ASSESSMENT

9 Evaluation of information

9.1 The responsible body shall collect information related to the NRA (e.g., enquiries, comments and/or proposals for NRA revision, etc.) during its period of validity.

9.2 The information received shall be evaluated by the responsible body as it is collected to establish the need for:

a) Updating the NRA when there is no change in risk determination and/or risk mitigation means, or

b) Revising the NRA when a change in risk determination and/or risk mitigation means (Control Measures) are required or likely.

10 Review and revision of a National Risk Assessment

10.1 Updates of the NRA shall be implemented according to needs and at least every 5 years. In case of an update, the NRA shall be given a new, 2nd level version number (e.g., V1-1, V1-2) by the responsible body.

NOTE: Update(s) may include but are not limited to: update of links of information sources, adding information sources and maps and amending typographic or translation mistakes.

10.2 The updated NRA shall be sent to FSC for approval, along with an application letter including a description and justification for changes made.

10.3 The revision process shall be conducted in accordance with the requirements for NRA development outlined in Part I, except for urgent revision according to Clause 10.4. For each revision of the NRA a new 1st level version number shall be given (e.g., V2-0, V3-0).

10.4 In cases when there is clear and undisputable evidence requiring a change of risk determination and/or change of mandatory risk mitigation means, the responsible body shall amend the NRA accordingly.

NOTE: Examples of clear and undisputable evidence may include but are not limited to: changes in legislation, results of complaints handled at the international level and newly published scientific evidence.

10.5 An NRA amended under urgent revision shall be sent to FSC for approval, along with an application letter, which includes a description of evidence and justification for changes made. The application letter shall include information about the urgent mode of the review.

10.6 By no later than 6 months prior to the end of the validity period of the NRA, the body responsible for NRA maintenance shall submit a report summarizing the results and conclusions of the ongoing review process to FSC. The report shall include a recommendation as to whether the NRA merits re-approval by FSC.

10.7 FSC shall make a decision regarding re-approval and communicate it accordingly

© 2014 Forest Stewardship Council A.C. All rights reserved.

PART IV ADDITIONAL REQUIREMENTS

11 Intervention mechanism

11.1 In cases where the process of NRA development cannot be completed by the responsible body, FSC is entitled to take over NRA development and/or revision, including the re-establishment of an NRA-WG and/or appointment of a Coordinator.

NOTE: Such cases may include but are not limited to the following situations: lack of contact/cooperation between working bodies and FSC, unjustified changes in the timetable of the process, and when stakeholder consultation is targeted at a limited group of stakeholders.

11.2 FSC is entitled to conduct an NRA internationally in cooperation with external bodies which have the required expertise in Controlled Wood categories. This includes situations where no Network Partner exists or when it is not capable of conducting the NRA in a timeframe adequate to ensure sufficient performance of the Controlled Wood system.

11.3 FSC will inform the responsible body in writing if a pending NRA process is to be continued centrally. Before FSC takes the responsibility for an NRA, all attempts will be made to solve any issues in mutual dialogue between FSC and the responsible body.

11.4 FSC may invalidate an NRA in full or in part as the result of a complaints process or evidence that a review/revision process was not carried out in accordance with the requirements outlined in this procedure.

12 Complaints and disputes related to National Risk Assessments

12.1 The NRA shall describe a mechanism for handling complaints or disputes related to NRA development and maintenance.

12.2 The documented mechanism of handling complaints shall aim to achieve solutions at the national/regional level, and shall be based on *FSC-PRO-01-009 Processing formal complaints in the FSC certification scheme.*

12.3 The minimum requirements to be included in the complaints mechanism are:

a) Acknowledgment of complaints within two (2) weeks of receipt of a complaint;

b) The scope and timeframe of a complaint verification process to be followed by the responsible body;

c) Conditions under which a complaint shall proceed according to *FSC-PRO-01-009 Processing formal complaints in the FSC certification scheme*;

d) A complaint registry, including recording and filing of all complaints received, actions taken and results of complaint evaluations;

e) Procedures for informing the complainant of the results of the complaint and any actions taken towards its resolution.

© 2014 Forest Stewardship Council A.C. All rights reserved.

Annex A Stakeholder groups to be consulted in the NRA process

Stakeholders representing the interests listed below shall be identified and notified during the process of NRA development. Each group specified may be represented by an unlimited number of representatives, provided chamber balanced input into NRA process is maintained. The list is not comprehensive and any other Stakeholder groups relevant for the NRA process under national/regional conditions shall be identified and notified (see Section 5).

1. Economic interests

    a) Forest owners and/or managers of large, medium and small forests; high-, medium- and low-intensity managed forests;

    b) Forest contractors (including loggers);

    c) Representatives of forest workers and forest industries;

    d) Certificate holders;

2. Social interests

    a) NGOs involved or with an interest in social aspects of forest management and other related operations;

    b) Forest workers;

    c) International, national and local trade/labor unions;

    d) Representatives of local communities involved or with an interest in forest management, including those relevant for HCVs 5 and 6;

    e) Representatives of indigenous peoples and/or traditional peoples (if present and/or holding rights), including those relevant for HCVs 5 and 6;

    f) Representatives of recreation interests.

3. Environmental interests

    a) NGOs involved or with an interest in the environmental aspects of forest management. Consultation should target the following areas of interest and expertise:
        - Biological diversity
        - Water and soil
        - Environmental-related High Conservation Values

    b) Local communities and indigenous peoples' representatives (HCVs 5 and 6);

4. FSC-accredited certification bodies active in the country;

5. National and state forest agencies;

6. Experts with expertise in Controlled Wood categories;

© 2014 Forest Stewardship Council A.C. All rights reserved.

7. Research institutions and universities;

8. FSC Regional Offices, FSC Network Partners, registered Standard Development Groups and NRA Working Groups in the region[2].

[2] Africa, Asia and Pacific, Europe and Russia (CIS), Latin America and North America (as of 2014).[3] Information on resources and their availability to date of sending the proposal

© 2014 Forest Stewardship Council A.C. All rights reserved.

Annex B Proposal for NRA development template

Proposal for development/revision of the FSC National Risk Assessment for (country/region)

© 2014 Forest Stewardship Council A.C. All rights reserved.

Place/date

Recipient:

FSC International Center GmbH
Policy and Standards Unit
Program Manager (Controlled Wood)

Proposal submitted by:
Name and contact details of the Applicant

Applicant introduces the proposal for NRA development/revision for *country/region*, according to the latest version of *FSC-PRO-60-002.*

Contents

1. Objective
2. Scope of the risk assessment
3. Composition and qualifications of NRA Working Group
4. Coordination
5. Responsible body and national decision body
6. Timetable and budget
7. Existing Controlled Wood risk assessments (optional)
8. Miscellaneous (optional)

Annex B1 Terms of Reference of the Working Group and the Coordinator

Evaluation of the proposal (FSC)

Opinion on the proposal by the relevant FSC Network Partner (NP) and/or FSC Regional Office (RO) (applicable for an Applicant other than NP/RO):

……

1. Objective

Assessment of risk of sourcing wood from 'unacceptable' sources as outlined by the five Controlled Wood categories in *name of the country/region*, according to the risk assessment requirements specified in *FSC-PRO-60-002a FSC National Risk Assessment Framework*.
(Additional information on stakeholder interest in NRA development and drivers towards NRA are recommended. When applying for FSC funds to support NRA development, this information is required).

2. Scope of the risk assessment

Description of the geographical scope of risk assessment: specification of country or description of region(s) under assessment.

3. Composition and qualifications of the NRA Working Group

Name, qualifications and contact details of the members of the National Risk Assessment Working Group (in the table), and brief description of how the requirements of Section 4 of FSC-STD-60-006

© 2014 Forest Stewardship Council A.C. All rights reserved.

Process requirements for the development and maintenance of National Forest Stewardship Standards *have been met. If the NRA is going to be developed by an existing, registered SDG, please provide this information and date of registration. Please specify the language of the NRA-WG.*

NRA-WG members

Name	Membership chamber	Qualifications	Contact details

4. Coordination

Name, qualification and contact details of the Coordinator appointed to manage the NRA process. The main means of contact with FSC shall be specified.
This person coordinates the Working Group and is the main contact representing the responsible body (e.g., RO) and FSC.

5. Responsible body and national decision body

a) Specification of the 'responsible body' that the applicant is representing, according to Clause 2.1.
b) Identification of the national decision body according to Clause 6.2.

6. Timetable and budget

Main activities	Expected date (Month, Year)	Comments	Expected costs and indication of funds[3]
Start of the process			
First draft development			
First draft submission to FSC			N/A
Public consultation on 1st draft[4]		min. 60 days since publication	
Stakeholder meeting (optional)			
Stakeholder feedback analysis			
Second draft development and consultation (optional)			
Final draft development			
Final draft submission to FSC			N/A
Implementation of required amendments (if any)			
Expected approval of the NRA			N/A
Total sum			

[3] Information on resources and their availability to date of sending the proposal
[4] FSC approval for draft contents is required prior to consultation

© 2014 Forest Stewardship Council A.C. All rights reserved.

7. Existing Controlled Wood risk assessments (optional)

General overview of existing risk assessments (where and when relevant) for the country/region based on information available on info.fsc.org. Detailed analysis is not required in this section.

8. Miscellaneous (optional)

Additional information provided by the Applicant

Annexes

Terms of Reference as per Clause 2.3;
Other Annexes

Approved by ……..
(National decision body)

Evaluation of the proposal (FSC)

Decision:

☐ Approval

Date:
Approved by: Name and function

☐ Rejection

Reason for rejection:

General comments:

© 2014 Forest Stewardship Council A.C. All rights reserved.

Annex C National Risk Assessment template

FSC National Risk Assessment

For …… (Country/region)

DEVELOPED ACCORDING TO PROCEDURE FSC-PRO-60-002 V 3-0

Version	V 1-0
Code	CWNRA-XX-V1-0 (XX-code of the country, e.g., DE, V-version)
National approval	National decision body: Date:
International approval	FSC International Center: Policy and Standards Unit Date:
International contact	Name: Email address:
Period of validity	Date of approval: Valid until: (date of approval + 5 years)
Body responsible for NRA maintenance	Name, contact details

Summary of risk for XX *(specify country/region)*

Controlled Wood categories		Risk level (including functional scale when relevant)
1	Illegally harvested wood	
2	Wood harvested in violation of traditional and human rights	
3	Wood from forests where high conservation values are threatened by management activities	
4	Wood from forests being converted to plantations or non-forest use	
5	Wood from forests in which genetically modified trees are planted	

© 2014 Forest Stewardship Council A.C. All rights reserved.

Contents

1. Background information
2. List of experts involved in the risk assessment and their contact details
3. National Risk Assessment maintenance
4. Complaints and disputes regarding the approved National Risk Assessment
5. List of key stakeholders for consultation
6. Risk assessment (for each area under assessment)
   - 6.1. Category 1: Illegally harvested wood
   - 6.2. Category 2: Wood harvested in violation of traditional and human rights
   - 6.3. Category 3: Wood from forests where high conservation values are threatened by management activities
   - 6.4. Category 4: Wood from forests being converted to plantations or non-forest use
   - 6.5. Category 5: Wood from forests in which genetically modified trees are planted

Annex C1 List of information sources
Annex C2 Identification of applicable legislation

1. Background information

This section shall summarize NRA development, including but not limited to information about:

- Timeline of the NRA development
- National Risk Assessment Working Group
- Consultation conducted on drafts of the NRA (including main issues raised and how they were addressed)

2. List of experts involved in the risk assessment and their contact details

Names, qualification and contact details of the experts involved in the NRA development associated with information about Controlled Wood category expertise.

3. National Risk Assessment maintenance

In this section the responsible body (see Section 2) shall be indicated and information on how the NRA will be reviewed shall be specified (see Section 10).

4. Complaints and disputes regarding the approved National Risk Assessment

This section shall describe steps to be taken by the responsible body in the case that complaints and disputes exist regarding the NRA (see Section 12).
How complaints may be sent to the responsible entity shall be specified.
In the case of a revised NRA, a summary of the performance of any existing complaint mechanisms shall be included.

5. List of key stakeholders for consultation

In this section the list of key stakeholders shall be provided, indicating those who were contacted and those who participated in the consultation process for the NRA, according to Annex A.

© 2014 Forest Stewardship Council A.C. All rights reserved.

6. Risk assessment (for each area under assessment)

This section shall describe the process of risk assessment as specified in the National Risk Assessment Framework for each Controlled Wood category and for each prescribed indicator. All sources of information used during risk assessment shall be provided in an Annex to the NRA.

For each category the following scope shall be provided:

- Summary of risk assessment (main issues relevant for the assessed area, difficulties, special considerations, etc.)
- Justification of risk designation based on information sources used
- Justification of the functional scale applied
- Risk specification, including justification and the established Control Measures for 'specified' risk areas.

Area under assessment: *(e.g., Germany)*
(Provide a description of the area under assessment within the geographical scope covered by the NRA)

6.1 Category 1: Illegally harvested wood

Summary of risk assessment process: …

General/contextual information used for the risk assessment, referencing the number of any specific sources used (Annex C1): …
The country is ranked in the top 10 countries worldwide for (lack of) perceived corruption (1).
The country is ranked very highly for all World Bank Worldwide Governance Indicators (2).

For applicable legislation see Annex C2

© 2014 Forest Stewardship Council A.C. All rights reserved.

Indicator	Source of information (linked with Annex C1)	Indication of risk, evidence used	Functional scale	Risk designation and specification (if not 'low risk') Provide numbers of thresholds[5] that are met and justify the outcome for each threshold	Control Measures M – mandatory R – recommended
Example 1					
1.1 Land tenure and management rights.	*3*	*Low risk - Land and management rights are well defined by legislation and there is a system for the issuance of management licenses.*	*No functional scale used*	*Low (Threshold 1):* *Land and management rights are clearly defined in legislation. Sources confirm enforcement of these laws (general assessment of law enforcement based on international indicators and lack of evidence of violation of these laws).*	
	4	*Low risk – The assessment of the provision of management rights according to the legislation has been very positively assessed.*			
1.2 Concession licenses.	*3*	*Low risk (public forests) - Concession licenses are consistently provided within the required timeframes in public forests.* *Specified risk (private forests) - Licenses used for harvesting in private forests are often delayed so that harvesting is occurring before licenses are issued or using outdated licenses which haven't been renewed.*	*Ownership:* *'Specified risk' – private forest;* *'Low risk' – other forests.*	*Specified (Threshold 2)* *Reports cited provide information that although there is no violation of regulations about planning and management, required concession licenses are often issued with a delay and outdated. This problem mainly has only been documented in private forests.*	*R - Where concession is required, sourcing from forest areas with valid concession license.*
	5	*Specified risk (private forests) - Some cases of illegal logging occur in private forests as a result of concession licenses not being granted.*			
Example 2					
1.14 FPIC	*5*	*Specified risk – Traditional rights for forest access are shown to rarely be upheld – due to poor definition of rights in the relevant legislation (list laws). Numerous examples are documented showing poor enforcement of the rights that are included in the relevant legislation.* *Reports indicate that traditional laws are violated in terms of access to the forest.*	*Presence of indigenous peoples:* *'Low risk' for area not occupied by indigenous peoples;* *'Specified risk' for area occupied by indigenous peoples (keep consistency*	*Specified (Threshold 2)* *Indigenous peoples' rights are inconsistently described in existing legislation. There are indications that rights of forest access for indigenous peoples are violated.*	*M - Documentation confirms FPIC implementation in sourcing area. (keep consistency with Cat. 2 assessment)*

[5] See threshold numbers provided in the NRAF.

© 2014 Forest Stewardship Council A.C. All rights reserved.

	6	*Specified risk - Indigenous rights are not clearly and consistently described in the legislation. Legislation is poorly written resulting in lack of clarity.*	*with cat. 2 assessment)*		
1.15 Indigenous Peoples rights	*5, 6*	*Specified risk – See evidence from sources 5 and 6 for indicator 1.14*	*Presence of indigenous peoples: 'Low risk' for area not occupied by indigenous peoples; 'Specified risk' for areas occupied by indigenous peoples (keep consistency with cat. 2 assessment)*	*Specified (Threshold 2) Indigenous peoples' rights are inconsistently described in existing legislation.*	

6.2 Category 2: Wood harvested in violation of traditional and human rights

Summary of risk assessment process: …

General/contextual information used for the risk assessment, referencing the number of any specific sources used (Annex C1): …

Indicator	Source of information (linked with Annex C1)	Indication of risk, evidence used	Functional scale	Risk designation and specification (if not 'low risk') Provide numbers of thresholds that are met and justify the outcome for each threshold	Control Measures M – mandatory R – recommended
Example 1					
2.3. The rights of indigenous and traditional peoples are upheld.	*Legality assessment (see Category 1);*	*See indication and evidence for indicators 1.14 and 1.15.*	*Presence of indigenous peoples: 'Low risk' for areas not occupied by indigenous peoples; 'Specified risk' for areas occupied by indigenous peoples*	*Specified (Threshold 22): See risk specification for indicators 1.14 and 1.15.*	*M - Documentation confirms FPIC implementation in sourcing area.*
Example 2					
2.3. The	*Applicable*	*See indication and evidence for indicators*	*Presence of*	*Specified (Threshold 24):*	*M - Documentation*

© 2014 Forest Stewardship Council A.C. All rights reserved.

rights of indigenous and traditional peoples are upheld.	*legislation (see Category 1);*	*1.14 and 1.15.*	*indigenous peoples: 'Low risk' for area not occupied by indigenous peoples; 'Specified risk' for area occupied by indigenous peoples*	*Confirmed presence of indigenous peoples in the northern part of the area. There are no laws nor regulations, or other practices ensuring respect of traditional laws and NGO report provides evidence of these violations of laws. Sources challenging NGO findings do not provide sufficient counter-arguments against report findings. Expert overview shows that indigenous peoples' rights are inconsistently described in existing legislation. Reports of RIIA indicate that traditional laws are violated in terms of access to the forest.*	*confirms FPIC implementation in sourcing area.*
	7	*No risk indication – Source documents the presence and territories of indigenous peoples.*	*As above*		

6.3 Category 3: Wood from forests in which high conservation values are threatened by management activities

Summary of risk assessment process: …

General/contextual information used for the risk assessment, referencing the number of any specific sources used (Annex C1): …

HCV category and indicator	Data used for HCV identification (linked with Annex C1)	Identified threats (provide sources[6], linked with Annex C1)	Indication of risk, evidence used	Functional scale	Risk designation and specification (if not 'low risk') Provide numbers of thresholds that are met and justify the outcome for each threshold	Control Measures M – mandatory R – recommended
Example1						
HCV 1 – 3.1	*8, 9, 10*	*Habitat removal (8, 10))*	*Specified risk – HCV inventory data (8) records HCV presence and geographical coverage and its maps provide evidence of habitat removal of protected species in some forest areas. Threatened species recovery plan implementation report*	*'Low risk': Public state forest (identified risk is mitigated by internal code of practice and existing evidence confirms that code is upheld). 'Specified risk': rest of the area.*	*Specified (Threshold 8): Management regulations do not require protection of breeding sites of relevant species. Within the area species XX requires seasonal protection but habitats of these species are being removed. Country is signatory to CBD but reports show little progress in achieving CBD targets. The problem does not occur within the areas*	*R - Sourcing from areas where seasonal birth sites are not logged during breeding season; Ex. Of verifiers: agreements with forest managers that*

[6] Provide justification for why only these sources were used in the assessment.

© 2014 Forest Stewardship Council A.C. All rights reserved.

			(10) states that this is not a problem in protected areas (confirmed by HCV maps) due to application of code of conduct (11).		*of nature protection (particularly: national parks and reserves) and in the forest areas managed by public state forest due to internal regulation*	*confirm CM implementation.*

Category 4: Wood from forests being converted to plantations or non-forest use

Summary of risk assessment process: …

General/contextual information used for the risk assessment, referencing the number of any specific sources used (Annex C1): …

Indicator	Source of information (linked with Annex C1)	Indication of risk, evidence used	Functional scale	Risk designation and specification (if not 'low risk') Provide numbers of thresholds that are met and justify the outcome for each threshold	Control Measures M – mandatory R – recommended
Example 1					
4.1 (…)	*Legality assessment (see Category 1); 11*	*Act XXXX (Specify) explicitly outlaws the clearance of forest ecosystems, except in the specific cases include under "investments of public priority", which covers infrastructure development by the Federal government. [Include relevant text from the legislation]*	*Not applied*	*Low (Threshold 2): Legislation only allows for removal of forest ecosystems (including conversion to plantation) for the purpose of investments of public priority (high speed road development, establishing of water bodies serving as means for fire-protection and water supply, etc.). Clear cuts are allowed in the legislation but regeneration of felled areas is required in time short enough to protect ecosystem values from degradation. Category 1 assessment confirms law enforcement.*	
Example 2					
4.1 (…)	*12*	*Low risk - The "National Forest Inventory and Mapping Program", indicated that all jurisdictions within the area under assessment experienced an increase in forest area in the period 2009-2013. [Quote and reference relevant conclusions*	*Not applied*	*Low (Threshold 1): Spatial data available on the database confirm that spatial threshold in the indicator is met. Additionally, governmental reports (past 5 years) dealing with land cover changes confirms that conversion does not*	

© 2014 Forest Stewardship Council A.C. All rights reserved.

		from Program's report]		*exceed the threshold.*	
	13	*Low risk – Provincial reports of public and forest cover showed there was no absolute loss of forest cover. [Quote and reference relevant statistics from Program's report]*			

Category 5: Wood from forests in which genetically modified trees are planted

Summary of risk assessment process: …

General/contextual information used for the risk assessment, referencing the number of any specific sources used (Annex C1): …

Indicator	Source of information (linked with Annex C1)	Indication of risk, evidence used	Functional scale	Risk designation and specification (if not 'low risk') Provide numbers of thresholds that are met and justify the outcome for each threshold	Control Measures M – mandatory R – recommended
Example1					
5.1 (…)	*Legality assessment*	*Low risk - Law XXXX, clearly bans the use of GMOs in the country.*	*Not applied*	*Low (Threshold 1) Introduction of GM trees to forest areas is forbidden according to the law. Category 1 assessment confirms law enforcement.*	

© 2014 Forest Stewardship Council A.C. All rights reserved.

Annex C1 List of information sources

Provide all sources of information used during the risk assessment process, including those provided in FSC-PRO-60-002a.

No.	Source of information	Relevant indicator(s) or CW category
1	*Transparency International http://www.transparency.org/policy_research/surveys_indices/cpi for Transparency International indices;*	*1*
2	*World Bank Worldwide Governance Indicators: www.govindicators.org*	*1*
3	*NGO report on issuing and controlling of licensing and planning (available at: …)*	*1.2, 1.3, 1.4*
4	*Government report on land management and rights (NGO, available at….)*	*1.1*
5	*Royal Institute of International Affairs (RIIA): www.illegal-logging.info (provide directory to relevant report!);*	*1.14*
6	*Expert overview on laws regulating traditional rights (report: …).*	*1.14, 1.15*
7	*NGO report about nomads entering region covered by the area under assessment. ILO database (…)*	*2.3*
8	*HCV Inventory Data*	*3.1*
9	*Threatened species recovery plan 2013*	*3.1*
10	*Threatened species recovery plan implementation report 2014*	*3.1*
11	*Act of forest ….; Code of practice of Public State Forest 2012*	*4.1*
12	*Spatial database of relevant forest areas*	*4.1*
13	*Land cover reports*	*4.1*

© 2014 Forest Stewardship Council A.C. All rights reserved.

Annex C2 Identification of applicable legislation

Provide a list or reference to the existing list of applicable legislation as required by *FSC-PRO-60-002a FSC National Risk Assessment Framework* for each area under assessment.

Identified applicable legislation or relevant references shall be provided at least for each law sub-category specified in table 1 in the *FSC-PRO-60-002a FSC National Risk Assessment Framework* (Legal rights to harvest, taxes and fees, timber harvesting, third parties' rights, trade and transport, diligence/due care). Whenever possible, applicable legislation shall be provided for indicators included in the law sub-categories. Justification shall be provided when level of indicator is not achieved.

Laws and regulation identified above that are relevant for: labor rights, the rights of indigenous and traditional peoples, conversion of forest to plantation and/or non-forest use, as well as use of GM trees shall be identified for each of these.

© 2014 Forest Stewardship Council A.C. All rights reserved.

Annex D Risk Assessment evaluation template (informative)

Evaluation of the National Risk Assessment for FSC Approval

Name of Applicant	
Geographical scope of the NRA	
NRA code	
Contact Information of Coordinator	
Date of application to FSC	
Date of evaluation by FSC	
Evaluator	
Resubmission	(dates)

This checklist details the content and process requirements to be evaluated by FSC in the evaluation process of risk designations conducted according to *FSC-PRO-60-002 V 3-0*.

A FORMAL REQUIREMENTS

1.1 Proposal for National Risk Assessment

REQUIREMENT	YES	NO	COMMENT
Proposal submitted in English/Spanish			(Date of proposal approval)
Objective			
Scope of the risk assessment			
Composition and qualifications of NRA Working Group			
Coordination			
Timetable and budget			
Responsible body and national decision body			
Timetable and budget followed?			
Others			

1.2 Drafting

REQUIREMENT	YES	NO	COMMENT
Number of drafts developed (sufficient?)	-	-	
FSC notified prior to consultation?			
All required sections are included?			

1.3 Final submission

REQUIREMENT	YES	NO	COMMENT
Application letter			
Approval by national decision body			
Stakeholder consultation report			
National Risk Assessment (compare B)			
Approval by NRA Working Group			
Other documents (specify)			

© 2014 Forest Stewardship Council A.C. All rights reserved.

1.4 Other issues

Describe any other formal issues

B PROCESS AND CONTENT REQUIREMENTS

2.1 Working bodies

Cooperation with Applicant during NRA development; eventual comments on qualifications of the working bodies.

2.2 Stakeholder representation

STAKEHOLDER GROUP	YES	NO	COMMENT
Economic			
Owners/managers of large and medium MUs			
Owners/managers of SLIMFs			
Forest contractors			
Representatives of forest workers			
Representatives of forest industries			
Certificate holders			
Social			
NGOs (social aspects)			
Trade/labor unions			
Forest workers			
Representatives of indigenous/traditional peoples/local communities			
Representatives of recreation interests			
Environmental			
NGOs (environmental aspect)			
Representatives of local communities (HCV 5)			
Representatives of indigenous peoples (HCV 6)			
FSC-accredited certification bodies active in the country			
National and states forest agencies			
Experts			
Research institutions/Universities			
FSC Regional Offices, FSC Partners, registered Working Groups			

2.3 Stakeholder consultation

REQUIREMENT	YES	NO	COMMENT
Means of consultation adequate?			
Consultation period(s) long enough?			
FSC notified prior to consultation?			
Report submitted in (language), including:			
summary of the issues			
analysis of comments			
responses to the comments			
consideration of comments			
annexed copy of formal comments			
Other (specify)			

© 2014 Forest Stewardship Council A.C. All rights reserved.

2.4 National Risk Assessment

REQUIREMENT	YES	NO	COMMENT
Submitted in (language), including:			
Geographical scope determination			
Identification of area(s) under assessment			
Process steps for each indicator			
Sufficient sources of information			
Adequate scale of the assessment			
All risk determinations follow requirements and are justified with evidence			
Risk specification corresponds with scale and Control Measures			
Control Measures are formulated correctly			

Describe main issues raised during evaluation of the final draft of the NRA

C FSC DECISION

Date:
Name (Policy and Standards Director):

☐ Approved

☐ Rejected

Reason for rejection:
Suggestions on the steps necessary to address concerns raised:

D RESUBMISSION

Repeat evaluation for relevant parts A-C

© 2014 Forest Stewardship Council A.C. All rights reserved.

Annex E Process guidance on developing a National Risk Assessment (informative)

Step 1: Project initiation

- Determine the Coordinator and NRA Working Group to provide oversight, management and decision-making of and to the process
- Establish a clear Terms of Reference
- Develop a methodology and work-plan
- Submit a proposal to FSC
- Develop a communications plan to keep stakeholders informed of the process

Step 2: Training

- Arrange for key personnel to receive training on the Controlled Wood system, and the process for developing a National Risk Assessment
- Contact FSC for information on training opportunities and materials

Step 3: Data gathering (this may be implemented by a technical expert and/or consultant)

- Review the content of the National Risk Assessment Framework (Addendum a), and gather information based on sources referenced for each category
- Review data provided per country on the Global Forest Registry (www.globalforestregistry.org)
- Determine sources relevant for the area under assessment
- Consult with stakeholders on issues where data is missing or may be inadequate

Step 4: Develop Draft 1 (use the template provided in Annex C)

- This may be done by an NRA Working Group alone or through a workshop targeted at key stakeholders from each Chamber, with the goal of gathering input on each risk assessment indicator
- The draft will be reviewed and approved upon by the Working Group
- Send the draft for FSC peer-review prior to the first consultation
- In case of unresolved issues, formulate direct questions for public consultation

Step 5: Stakeholder consultation (min. 60 days)

- Identify and notify stakeholders prior to consultation
- Circulate the draft and supplementary information to stakeholders
- Engage the NRA Working Group in a review of the feedback received from stakeholders and in feedback evaluation
- Decide on the 2nd/Final draft development
- Prepare a consultation report and send it to FSC

Step 6: Develop X/Final Draft (use the template provided in Annex C)

- This may be done by an NRA Working Group alone or through a workshop targeted at key stakeholders from each Chamber, with the goal of gathering input on each risk assessment indicator
- The draft will be reviewed and agreed upon by the NRA Working Group
- Seek external support (e.g., from FSC Policy and Standards Unit) on any outstanding issues

Step 8: Stakeholder consultation (and development of subsequent drafts if needed)

Step 9: National-level approval

- NRA Working Group approves final draft
- National decision body approves final draft

Step 10: International-level approval

- Submit the application for approval to FSC
- FSC approves the final version (if it meets requirements)

© 2014 Forest Stewardship Council A.C. All rights reserved.

- FSC posts the approved NRA on the FSC webpage and Global Forest Registry