



Forest Stewardship Council®

## FSC® PROCEDURE

### The Development and Approval of Controlled Wood National Risk Assessments

FSC-PRO-60-002 V 3-0 EN



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**DRAFT 2-0**

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.

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## A Objective

The objective of this procedure is to provide a clear, transparent, and unambiguous methodology for developing, maintaining, revising, evaluating, and approving National Risk Assessments (NRAs) for 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 be followed by authorized entities to develop, maintain and revise National Risk Assessments. It also specifies requirements and procedures for FSC International Center (IC) 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 Controlled Wood using *FSC-STD-40-005 Requirements for sourcing Controlled Wood*.

## C Effective and validity dates

Approval date	Target: September 2014
Publication date	Target: 01 October 2014
Effective date	Target: 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Period of validity	until 31 December 2019 (or until replaced or withdrawn)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-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*  
*FSC-PRO-01-009 Processing formal complaints in the FSC certification scheme*

## 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 Controlled Wood*, and the following apply:

**Centralized National Risk Assessment (CNRA):** National Risk Assessment or part thereof developed centrally by FSC International Center.

**Controlled Wood (CW):** Material that has been assessed to be in conformance with the requirements of the standard *FSC-STD-40-005 Requirements for sourcing Controlled Wood* or the requirements of the standard *FSC-STD-30-010 Forest management requirements for Controlled Wood certification* to avoid 'unacceptable' sources. (Source: *FSC-STD-40-005 Requirements for sourcing Controlled Wood*)

**Coordinator:** The person authorized by FSC to coordinate the development and approval of the FSC Controlled Wood 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.

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

**National Risk Assessment Working Group (NRA-WG):** The technical body recognized by FSC and established for the purpose of the development of a National Risk Assessment for a given country/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.

### 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.

## 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 National Risk Assessment (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 an FSC Network Partner or the FSC Regional Office or FSC<sup>1</sup>. 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 a NRA, the responsible body shall establish a National Risk Assessment Working Group (NRA-WG) and appoint a NRA Coordinator, subject to 2.8.

NOTE: the Coordinator can be, but does not have to be a member of the NRA-WG.

- 2.3 The NRA-WG shall conform to the requirements outlined in *FSC-STD-60-006* Section 4, including the NRA-WG composition, qualifications, support by technical experts and drafting (considering relevant CW 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 Controlled Wood;
- d) Knowledge of the country, and specifically the timber and forest sector;

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

- 2.4 The NRA-WG is responsible for risk determination according to the relevant FSC requirements.
- 2.5 The Coordinator is responsible for facilitation and managing the NRA process, including managing the NRA-WG, drafting the National Risk Assessment, and stakeholder consultation, according to requirements of this procedure.
- 2.6 Facilitation of the NRA process shall conform to the requirements outlined in *FSC-STD-60-006* Section 3.

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<sup>1</sup>Throughout this procedure, 'FSC' refers to the Controlled Wood Program of the FSC Policy and Standards Unit in the FSC International Center.

2.7 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 on 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;

2.8 Any standalone working group that meets the requirements outlined in Clause 2.3 (above) interested in NRA development shall contact the relevant FSC Network Partner and/or FSC Regional Office to seek opportunities for involvement in the NRA process, subject to Clause 2.9.

2.9 In cases where a FSC Network Partner and/or FSC Regional Office does not support NRA development, a standalone working group is authorized to appoint a Coordinator and submit a proposal for NRA development in countries/regions not covered by a valid NRA, according to Section 3 of this procedure.

### **3 Proposal to develop a National Risk Assessment**

3.1 A proposal to develop a NRA shall be submitted to FSC by the responsible body prior to development of the NRA, and shall include the following elements:

- a) Objective;
- b) Scope of the NRA, including geographical area and type(s) of forest;
- c) Name, 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 how funds are secured;
- f) Identification of the national decision body (see Section 6, below);
- 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 2.8 above.

3.2 Proposal to develop a NRA shall be submitted in English or Spanish, using the template provided in Annex B.

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 was 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 based on 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, below);
  - b) A final draft for submission to FSC, developed based on the input from stakeholder consultation.
- 4.3 Each draft shall be considered complete once signed-off by the NRA-WG.
- 4.4 Upon receipt, the FSC will review the draft within a maximum of thirty (30) working days.
- 4.5 The first draft shall be sent to FSC in English or Spanish for review prior to its first public consultation.

#### **5 Stakeholder consultation**

- 5.1 The NRA draft shall be publicly consulted to ensure relevance of the NRA to national/regional conditions and allow stakeholder contribution to the NRA process.
- 5.2 The Coordinator shall identify stakeholders according to tAnnex A, and shall invite to comment on the NRA draft. The Coordinator shall ensure that stakeholders from all stakeholder groups as specified in Annex A are covered.

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 and contact details of stakeholders identified per Clause 5.2, above.
- 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 The 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 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 date of the stakeholder consultation period;
- d) The draft National Risk Assessment;
- e) The contact details of the Coordinator;
- f) The estimated timeline for completion of the proposed NRA;
- g) A brief description of how, upon approval, the NRA will be maintained;
- h) A statement that the comment 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 contacts by phone or letter; notice published in national and/ or local press and on relevant websites; local radio announcements; or on local customary notice boards in the language of the local people and email contacts in the language of the recipients. The Coordinator should consider holding stakeholder workshop(s) 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, in particular to any marginalized groups that may be affected by the NRA.

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 vision and mission.

5.10 The Coordinator shall respond to all stakeholders who participate in the consultation process and indicate how their comments were taken into account, within sixty (60) days of the end of the consultation period.

5.11 The Coordinator shall prepare a stakeholder consultation report and agree it with the NRA-WG.

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) A copy of all comments as an Annex to the report.

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

- 5.13 The Coordinator shall send the stakeholder consultation report in English or Spanish to FSC within sixty (60) days of the end of consultation period.
- 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 website(s) used for communication about the NRA process is required, whenever such website(s) exists.

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

- 5.15 The need for additional consultations 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 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 in cases when a FSC Network Partner is involved in the NRA process, or when 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 2.9

- 6.3 The national decision-making body shall consider the applicable requirements of this procedure when approving the final draft NRA.

## **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) A brief application letter, signed by the representative of the national decision body

and confirming national approval;

- b) The final draft NRA in English or Spanish signed-off by the NRA-WG and the Coordinator;
- c) A copy of the stakeholder consultation report(s), including the list of stakeholders contacted.

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 on 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, 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 with suggestions on the steps necessary to address the concerns.

- 8.2 The decision will be communicated to the national decision-making 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 of the approval date.

NOTE: This is not the case for NRAs approved as a result of an update or urgent revision (see Section 10).

## **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 and at least every five (5) years 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 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, 2<sup>nd</sup> level version number (e.g. V1-1, V1-2).

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

- 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 10.4. For each revision of the NRA a new 1<sup>st</sup>-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, newly published scientific evidence, etc.

- 10.5 A 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 after the end of 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

## **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 a 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, when stakeholder consultation is targeted at a limited group of stakeholders etc.

- 11.2 FSC is entitled to conduct a NRA internationally in cooperation with external bodies which have the required expertise in Controlled Wood categories. This includes situations where no NP exists or when it is not capable of conducting the NRA in a timeframe adequate to ensure sufficient Controlled Wood system performance.
- 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 a NRA, all attempts will be made to solve any issues in mutual dialogue between FSC and the responsible body.
- 11.4 FSC may invalidate a 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 achieving solutions at the local (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.

## **Annex A Stakeholder groups to be consulted in the NRA process**

Stakeholders representing interests as 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, at the national level and designated risk level, if different;
- d) Controlled Wood Certificate Holders

### **2. Social interests**

- a) NGOs involved, or with interest in, social aspects of forest management, at the national level and designated risk level, if different;
- b) Forest workers;
- c) Representatives of Indigenous Peoples and local communities that are involved or have interest in forest management at the national and designated risk level, if different;
- d) Representatives of Indigenous Peoples and/or Traditional Peoples (if present)
- e) Representatives of recreation interests.

### **3. Environmental interests**

- a) NGOs that are involved or have interest in the environmental aspects of forest management, at the national level and designated risk level, if different. Consultation should target the following areas of interest and expertise:
  - Biological diversity
  - Water and soil
  - High Conservation Values
  - Ecosystems and Landscapes;
- b) Local communities and Indigenous Peoples representatives (HCV 5 and 6);

- 4. FSC-accredited Certification Bodies active in the country;
- 5. National and state forest agencies;
- 6. Technical experts;
- 7. Research institutions and universities;
- 8. FSC Network Partners and registered Standard Development Groups and NRA Working Groups in the region<sup>2</sup>.

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<sup>2</sup> FSC has representation in following regions: Europe (including CIS), North America, Latin America, Africa, Asia and Pacific.

## **Annex B      Proposal for NRA development template**

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

DRAFT

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 of National Risk Assessment development/revision for country/region, according to FSC-PRO-60-002 V3-0 The Development and Approval of Controlled Wood National Risk Assessments.*

**Contents**

1. Objective
2. Scope of the risk assessment
3. Composition and qualifications of NRA Working Group
4. Coordination
5. Timetable and budget
6. National decision body
7. Body responsible for NRA development and maintenance
8. Existing Controlled Wood risk assessments (optional)
9. Miscellaneous (optional)

**Evaluation of the proposal (PSU)**

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

.....

**Objective**

Assessing risk for harvesting wood from all FSC 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).*



## 1 Scope of the risk assessment

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

## 2 Composition and qualification of NRA Working Group

*Name, qualifications and contact details of the members of National Risk Assessment Working Group and brief assessment of elements required according to FSC-STD-60-006 Process requirements for the development and maintenance of National Forest Stewardship Standards. If the NRA is going to be developed by an existing, registered SDG, please provide this information and date of registration; Working group language specification.*

## 3 Coordination

*Name, qualification and contact details of the facilitator appointed to manage the NRA process. Main means of contact with FSC shall be specified.*

*This person coordinates the Working Group and is the main contact representing the entity responsible for NRA development (e.g. RO) and PSU).*

## 4 Timetable and budget

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

## 5 National decision body

*Identification of the National decision body according to the requirements of FSC-PRO-60-002 V3-0 The Development and Approval of Controlled Wood National Risk Assessment, Section 8.*

## 6 Existing Controlled Wood risk assessments (optional)

*General overview on existing risk assessments (where and when relevant) for given country / region based on information available on info.fsc.org; no detailed analysis is required in this section.*

## 8 Miscellaneous (optional)

<sup>3</sup> Information of resources and their availability to date of sending proposal

<sup>4</sup> PSU approval for draft contents is required prior to consultation

*Additional information provided by the Applicant*

Approved by .....  
(National decision body)

### **Evaluation of the proposal (PSU)**

Decision:

☐ Approval

Date:

Approved by: Name and function

☐ Rejection

Reason of the rejection:

General comments:

DRAFT

## Annex C National Risk Assessment template

### Controlled Wood National Risk Assessment

For ..... (country/region)

DEVELOPED BASED ON PROCEDURE FSC-PRO-60-002 V 3-0

<b>Version Code</b>	V 1-0 CWNRA-XX-V1-0 (XX-code of the country, e.g. DE, V-version)
<b>National Approval</b>	National decision body, date
<b>International Approval</b>	FSC International Center: Policy and Standards Unit Date
<b>International contact</b>	Name and email address
<b>Period of validity</b>	Date of approval – date of the next regular revision
<b>Body responsible for NRA maintenance</b>	Name, contact details

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

Controlled Wood categories		Risk level
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	

## Table of 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 on 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 Identification of applicable legislation (optional)

### 1 Background information

This section shall summarise National Risk Assessment development, including but not limited to information about:

- Timeline of the National Risk Assessment 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 an entity responsible for maintenance of the National Risk Assessment shall be indicated and information on how the NRA will be reviewed shall be specified. To complete this section, please refer to the requirements of *FSC-PRO-60-002 V 3-0*, Part III: Maintenance of a National Risk Assessments.

### 4 Complaints and disputes on an approved National Risk Assessment

This section shall describe steps to be taken by the entity responsible for maintenance of the National Risk Assessment in the case that complaints and disputes exist regarding the National Risk Assessment.

How complaints may be sent to the responsible entity shall be specified.

In case of the proposal for NRA revision, a summary of the performance of an existing complaint mechanism(s) shall be included.

### 5 List of key stakeholders for consultation

In this section the list of key stakeholders shall be provided, indicating who participated in the consultation process on the National Risk Assessment, as well as a specification of stakeholders who should be consulted in the NRA revision process according to Annex A.

## 6 Risk assessment

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

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 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:

(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: .....

For applicable legislation see Annex C1

Indicator (Applicable legality categories and sub-categories)	Sources of information <sup>5</sup>	Risk designation and specification (if not 'low risk') Provide numbers of thresholds <sup>6</sup> that are met. JUSTIFY THE OUTCOME (for each threshold)	Functional scale <sup>7</sup>	Control Measures M – mandatory R – recommended
(1)	(2)	(3)	(4)	(5)
<i>Example 1</i>				
<b>Legal rights to harvest</b>				
1.1 Land tenure and management rights.	World Bank Worldwide Governance Indicators: <a href="http://info.worldbank.org/governance/wgi/sc_country.asp">info.worldbank.org/governance/wgi/sc_country.asp</a> ;	Low (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).	-	-
1.2 Concession licenses.	NGO report on issuing and controlling of licencing and planning (available at: ...) Transparency International <a href="http://www.transparency.org/policy_research/surveys_indices/cpi">http://www.transparency.org/policy_research/surveys_indices/cpi</a> for Transparency International indices; Government report on land	Specified (2) NGO report provides 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 however exists in a great majority for private forest.	Ownership: 'Specified risk' – private forest; 'Low risk' – other forests.	Where concession is required, sourcing from forest areas with valid concession license.
1.3 Management and harvesting planning.		Low (1): Sources confirm enforcement of these laws (general assessment of law enforcement based on international indicators and lack of evidence of	-	-

<sup>5</sup> Provide justification why only these sources were used in the assessment.

<sup>6</sup> See threshold numbers provided in the NRAF.

<sup>7</sup> Spatial units based on non-geographical characteristics, e.g. type of forested area tenure/ownership, scope of management, SIR.

1.4 Harvesting permits.	management and rights (NGO, available at....)	violation of these laws). Low (1): Sources confirm enforcement of these laws (general assessment of law enforcement based on international indicators and lack of evidence of violation of these laws).		
<i>Example 2</i>				
1.14 FPIC	Royal Institute of International Affairs: <a href="http://www.illegal-logging.org">www.illegal-logging.org</a> (provide directory to relevant report!); Expert overview on laws regulating traditional rights (report: ...).	Specified (2) 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.	IP presence: 'Low risk' for area not occupied by IP; 'Specified risk' for area occupied by IP (keep consistency with cat. 2 assessment)	Documentation confirms FPIC implementation in sourcing area. (keep consistency with cat. 2 assessment)
1.15 Indigenous Peoples rights				

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

Summary of risk assessment process: .....

1	2	3	4	5
<i>Example 1</i>				
2.3. The rights of Indigenous and Traditional Peoples are upheld.	Legality assessment (see Category 1);	Specified (22): See risk specification for indicators 1.14 and 1.15.	IP presence: 'Low risk' for area not occupied by IP; 'Specified risk' for area occupied by IP	Documentation confirms FPIC implementation in sourcing area.
<i>Example 2</i>				
2.3. The rights of Indigenous and Traditional Peoples are upheld.	Applicable legislation (see Category 1); NGO report about nomads entering region covered by the area under assessment. ILO database (...)	Specified (24): NGO reports confirm seasonal presence of Indigenous Peoples in the northern part of the area. There are no laws nor regulations, as well as other practices ensuring respect to traditional laws and NGO report provides evidence of these laws violation. Sources challenging NGO findings do not provide sufficient contra-arguments for report contents.	IP presence: 'Low risk' for area not occupied by IP; 'Specified risk' for area occupied by IP	Documentation confirms FPIC implementation in sourcing area.

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

Summary of risk assessment process: .....

HCV category	Data <sup>8</sup> used for HCV identification	Identified threats (provide sources <sup>9</sup> )	3	4	5
<i>Example 1</i>					
HCV 1	Known and available inventory data relevant for HCVs. Threatened species recovery plans / implementation reports. (...)	Habitat removal (Act of forest ....; Code of practice of Public State Forest XX)	Specified (8): Management regulations do not require protection of birth sites of HCV. As within the area species XX require seasonal protection, 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 of nature protection (particularly: national parks and reserves) and in the forest areas managed by public state forest due to internal regulation	'Low risk': Public state forest (identified risk is mitigated by internal code of practice and existing evidence confirms that code is respected). 'Specified risk': rest of the area.	Sourcing from areas where seasonal birth sites are not logged during breeding season; Ex. Of verifiers: agreements with forest managers that confirm CM implementation.

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

Summary of risk assessment process: .....

1	2	3	4	5
<i>Example 1</i>				
4.1 (...)	Legality assessment (see Category 1);	Low (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.	-	-
<i>Example 2</i>				
4.1 (...)	Spatial database of sourcing forest area. Land cover reports.	Low (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 exceed the threshold.	-	-

<sup>8</sup> Provide justification why only these sources were used in the assessment.

<sup>9</sup> Provide justification why only these sources were used in the assessment.

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

Summary of risk assessment process: .....

1	2	3	4	5
<i>Example1</i>				
5.1	Legality assessment (see Category 1);	Low (1) Introduction of GM trees to forest areas is forbidden according to the law. Category 1 assessment confirms law enforcement.	-	-

### Annex C1 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 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). Whenever possible, applicable legislation shall be provided for indicators included in the law subcategories. Justification shall be provided when level of indicator is not achieved

Laws and regulation identified as per above and relevant for: labour rights, the rights of indigenous and Traditional Peoples, conversion of forest to plantation and/or non-forest use, as well as GMO use shall be identified for each of these.



## Annex D Risk Assessment evaluation template

### Evaluation of the National Risk Assessment for PSU Approval

<b>Name of Applicant</b>	
<b>Geographical scope of the NRA</b>	
<b>NRA code</b>	
<b>Contact Information of Coordinator</b>	
<b>Date of application to PSU</b>	
<b>Date of evaluation by PSU</b>	
<b>Evaluator</b>	
<b>Resubmission</b>	(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 EN/ ES			(Date of proposal approval)
Objective			
Scope of the risk assessment			
Composition and qualifications of NRA Working Group			
Coordination			
Timetable and budget			
National decision body			
Timetable and budget followed?			
Others			

##### 1.2 Drafting

REQUIREMENT	YES	NO	COMMENT
Number of drafts developed (sufficient?)	-	-	
PSU notified prior to consultation?			
=>60 days consultation period for each draft?			
Consultation reports submitted?			

##### 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 Working Group			
Other documents (specify)			

## 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 of qualifications of the working bodies.

### 2.2 Stakeholder representation

STAKEHOLDER GROUP	YES	NO	COMMENT
<b>Economic</b>			
Owners/managers of large and medium FMUs			
Owners/managers of SLIMFs			
Forest contractors			
Representatives of forest workers			
Representatives of forest industries			
Controlled Wood Certificate Holders			
<b>Social</b>			
NGOs (social aspects)			
Forest workers			
Representatives of Indigenous/Traditional Peoples			
Representatives of recreation interests			
<b>Environmental</b>			
NGOs (environmental aspect)			
Representatives of local communities (HCV 5)			
Representatives of Indigenous Peoples (HCV 6)			
<b>CBs active in the country</b>			
<b>National and states forest agencies</b>			
<b>Technical experts</b>			
<b>Research institutions / Universities</b>			
<b>FSC Partners, registered Working Groups</b>			

### 2.3 Stakeholder consultation

REQUIREMENT	YES	NO	COMMENT
Means of consultation adequate?			
=>60 day consultation period?			
PSU 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)			

## 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			
Risk determination follows requirements and gathered information			
Risk specification sufficient?			
Control Measures formulated correctly			

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

### C PSU 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

## **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 PSU
- 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 PSU 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](http://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**

- This may be done by a 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 PSU 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
- Prepare a consultation report and send it to PSU
- Decide on the 2<sup>nd</sup>/Final draft development

### **Step 6: Develop X/Final Draft**

- This may be done by a 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)
- FSC posts the approved NRA on the FSC webpage and Global Forest Registry

DRAFT