Forest Stewardship Council®

White Paper: Streamlining the FSC® Normative Framework and the procedure for the development and revision of normative documents

Title: White Paper: Streamlining the FSC® Normative Framework and the procedure for the development and revision of normative documents

Contact for comments: FSC International Center
Performance and Standards Unit
Adenauerallee 134
53113 Bonn, Germany
psu@fsc.org

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

FSC's vision is that the true value of forests is recognized and fully incorporated into society worldwide. FSC is the leading catalyst and defining force for improved forest management and market transformation, shifting the global forest trend toward sustainable use, conservation, restoration, and respect for all.

Table of contents

Executive Summary

The objective of this white paper is to inform the FSC membership about:

a. FSC's intentions and ongoing efforts to streamline the FSC Normative Framework,

b. Why FSC's procedure FSC-PRO-01-001 V3-1 The Development and Revision of FSC Normative Documents needs to be streamlined, and

c. How these two initiatives are linked and what can be expected from these processes.

After nearly 30 years of development and much success in its implementation, it is widely recognized the FSC Normative Framework has become overly complex and is increasingly difficult to manage and implement. Consequently, the FSC strategy has now called for streamlining the normative framework and, subsequently, the following set of 'streamlining principles' were developed as objectives of the process:

1. To ensure system integrity, transparency and credibility,
2. To be more user-focused, making normative documents less complex and easier to understand,
3. To address root problems and risks related to achieving FSC's mission,
4. To embrace risk management,
5. To focus documents on desired outcomes,
6. To integrate work streams within the organization,
7. To embrace new technologies for access and implementation of the normative framework, and
8. To understand FSC's impacts and continuously improve.

Streamlining the FSC Normative Framework is an ambitious project, considering that we're starting from a complex system of over 200 normative documents that are being implemented by tens of thousands of active FSC certificate holders around the world. To tackle it, the following strategies are being implemented concurrently:

• Revising FSC-PRO-01-001,
• Developing guidance documents to support the transition to risk-based and outcome-oriented normative documents,
• Developing new tools and technology for access and implementation of the normative framework, and
• Developing a strategic roadmap for the revision of normative documents.
Revising the documents of the normative framework in order to meet the streamlining principles requires following FSC-PRO-01-001. This is the procedure that sets the requirements for how FSC's standards, policies and procedures are developed and revised, and is based on ISEAL's Code of Good Practice for Setting Social and Environmental Standards. There are currently 70 international normative documents in the FSC Normative Framework that are subject to this procedure. In turn, the national normative documents follow procedures based on FSC-PRO-01-001. Accordingly, this procedure is considered the main vehicle for incorporating FSC's streamlining principles into the normative framework.

Following the current version of the procedure, FSC revision processes average about two years to complete and require immense human and financial resources. Some of the many factors contributing to the inefficiency and ineffectiveness of the process include: inflexibility in the process for developing/revising documents of varying scope, impact, or risk; too many steps early in the process that aren't achieving their intended results; missed opportunities to engage the membership in higher-level policy and outcome discussions; time lost in hand-offs between teams and decision-making bodies; gaps in the procedure (e.g. for implementation, and monitoring and evaluation) and the perpetual reliance on members and other volunteers for the development/revision of normative documents when few members have the unique qualifications, or are available for, and/or interested in, this demanding work. That is to say, FSC-PRO-01-001 needs to be revised to follow and incorporate the eight streamlining principles into the procedure itself.

With a greater understanding of the expected medium and long-term outcomes and progress to date, it is the hope of FSC that members will more fully comprehend how the revision of FSC- PRO-01-001 is key to streamlining the whole FSC Normative Framework and will be motivated to participate in the procedure revision process.

Abbreviations

ASI - Accreditation Services International

Board – FSC Board of Directors

CB - Certification Body

CoC - Chain of Custody

CW – Controlled Wood

CWRA – Controlled Wood Risk Assessment

FM – Forest Management

FSC - Forest Stewardship Council

ILO – International Labour Organization

ISEAL – ISEAL Alliance

M&E – Monitoring and evaluation

NF - Normative Framework

NFSS - National Forest Stewardship

      Standards

PDF - Portable Document Format

PSC - Policy and Standards Committee

PSG – Policy Steering Group

PSU – Performance and Standards Unit

References

FSC Global Strategy 2015-2020

FSC Global Strategy 2021-2026

FSC Governance Review 2.0 – Final report and recommendations. March 31, 2019

FSC-PRO-01-001 V3-1 The Development and Revision of FSC Normative Documents

FSC-STD-01-002 FSC Glossary of Terms

ISEAL Code of Good Practice for Setting Social and Environmental Standards (aka ISEAL's Standard-Setting Code), V6.0, December 2014

ISO/IEC Guide 59: 2019(E). ISO and IEC recommended practices for standardization by national bodies

PSU Review Report of FSC-PRO-01-001 V3-1 The Development and Revision of FSC Normative Documents

WTO Agreement on Technical Barriers to Trade (TBT) Annex 3: 1995. Code of good practice for the preparation, adoption and application of standards

Objective

Methodology

The objective of this white paper is to inform the FSC membership about:

a. FSC's intentions and ongoing efforts to streamline the FSC Normative Framework,

b. Why FSC's procedure FSC-PRO-01-001 V3-1 The Development and Revision of FSC Normative Documents needs to be streamlined1, and

c. How these two initiatives are linked and what can be expected from these processes.

With a greater understanding of the expected medium and long-term outcomes and progress to date, it is the hope of FSC that members will more fully comprehend how the revision of FSC-PRO-01-001 is key to streamlining the whole FSC Normative Framework and will be motivated to participate in the procedure revision process.

The paper was developed in conformance with the terms of reference provided by the FSC secretariat. 15 interviews were conducted over a 3-week period with members of the FSC Board of Directors (hereinafter referred to as "the Board") and Policy and Standards Committee (PSC), as well as staff of the FSC leadership team, FSC members and individuals responsible for leading the development and revision of normative documents at other membership-based organizations. A survey of FSC's Program Managers and staff was also conducted to collect concrete examples and available data regarding implementation of the procedure. And finally, a review of several documents including the current procedure, findings of the governance review, FSC strategy documents and implementation plan, and ISEAL's Standard-Setting Code (see References).

---

1 This paper does not make proposals or recommendations with regards to the revision of FSC-PRO-01-001.
There is a technical working group appointed for this, as part of the revision process that was in progress at the time of publishing.

I. Background

What is the Normative Framework and FSC-PRO-01-001?

The FSC Normative Framework (NF) is the integrated system of FSC policies, standards, procedures, advice notes/directives, and interpretations (see Annex 1: Explanation of FSC Normative Documents) that applicants, certificate holders, and certification bodies are expected to conform to[2]. At the time of publishing this paper, there were 213 approved documents in the FSC Normative Framework, including 82 National Forest Stewardship Standards (NFSS) and 61 Controlled Wood Risk Assessments (CWRA).

FSC-PRO-01-001 The Development and Revision of FSC Normative Documents, specifies how documents of the NF are developed, reviewed, revised and withdrawn. It is applicable for all normative documents (policies, standards, directives and advice notes), with the exception of NFSS and CWRA[3]. Currently, there are 70 normative documents that are covered by the scope of this procedure. There have been two major and three minor revisions to FSC-PRO-01-001 since it was initially approved by the Board, including updates to remain in conformance with revised versions of the ISEAL Standard-Setting Code.[4] The latest version (V3-1) has been effective since January 2016.

Without going into too many technical details on the content of PRO-01-001, here are some fundamentals to understand about the procedure:

1. FSC-PRO-01-001 meets ISEAL's[5] Code of Good Practice for Setting Social and Environmental Standards, which is an international standard adopted by some of the most well-recognized and respected environmental and social standard-setting organizations in the world, including the Fair Trade International, Marine Stewardship Council (MSC), Roundtable for Sustainable Palm Oil (RSPO), and several others. ISEAL's Standard Setting Code meets and builds on international standard-setting practices, namely the WTO Technical Barriers to Trade (TBT) Agreement Annex 3 Code of good practice for the preparation, adoption and application of standards, and ISO/IEC Guide 59 Code of good practice for standardization.

2. The procedure was written for document-by-document development/revision processes. A very basic depiction of the process is shown below (see Figure 1), beginning with the decision to develop a normative document. Once a document is approved, it must be reviewed at least once every five years to assess its continued relevance and effectiveness in meeting its objectives. Thus,after several years it starts again at the top: Decision to revise. If the decision is to not revise the document, then the process would stop there and, in a maximum of five years' time, the document would be reviewed and considered for revision again. In other words, it is not compulsory that documents follow the complete process every five years, although this is typical for some normative documents. Note that the figure includes two consultations as this is currently most common. There must always be at least one, but there may be more if necessary.

---

2 Note: Guidance documents and internal FSC quality system documents are not included in the Normative Framework.
3 NFSS and CWRA documents are developed and approved in accordance with their own procedures, which are based on FSC-PRO-01-001. These two procedures (for NFSS and CWRA development and approval) are scheduled for separate revision processes where streamlining for efficiency and effectiveness will also be the focus.
4 See Annex 2: FSC-PRO-01-001 Version History for a full record of the development of this procedure from V1-0 to the current V3-1.
5 ISEAL is an international membership organization whose mission is to accelerate positive change by improving the impacts of ambitious sustainability systems and their partners. **https://www.isealalliance.org/**

Figure 1: The basic process for development or review/revision of a normative document

The focus of this paper is on those 70 normative documents that fall under the scope of FSC- PRO-01-001, thus excluding the NFSS and CWRA documents. Annex 1 provides a breakdown of these 70 normative documents, categorized under five (5) core themes and an explanation of the six (6) core FSC document types.

How does FSC's Normative Framework compare to other organizations?

For perspective, the author conducted a brief review of five comparable certification schemes: Fairtrade International, Marine Stewardship Council, Programme for the Endorsement of Forest Certification, Roundtable for Sustainable Palm Oil, and Sustainable Forestry Initiative.

Most of these organizations have similar document types: standards, policies, procedures and interpretations, although some use different names or have slightly different connotations. All five follow ISEAL's Standard-Setting Code[6], and thus review (and as necessary revise) their social and environmental standards within 5 years of the last approval date to ensure that they remain relevant and effective.

The most obvious difference is that these organisations all have far fewer normative documents, typically 10 or less, compared to FSC's 70 equivalent normative documents (excluding NFSS and CWRA). For further details see Annex 3: Normative frameworks of similar certification organizations.

With fewer normative documents and/or review processes, there are typically periods of time (two or more years) where there is only interpretation of the requirements and no new or revised requirements being introduced. During these periods, the organizations focus their efforts on implementation, monitoring and evaluation before the next review / revision cycle begins.

Why is the FSC Normative Framework so large?

FSC is a nearly 30 year old organization with a scope and scale that has expanded greatly since the idea of a voluntary, market-based certification to improve forestry practices worldwide was first conceived. In the early days of FSC there were few examples to follow; it was one of the first organizations of its kind.

The FSC Normative Framework started out with one standard: the FSC Principles and Criteria for Responsible Forest Management, formally approved by the Board in 1994 following the first General Assembly in 1993. To make it operational, a manual was developed including basic requirements for certification bodies auditing and certifying companies, and the first FSC chain of custody standard: the 6 principles of chain of custody, which fit on one sheet of paper (printed on both sides, of course).

The FSC Normative Framework really began to expand in the early 2000's with the development of several high-level policies, trademark use requirements, accreditation standards for certification bodies, a new chain of custody standard that included the credit system for mixing of certified and non-certified wood/fiber, separate standards for recycled content and FSC controlled wood, procedures for the development of standards and policies, and plenty of advice notes along the way to outline how to apply the standard requirements for special cases not yet covered by the standards (e.g. non-timber forest products and minor components).

FSC's approach over the years has been to create new documents for new subjects, as opposed to incorporating new policies, procedures or requirements into existing documents, and thus, the number of normative documents has continued to grow over the years. Occasionally documents are combined or withdrawn. As one example, there were once separate procedures for the development and revision of standards and policies but the procedure for policies was incorporated into FSC-PRO-01-001 which now covers both standards and policies, and more.

In addition to creating more normative documents over time, with each revision normative documents tend to get longer with more specific requirements added to address situations that hadn't previously been addressed. Two sources of additional and more specific requirements are interpretations and advice notes. It is part of the normative document revision process to incorporate published interpretations and advice notes with each revision, which makes the normative documents increasingly detailed over time.

6 The ISEAL's Standard-Setting Code scope addresses social and environmental requirements.

What are the impacts of having a large normative framework?

The size of the Normative Framework and managing it in accordance with FSC-PRO-01-001 has wide-ranging impacts on the FSC secretariat as well as its Board, network partners, members, certificate holders and other stakeholders.

Recalling that there are 70 normative documents under the scope of this procedure, which must be reviewed within five years of their approval date, this means that there would need to be roughly 13 or 14 reviews each year to remain in conformance with this requirement. Most reviews of normative documents lead to a revision process, and revision processes take more than a year to complete following the current procedure, but typically two years and sometimes more (see Annex 4: Recent FSC revision process timelines).

This means, mathematically, that there could be as many as 25-30 revisions in process at any given time. Currently, there are 32 processes to revise, and develop new, normative documents in the "Policy Road Map" for 2021-2023 (accessed on 14 July 2021)[7].

Each process requires appointing, at minimum, a coordinator, a supervisor, and a working group. In addition, other bodies are also involved in guiding and deciding on the deliverables of the process, e.g., the Policy Director, the Policy Steering Group (PSG), the Policy and Standards Committee (PSC), and the Board. This adds up to a lot of capable and qualified humans needed within the secretariat and member- ship to get this work done on an ongoing basis.

In addition to development and revision of policies, standards and procedures governed by the requirements of FSC-PRO-01-001, there is also the development and revision of NFSS, CWRA, advice notes and interpretations and non-normative guidance. Some development, review and revision processes of normative documents are initiated by successful motions, the FSC global strategy, and other initiatives that make up the annual work plan for the secretariat. This mountain of work, and associated outcomes, impact the whole FSC global network, ASI, certification bodies, certificate holders, and those members dutifully or wholeheartedly trying to keep up.

"No one except full-time professionals can keep track of it all
and maneuver through it, and even they are struggling",
general sentiment of interviewees

---

7 A link to the current policy road map is available in the document centre: **https://fsc.org/en/document-centre** *(see the introductory paragraph at top of webpage). Similarly, specific information on a particular process can be found on the FSC website under "Current Processes",* **https://fsc.org/en/current-processes**

With multiple simultaneous processes and projects occurring at all times, FSC has had to increase its staff size, particularly in PSU. Many feel FSC is now struggling with the inevitable 'silo effect'. With more people, each working in specialized roles, it is increasingly difficult to keep everyone apprised of all that is going on in the unit, let alone the organization and network.

From the outside, many members and other stakeholders feel that they are continually being asked to volunteer for working groups, join consultative forums, comment on draft documents or implement new requirements. While at the same time, other members and stakeholders are unaware of how to get involved or keep up-to-date on developments, and feel blindsided when there are changes. All of this continuous activity makes it very difficult to stay informed, let alone engaged.

Several of these issues boil down to the sheer number of documents in the NF that must be managed in accordance with FSC-PRO-01-001.

II. Streamlining the FSC Normative Framework

What does "streamlining" the FSC Normative Framework mean and why is this necessary?

Streamline: "To make an organization or system more efficient and effective by employing faster or simpler working methods" (Oxford Dictionary/ Lexicon).

This definition may evoke an image of a well-oiled FSC machine working to mass-produce new standards and advice notes faster than before. Some have raised concerns that streamlining means cutting corners and reducing costs in ways that will lead to the erosion of the system's rigor and weaken its integrity. And with regards to streamlining FSC-PRO-01-001 in particular, there are concerns that the intention is to limit the role and input of the membership and Board and shift more influence and decision-making to the secretariat.

> The FSC Governance Review 2.0 (March 31, 2019) found that "FSC's core governance - a three chamber system with the membership as the highest decision making body - was and still is its core strength and competitive advantage due to the superior credibility it gives FSC's Standards."

In speaking with representatives and members of FSC for this paper, and reading various documents and reports that capture the sentiments of the FSC membership and secretariat, the vision of a streamlined normative framework comes down to being "more efficient and effective", yes, but by employing strategic, Board-endorsed streamlining principles[8] rather than just "faster or simpler methods."

Streamlining means to:

- ensure system integrity, transparency and credibility,
- be more user-focused, making normative documents less complex and easier to understand,
- address root problems and risks related to achieving FSC's mission,
- embrace risk management,
- focus documents on desired outcomes,
- integrate work streams within the organization,
- embrace new technologies for access and implementation of the normative framework, and
 - understand FSC's impacts and continuously improve.

The approach is to think of streamlining mainly from the user's perspective (e.g. certificate holders), accepting that while some systems may become more complex in their development (e.g. incorporating a risk-based approach in standards), the revised system will provide users with a more outcome-oriented interface by focusing on what is most relevant.

FSC has a large and complex normative framework and following the current procedure requires many resources and takes substantial time to implement. This impedes FSC from adapting and innovating when required, and deliver sound and timely solutions for its users and the consumers who drive the whole market-based system. With a business as usual approach, the NF would continue to grow and exacerbate current issues.

FSC is embarking in an effort to streamline its NF, to not only avoid these issues but to strengthen as an organization and benefit from the application and implementation of the streamlining principles and strategies.

---

8 See Annex 5: FSC's Streamlining principles for the full list and explanation of the eight Streamlining Principles.

How do we get from here, to a streamlined FSC Normative Framework?

Streamlining the FSC NF is an ambitious project, considering that we're starting from a large and complex system that is being implemented by tens of thousands of active FSC certificate holders around the world. To tackle it, four strategies are being implemented concurrently:

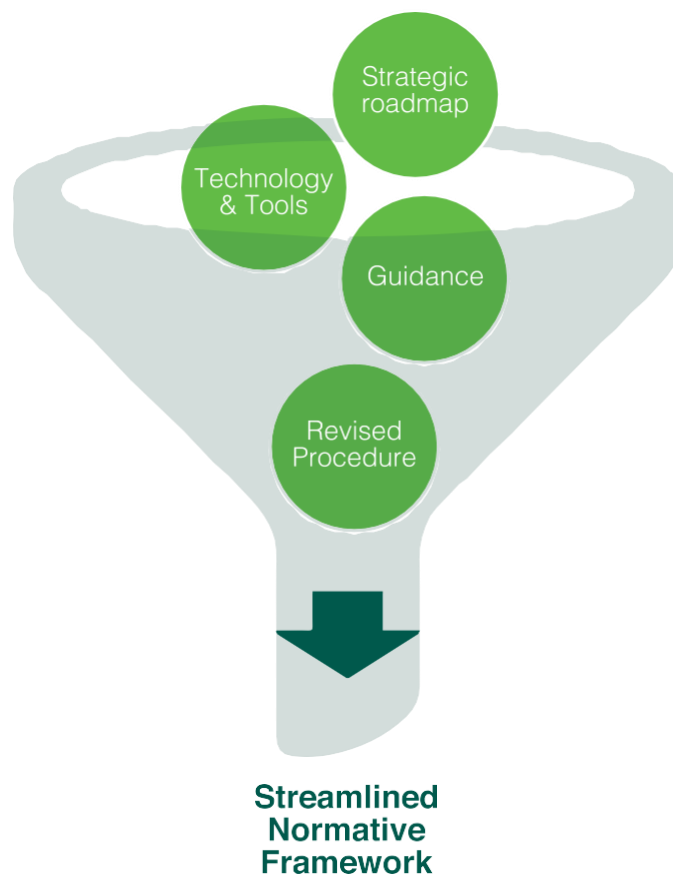Strategy 1: Revising FSC-PRO-01-001,

Strategy 2: Developing guidance documents to support the transition to risk-based and outcome-oriented normative documents

Strategy 3: Developing new tools and technology

Strategy 4: Developing a strategic roadmap for the revision of normative documents.

Figure 2: Strategies for streamlining the FSC Normative Framework

Streamlined Normative Framework

Strategy 1: As explained before, FSC-PRO-01-001 is the procedure for the development and re-vision of all FSC normative documents, excluding NFSS and CWRA. FSC-PRO-01-001 is being revised to incorporate FSC's streamlining principles into the NF, as well as into the procedure itself, to make the normative documents more efficient, and effective, and to accelerate development and revision processes. Specific issues and concerns with the current procedure are detailed in section III. Revising FSC-PRO-01-001.

In addition to the revised procedure, under **Strategy 2** FSC will develop guidance and best practice documents to support transitioning new and existing normative documents to being more risk- based and outcome-oriented. Risk-based means focusing requirements (and auditing of requirements) on the most relevant aspects, considering the likelihood of non-conformity and negative impacts. Outcome-oriented normative documents are focused more on intended impacts and their measurability, as opposed to mainly defining specific rules and mandated approaches. Although it is already an established goal of FSC to transition its normative documents to be more risk-based and outcome-oriented, the process has only partially begun to date.

Under **Strategy 3**, FSC is in the process of developing several tools and technologies that will help to streamline its normative framework.

As one example, FSC recently began the process of "digitalizing" all 213 normative documents, include NFSS and CWRA, as well as all guidance documents. "Digitalizing" means entering each requirement/clause into an online database, tagging information such as its origin or source doc-ument (e.g. FSC-STD-30-010), category (e.g. standard), area (e.g. General, FM, CoC, CW, Trade-mark, NFSS, etc.), related requirements (e.g. interpretations), applicability (e.g. small holders or a specific country), etc.

One of the main objectives of the digitalization project is to enable the searchability of normative requirements by a number of attributes. For example, you could search for all requirements pertain-ing to smallholders. Or, for all requirements applicable for a particular scope of certification, such as a manufacturer using a credit system including verification of controlled wood and reclaimed material to produce a product that would carry an on-product label. With all requirements currently contained in documents saved as PDFs on the FSC website, searching for and filtering specific requirements is not currently an option. This project would also facilitate a modular-approach to the review of requirements, where related requirements could be identified through the database to be reviewed together. Digitization of documents will also make it easier to communicate risk-based and locally adapted requirements to the appropriate audiences/users.

Another tool under development is an online portal that will be used for easy access to interpretations for certificate holders, certification bodies, and ASI, as well as for requesting, discussing and reviewing draft interpretations. And a third example is the development of digitized online reports. The forest management online reporting system will be live soon, which will make the valuable data collected by certification bodies regarding FM certificate holders accessible, retrievable and collatable, whereas historically this information was stored in PDF documents. Digital reports for all certificate holders (that either leave out or ensure confidential and proprietary information is secure) would allow for better monitoring and evaluation of FSC's impacts, and perhaps more efficient roll-outs of revised requirements as each certification body won't have to individually revise their audit report templates.

And, last but not least, **Strategy 4** is to use a strategic roadmap for the revision of existing normative documents. As discussed, there are several normative documents which must be revised in accordance with FSC-PRO-01-001. Even with a revised procedure it will take time to streamline them all. The strategic roadmap outlines which documents are of highest priority for revision. Another objective of the strategic roadmap is to reduce the overall size of the NF by identifying which documents can be combined, condensed or eliminated.

III. Revising FSC-PRO-01-001

Why is FSC-PRO-01-001 being revised?

As outlined above, the revision of FSC-PRO-01-001 is one of four strategies for the streamlining of the FSC NF. Arguably, it is the most crucial due to the significance of the documents that fall under its scope and the resources and time currently required to implement it. This procedure is considered the main vehicle for incorporating FSC's streamlining principles into the NF and is beingrevised with the expressed aims of making the procedure more efficient, accelerating development and revision processes, closing gaps, and making the procedure more effective.

Broadly speaking, as a normative document covered by the scope of the procedure, the procedure itself must undergo a review at least every five years to determine if there is need for a revision. The current version of the procedure was approved in March 2015 so the procedure was due for a review in 2020.

This compulsory review process began in mid-2019 and was completed in September 2019. The review process included drafting a review report on the proposed revision of the procedure which was circulated for public consultation from July 18 - September 5, 2019. (Read more about the review process **here**) The decision to revise FSC-PRO-01-001 V3-1 was approved by the Board attheir 82nd meeting in November 2019, based on the report findings:

The report recommended a "full revision" of the procedure based on several factors, because:

a) The last full revision was completed in 2013;
b) The process to develop and revise normative documents was/is considered inefficient and re-strictive, not allowing FSC to adapt fast enough to address challenges and seek opportunities;
c) The FSC Governance Review report made recommendations that could be incorporated to strengthen FSC-PRO-01-001 (summarized below); and
d) The strategy 1 of the Global Strategic Plan 2015-2020 called for streamlining the normative framework. In the context of the procedure this was understood as:

• Enabling normative documents to be outcome oriented and risk-based
• Ensuring all processes minimize burden
• Ensuring normative documents use plain language and are user-friendly
• Making the procedure more effective

Although the NF was not a core focus, the FSC Governance Review (published in March 2019), made the following recommendations related to the development and management of FSC norma-tive documents:

• It should be easier for members to find understandable high-level information
• FSC should engage members in smarter ways, e.g. through tools that can help to foster better discussions on policies
• Working groups should be required to work more transparently
• Members should consider listening more to certificate holders' perspective on normative docu-ments

After the Review Report was published in 2019, the new Global Strategy 2021-2026 was approved. The Global Strategy also includes goals that could be partially addressed in the revision of FSC-PRO-01-001:

1.1 Engage members and stakeholders to drive change as a community for co-creation of solutions
1.2 Streamline policies and standards towards outcome orientation
1.3 Enhance verification and integrity
2.2 Accelerate the market uptake of FSC-certified products and ecosystem services
2.3 Unleash the power of data to demonstrate positive outcomes

What are the specific issues and concerns with the current procedure?

The issues and concerns with the current procedure, raised by FSC members, stakeholders and staff, are detailed here under four overarching aims of the revision process.

1. Making the procedure more efficient

i. Adaptability

The current procedure does not take into account the different scopes and impacts of development, revision and withdrawal processes; **the same steps apply for all normative documents**. There are currently 70 documents that fall under the scope of FSC-PRO-01-001 and they are not all equal in terms of their scope of application, impact, risk or importance to the FSC system. There are also different magnitudes of changes, ranging from minor revisions to address clear gaps or differences of interpretation, to major revisions that introduce new requirements and have a large impact on certificate holders and/or the system. Following the same process for more minor revisions of documents with limited scope or impact, as for major revisions of documents that are applied by thousands of certificate holders and/or are fundamental to maintaining the integrity of the organization, makes minor revision processes cumbersome and inefficient.[9] On the other hand, the procedure may be insufficient for managing complex development and revision processes for documents with high impact and broad scope. Allowing for variability in the approach based on anticipated factors (e.g. scope of revision and impact), would require having a more accurate understanding at the onset of a revision process of the expected outcomes, which it is not always the case following the current approach.

ii. Modular review and revision processes

Another way that the procedure is inefficient is that **it was designed for revising documents one-by-one**. FSC's Normative Framework is complex in part because it is comprised of many documents that are detailed and specific to the user, source material or product, for example. This approach means that some cross-cutting topics, such as social requirements, come up in multiple documents. When a single standard undergoes a revision process, requirements are revised but if those requirements are similar or related to those in other documents, this leads to inconsistencies until all documents are eventually reviewed and revised. **There is no process for identifying modules for review and revision**. When certain topics need to be reviewed and revised for continued relevance and intended impact, there isn't an established approach for considering one topic across multiple documents in the current procedure – a modular approach. A strategic roadmap (strategy 4 of streamlining the NF discussed above) is key for providing this higher-level perspective that the procedure alone cannot provide.

---

9 Technical notes regarding FSC-PRO-01-001 V3-1: 1. There is a simplified process for "administrative revisions" in the procedure (10.5). 2. The procedure was deliberately designed to include some barriers towards quick revisions to normative documents due to concerns about frequent changes of the NF and desire for more stability and predictability. 3. The procedure allows for the Board to decide to deviate from the procedure when an alternative process would be in the best interest of FSC (16.1)

iii. Efficient and credible decision-making

According to the procedure, **nearly all decisions throughout the process of a normative document development or revision are the responsibility of the Board**. Some have questioned if it is necessary for the Board to make all of these decisions, or if it would be more effective and efficient for a Director-level position or a committee such as (or similar to) the PSC to decide in some circumstances, with veto power for the Board in those cases. For example, the decision to withdraw a document that has been superseded by another, or the decision to revise a document based on the findings of its review report.

With regards to the Board's final decision on new or revised normative documents, the procedure is clear that the Board can only request further work if it is not satisfied with the final draft, and cannot make changes directly to documents. However, it has long been common practice for the Board to make changes before approval, based on its own judgement and/or (more recently) recommendations from the PSC. Some stakeholders feel that this undermines the process whereas others feel that this is necessary (for example, to ensure auditability or compatibility with related documents), and to avoid having to send the document back to the working group for further revision – adding significant time to an already lengthy process.

2. Accelerating development and revision processes

The number one complaint regarding the PRO-01-001 is that **the overall process takes too long** – more than 2 years currently for full revisions. (See Annex 4: Recent FSC revision process timelines). This is a problem because it reduces FSC's ability to adapt fast enough to address challenges, avoid risks, and pursue new opportunities. According to ISEAL, organizations following their code of good practice for standard setting should be able to complete a new development or revision process in about one year's time, and indeed many organizations have and do. In an extreme example, the process to incorporate labor requirements (based on the ILO Core Labour Conventions) into the chain of custody standard will be a 7+ year process - from the Board's decision to develop a solution for certificate holders' compliance with fundamental workers' rights (March 2014), until the effective date (September 2021).

There are many different sources of slowdowns in the current FSC process. The key culprits are explained here.

i. Too many (and inefficient) steps before the main process even begins

Before a normative document can be developed or revised, or withdrawn, a proposal and/or review report must be developed by the secretariat. **Proposals and review reports** are circulated to the FSC Global Network, Board, Accredited CBs, and other identified stakeholders for a minimum of 30 days. Any comments received are reviewed and taken into consideration, then the final proposal or report is reviewed by the PSC who make a recommendation to the Board for their approval. This first phase of the process takes a minimum of 90 days to complete and only decides whether or not to proceed with the process. Typically, **very minimal feedback is received** through the consultation, making it quite inefficient, especially for straightforward revisions.

The objectives and aims of the new or revised document are established during this beginning phase of the process and dictate the Terms of Reference for the working group. In the case of significant changes or new ideas that have a high impact on users and/or set a new bar for the organization, **there is insufficient membership and stakeholder participation** in establishing these objectives, which can create problems and delays later on in the process. (This issue is discussed further in 4. Making the procedure more effective.)

ii. High-level, contentious topics for working groups to reach consensus on

In reviewing completed processes where the final timeline far exceeded the planned timeline, it is common to see that working group meetings either got off schedule (i.e. there were longer periods of time between meetings than planned) or more meetings occurred than were originally planned. Looking into this further, the cause for more meetings or meetings with more time between is typically that there were **high-level, contentious topics** that the group had to work through, which can **take considerable time and effort**. (This issue is also further discussed in 4. Making the procedure more effective.)

iii. Time lost in hand-offs between teams/decision-making bodies

At several stages of the process, documents need to be reviewed by various decision-making bodies. For example, final documents need to be reviewed by the PSC who make a formal recommendation to the Board on their final decision to approve, reject or request changes to a document. These meetings (of both the PSC and the Board) occur just four times per year and are scheduled a year in advance. Project timelines must be carefully planned and managed (including the numberand timing of working group meetings and public consultations) so that documents are developed and provided in time, otherwise missing a meeting delays the process by a minimum of 3-4 months.

3. Closing gaps in the procedure

i. Monitoring and evaluation (M&E)

The current version of **the procedure** makes reference to monitoring and evaluation activities in the review of existing documents, but **does not include any requirements for conducting monitoring or evaluation**. It is unclear who is responsible for the monitoring and evaluation of each or all normative document(s), when or how this should be done, and what should be monitored/evaluated. (M&E is also discussed under 4. Making the procedure more effective.) Including M&E in the revised procedure is important, but this strategy alone will not be enough to make it a reality. As discussed in the streamlining strategy, digitalization of reports and/or the use of other technologies to capture key statistics and performance indicators will also be important for making monitoring and evaluation more efficient and effective, as will the development of guidance and other supporting documents.

ii. Implementation of finalized documents

At the end of the process for the development of new normative documents, the procedure only includes requirements about the timing and content of the announcement about the final approved document. For revisions of existing normative documents, the procedure only additionally includes requirements for the timing of phase-ins and transitions from previous to new versions. In most cases, **the approved document is announced and widely released without well-coordinated and timely training on its objectives, application, or interpretation**. Upon implementation, a standard is typically applied across many regions, industries and scenarios by hundreds of different auditors. Without common training and/or coordinated calibration across certification bodies, requirements that are unclear – especially in peculiar situations – may be understood and applied differently, resulting in the need for advice notes and interpretations.

iii. Procedures for the development of advice notes and interpretations

Although new interpretations and advice notes on normative documents (especially certification and accreditation standards) are published regularly by FSC, FSC-PRO-01-001 does not include any requirements or guidance for their development.

FSC's Enquiry Procedure PSU-PRO-10-201 addresses the process to respond to requests for information, interpretation, or derogation. However, this procedure is not mentioned in FSC-PRO-01-001.

The process to prepare advice notes, on the other hand, is not yet formally established in FSC's Normative Framework.

iv. Guidance on developing outcome-oriented and risk-based requirements

Although it is already an established goal of FSC to transition its normative documents to being more **outcome-oriented** (focused on intended impacts and expectations, as opposed to only focusing on specific rules and mandated approaches) and **risk-based**[10] (focused on requirements that are most relevant to be audited), the transition process has only partially begun to date. Arguably, being 'outcome-oriented' could result in shorter documents, where the intention is clear and there is greater flexibility in how the intended outcome may be achieved by the user. This approach is expected to also reduce the need for interpretations and advice notes as the intention of the requirements will be more clear and adaptable for various situations and scenarios. **There iscurrently no mention of outcome-oriented or risk-based requirements in PRO-01-001. These terms are not yet formally defined and there is no guidance for standards developers** to use when drafting new or revising normative documents. As with M&E, revision of the procedure to include a requirement for consideration of outcome-oriented and risk-based approaches in the development/revision of normative documents will not be enough. Developing the necessary guidance, training and technology will be addressed through the other strategies of streamlining the FSC NF.

---

10 See **FSC Global Strategy 2015-2020**, 1.1.1 - Policies and standards are aligned with strategy, are outcome-oriented and risk- based, incorporate market implications, and are analysed for cost implications, while maintaining or improving social, environmental and economic results.

V. Incorporating the role of the Policy and Standards Committee (PSC)

Several years ago, the FSC Board established the **Policy and Standards Committee (PSC)** in order to streamline, facilitate and accelerate decision-making processes in relation to normative FSC documents. The PSC is a six-person chamber-balanced group of FSC members acting as advisors to the Board on a wide range of issues including the approval of new and revised international FSC policies and standards as well as national forest stewardship standards. Although the role of the PSC is well-established, it is not yet explicitly mentioned in the procedure. Those implementing the procedure cannot currently rely on this document to know when or how to involve the PSC in the process.

4. Making the procedure more effective

For FSC, as a membership-based market-driven organization, making the procedure more effective means the final documents produced following this procedure should meet their intended outcomes - environmental and social benefits/impacts and market uptake - and be supported by a balanced majority of its membership. As such, the issues and concerns related to the procedure's effectiveness are grouped under these two categories: Achieving intended outcomes and Effective stakeholder engagement.

i. Achieving intended outcomes

Monitoring impacts is essential for evaluating the effectiveness of normative documents in meeting their objectives, however, as discussed above, one of the gaps in FSC-PRO-01-001 is that the process and responsibilities for monitoring and evaluation is not included or made clear. FSC normative documents are not currently developed with **outcome indicators** in mind, so evaluating their effectiveness has been a challenge. Of course, it is one of the streamlining principles to transition to outcome-oriented normative documents, where the desired outcomes of each document are clearly stated and can then be evaluated and measured.

Pilot testing is another way to test and improve upon the effectiveness of a normative document before it is finalized, or widely implemented (e.g. after approval but before the effective date). When pilot testing is conducted, the current practice is to find applicants or certificate holders willing to undergo an assessment against the draft standard before it is finalized. This is challenging as it is time-consuming and resource intensive to go through an audit to a new/revised standard, and there are no clear benefits or incentives. There is no guarantee as to when the standard will be approved and what the final content will be. If the standard is significantly revised then a new audit may be required before certification can be granted. For pilot testing to become more effective, its methodology and timing should be reassessed.

Lastly, for a document to achieve it's intended outcomes it must be easily and uniformly understood, feasible to implement and auditable. Although it is clear in the procedure that the assigned Coordinator (FSC staff or contracted expert) is responsible for drafting, **it is unclear what the role of the secretariat is when it comes to developing the content of normative documents**. Historically, FSC staff responsible for drafting normative documents have had little, if any, experience in the forest products industry or on-the-ground certification activities and therefore must rely on the working group, public consultation and possibly pilot testing to ensure that the final document is feasible to implement and auditable. On the other hand, FSC staff typically have in-depth knowledge of the FSC NF and how the various documents fit together, and are experienced technical writers. **Some feel that FSC technical staff should be more of a participant with a voice, than the current role of facilitators and coordinators, and have a formal role in content creation** as experts in the FSC Normative Framework and normative documents, while others expressed mistrust of the secretariat in potentially catering to influential certificate holders or Board members, and prioritizing growth of certificates over rigor and credibility.

ii. Effective stakeholder engagement

The **current procedure relies heavily on volunteers** participating in working groups and reviewing and providing comments on draft technical documents, to develop effective normative documents.

The approach of the current procedure is to establish a working group for drafting new or revised normative documents, which may be either chamber (or sub-chamber) balanced or technical (see Text Box 1: Key definitions and clauses pertaining to working groups below). Since most documents include social and/or environmental requirements, chamber-balanced working groups have been more commonly established for development and revision processes, although in recenttimes there has been a shift to more technical working groups. Considering the number of new processes initiated each year and the criteria against which working group members are selected (see Text Box 1), **it has been challenging for FSC to find qualified and available candidatesto serve on working groups**. In particular, the working language of English limits participationfor many members and others are not sufficiently knowledgeable of the complex FSC system and specific requirements.

Text Box 1: Key definitions and clauses pertaining to working groups

Chamber balanced working group: a group of selected FSC members with professional experience in the field of question, to advise and provide content related input to the development or revision process of a FSC normative document, equally representing the perspectives of the social, environmental and economic chamber of the FSC membership (and southern and northern perspectives in case of a sub- chamber balanced working group).

Technical working group: a group of selected experts with professional experience in the field of question, to advise and provide content related input to the development or revision process of a FSC normative document.

Technical Expert: an experienced specialist in the field of question, invited to participate in working groups discussions as resource person.

FSC-PRO-01-001 V3-1, 3.9 Members of FSC working groups shall be selected according to the following criteria:

a) Expert knowledge and/or experience of the issue under consideration;
b) Up-to-date knowledge and experience of FSC's systems and procedures;
c) Understanding of the potential impact of a normative document on affected stakeholders;
d) Understanding of and support for FSC's mission and vision;
e) Ability to review and comment on documents submitted in the working language(s) agreed for the working group (see Clause 3.11);
f) Capacity to represent broadly supported chamber perspectives for chamber and sub-chamber balanced working groups;
g) Gender balance, where possible.

3.11 The working language of working groups shall be English, unless the Steering Committee explicitly identifies a different or additional working language.

For (sub-)chamber working groups, **it is unclear what the roles and responsibilities are for the working group members and how criterion f) "Capacity to represent broadly supported chamber perspectives", is evaluated in the selection process**. E.g. Are they expected to represent the majority opinion of their (sub-) chamber? Are they expected to consult with their chamber during the process to establish the majority opinion? If so, the procedure does not outline how FSC should support them in this, if at all. Related to this, the Governance Review found that members felt that working groups should be required to work more transparently.

Another key issue that has been raised is that **the procedure calls for working groups to reach consensus on their decisions**, which puts a lot of pressure on members of a chamber (or sub-chamber) balanced working group. Pushing for consensus can result in political compromises where there is eventually agreement, but on ambiguous or obscure requirements that each chamber interprets favorably, albeit differently.

With regards to stakeholder[11] engagement, the current procedure is focused on consultations of draft documents and includes requirements for when and how long consultations shall be open, how comments must be submitted to be considered valid, and how valid comments must be recorded and considered. **Very few members, however, are interested and able to provide meaningful input on draft technical documents**. Certification bodies, certificate holders and consultants (typically economic chamber members) are ordinarily the majority commenters, having potentially heavy influence on document content as there is **no process in the procedure for balancing comments by chamber and stakeholder category**.

As discussed, the FSC NF is large and complex and applied all over the globe by nearly 50,000 certificate holders. Considering this, some members feel that **there should be more regional capacity for increasing awareness of the FSC system and requirements, and engaging members and certificate holders in development and revision processes, including collecting verbal and written comments in languages aside from English and Spanish.** To address this, FSC has begun investing more in building regional capacities and when appropriate will even translate documents to select local languages to increase engagement.

Finally, although it is common practice for each development and revision process to have a **Consultative Forum[12], there are no requirements or guidance in the procedure for engaging with those who register**. Commonly, members of consultative forum are only shared the same draft documents at the same time as they are circulated for public consultation.

More members are interested in participating in higher-level discussions, for example on specific topics, policies and/or intended outcomes, rather than on draft technical documents. In the procedure, the objectives and aims of a new or revised document are established during the beginning "exploration phase", but this has not been considered a key part of the process and stakeholders are typically not sufficiently engaged to participate and provide comments or input at this early stage. As discussed previously, many core requirements (e.g. workers health and safety) are cross-cutting, appearing in multiple FSC documents. **With the current approach of document-by-document revisions, consultation is inefficient in soliciting input at this higher topic or module level, and ineffective in considering and incorporating stakeholder comments across multiple documents**. This contributes to stakeholder fatigue when stakeholders are asked to provide comments in relation to several separate documents over time, necessitating them to repeatedly provide comments on their central issues and viewpoints.

---

11 Stakeholders include FSC members as well as certificate holders and any other persons, groups and entities affected by or interested in FSC certification.
12 Definition of Consultative Forum: an email list of stakeholders who choose to be more closely involved in developing or revising a FSC normative document. Participants have the opportunity to provide input during the drafting and re-drafting stage of a normative document prior to general public consultation.

IV. Expected outcomes of a revised FSC-PRO-01-001 and a streamlined normative framework

Although it is not the only strategy, revising FSC's procedure for the development and revision of normative documents is of course key to streamlining the entire normative framework. The procedure is currently under revision with an established technical working group comprised of technical experts with backgrounds in several related standard-setting organizations. The revised procedure is targeted for completion by mid-2022. Once approved, it will begin to take effect on all normative document development and revision processes. It is expected that the new procedure will provide varying approaches for developing and/or revising normative documents based on factors such as scope and risk, and will close several gaps that have been identified in the current procedure. This will enable FSC to complete more timely development and revision processes while improving the effectiveness of normative documents.

Pairing the revised procedure with a strategic roadmap for the revision of existing normative documents, which will identify those documents or modules of highest priority for revision, is expected to further accelerate streamlining the NF. And identifying documents that can be combined, reduced or eliminated will make the overall NF more manageable.

At the same time, FSC is already working on the other streamlining strategies: developing guidance and best practice documents as well as new tools and technology to further enable FSC to streamline its NF.

In the medium term, once the revised procedure is in effect, it is expected that FSC's development and revision processes will be completed in a much reduced period of time. Over the following years, as all normative documents come up for review (beginning with those of highest priority), we will see FSC's NF transition from exclusively rule-based to more outcome-oriented. Through the use of technology, the normative documents will be more easily accessed, understood and relevant for specific users through the implementation of guidance documents and best practices, and application of the risk-based approach.

V. Annex

Annex 1: Explanation of FSC Normative Documents

The five (5) core themes of the FSC NF are listed here with examples of the normative documents included under each:

Themes:

Certification Requirements:

o Standards for forest management, controlled wood (for forest managers), and chain of custody

o Procedures for the evaluation of FSC values and occupational health and safety in the chain of custody, and derogations for use of 'highly hazardous pesticides' in forest management

o Plus, the 82 National Forest Stewardship Standards and 61 Controlled Wood Risk Assessments, excluded from the chart

Accreditation Requirements:

o Standards for certification body management, quality system and auditing requirement/procedures

Development and Control of the Normative Framework:

o Procedure for development of normative documents (FSC-PRO-01-001)

o Policy for pilot testing draft standards

o Glossary of terms (standard)

System Integrity:

o Procedures for processing appeals and complaints

o Transaction verification

Scope, Eligibility, Risk and National Standard Setting:

o Standards: FSC Principles and Criteria, Small and Low Intensity Forest Management Eligibility Criteria

o Policy for the scope of application of the Principles and Criteria

o Procedures for the approval of forest stewardship standards and national risk assessments

Chart 1: Distribution of FSC Normative Documents across five core themes of the normative framework

There are six (6) core document types within the FSC Normative Framework which have a general hierarchy from policy documents to interpretations. Each document type is explained below (for official definitions, see FSC-STD-01-002 in the **FSC Document Center**).

Document Types:

Policy (POL): A documented principle which is intended to further the mission of FSC, in line with the aims and aspirations of its membership.

Standard (STD): A document that sets clear requirements and expectations, established by consensus and approved by the FSC membership, Board of Directors or Board-appointed Committee.

Procedure (PRO): A document that describes the processes to be followed to meet FSC policies and standards.

Advice Note (ADV): Errata or addenda to normative documents.

Directive (DIR): A compilation of Advice Notes pertaining to a single standard.

Interpretation (INT): A formal clarification of requirements, typically compiled in an Interpretation Document specific to the normative document being interpreted. These are not considered separate normative documents, but rather clarifications of existing normative requirements. They are available in the Document Center under document type Interpretation (INT) but do not have document codes.
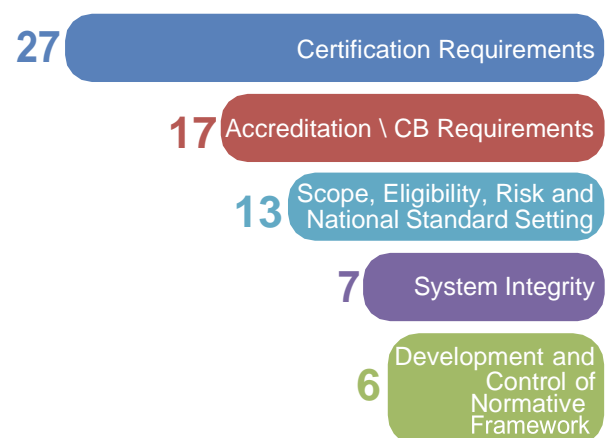

Figure: Bar chart showing distribution across themes: 27 Certification Requirements; 17 Accreditation \ CB Requirements; 13 Scope, Eligibility, Risk and National Standard Setting; 7 System Integrity; 6 Development and Control of Normative Framework

Figure 3: Hierarchy of document types

Figure: Pyramid hierarchy from top to bottom: Policy; Standard; Procedure; Advice Note \ Directive; Interpretation

Annex 2: FSC-PRO-01-001 Version History

Version 1-0 approved at the 35th meeting of the FSC Board of Directors, 27th November 2004, has been designed to comply with the ISEAL Code of Good Practice for Setting Social and Environmental Standards, and thereby to demonstrate compliance with the applicable requirements of ISO/IEC Guide 59 Code of good practice for standardization, and the WTO Technical Barriers to Trade (TBT) Agreement Annex 3 Code of good practice for the preparation, adoption and application of standards. Excerpts from the TBT Second Triennial Review Annex 4, Principles for the Development of International Standards, Guides and Recommendations with Relation to Articles 2, 5 and Annex 3 of the Agreement have also been drawn upon where appropriate.

Version 1-1 approved by FSC Executive Director, 18th February 2005 with minor changes; new Clause 16.2.

Version 1-2 was approved by the FSC Board of Directors at their 41st meeting in March 2006 with minor changes.

Version 2-0 was drafted during November and December 2006 (circulated as Version 1-3), taking into account stakeholder comments. It also includes changes necessary to address minor inconsistencies related to the ISEAL Code of Good Practice for Setting Social and Environmental Standards. It was approved at the 44th meeting of the FSC Board of Directors, with the name FSC-PRO-01-001 The Development and Approval of Social and Environmental Standards.

Version 3-0 was developed to incorporate the recommendations from the FSC working group on Motion 352[13] (GA 2008) and Motion 363[14] (GA 2011) and to align the procedure with Version 5 of the ISEAL Code of Good Practice for Setting Social and Environmental Standards (2010).

Version 3-1 was developed to incorporate the decision from the FSC Board of Directors made at their 68th Meeting on 25 March 2015 to deviate from this procedure in cases of small changes to technical normative documents or in cases of alignments of normative documents. In addition, small corrections and editorial updates were made.

---

13 Motion Title: "To implement a formal procedure for FSC standard setting that will allow for realistic implementation of standards."
14 Motion Title: "Annual Policy Manual for the FSC System, for use by accredited certifiers, National Initiatives, ASI auditors, both candidate and certified operations, and stakeholders."

Annex 3: Normative frameworks of similar certification organizations

Organization	Equivalent normative framework	Revision process
Fairtrade International	7 standards, each accompanied by a document of all interpretations for the standard.	Each standard is reviewed at least every 5 years.
Marine Stewardship Council (MSC)	3 core standards: • Fisheries • Chain of Custody (CoC) Group CoC • Consumer Facing Organisation CoC 3 core process/accreditation documents: • Fisheries Certification Process • Chain of Custody Certification Process • General Certification Requirements	Standard revisions are initiated within 3-5 years of the last approval date. (5 years for fisheries and 3 years for CoC)
Programme for the Endorsement of Forest Certification (PEFC)	3 international standards: • Chain of Custody • PEFC Trademark Rules • Certification Body Requirements 3 benchmarking standards: • Sustainable Forest Management • Group Forest Management Certification • Standard Setting 8 guidance documents, and several procedures.	The international and benchmarking standards undergo a review and revision process that begins within 5 years of the last approval date.
Roundtable for Sustainable Palm Oil (RSPO)	3 core standards: • Principles and Criteria (P&C), • Supply Chain Certification Standard (SCCS), and • Independent Smallholder Standard (RISS). RSPO also has National Interpretations for the P&C, and local interpretation for RISS.	Each standard is revised separately every 5 years.
Sustainable Forestry Initiative (SFI)	All SFI requirements are in 1 set of documents: the SFI Standards and Rules, which contain 14 sections that cover FM, CoC, Accreditation, etc.,.	All sections of the SFI Standards and Rules document are reviewed together in one review process, which must commence within 5 years of date of approval (and be completed within 7 years of the date of approval) of the current standard.

Annex 4: Recent FSC revision process timelines

Normative Document	Tittle	Type of process	Type of working group	Duration[14] (from 1st WG meeting to final approval)
FSC-STD-30-005 V1-1	Revision of FSC Standard for Group Entities in Forest Management Groups	Full revision	Technical working group	1 year, 10 months
FSC-POL-30-001 V3-0	FSC Pesticides Policy	Full revision	Chamber-balanced working group	2 years, 5 months
SC-STD-40-006 V2-0	Revision of Chain of Custody Standard for Project Certification.	Full revision	Technical working group	3 years, 7 months
FSC-PRO-60-007	Structure, Content and Development of Interim National Standards	New Process	Technical working group	2 years, 4 months
FSC-STD-60-004 V1-2	Intact forest landscape (IFL) indicators – international generic indicators (IGIs)	New Process	Technical working group	2 years
FSC-STD-40-004 V3-1	Incorporating the FSC Core Labour Requirements into the CoC standards	Partial revision	Technical working group	2 years, 1 month

14 Note: these timelines do not include the review phase or the time it took to set-up the working group.

Annex 5: FSC's Streamlining principles

At the 82nd meeting of the FSC Board of Directors (November 2019), a paper was presented that outlined eight streamlining principles for the normative framework, which were described as objectives for making the normative framework more efficient and effective. These principles are based on the FSC Global Strategic Plan 2015-2020 and in alignment with FSC's enterprise risk policy: a tool used by FSC to make decisions based on the weighing of risks and opportunities for the organization.

1. We focus on outcomes and actions that maintain **system integrity**, transparency, and credibility.

> Example: This is an overarching principle that applies to all streamlining activities.

2. We design our normative framework for its **intended users**. Forest managers, industries and companies, CBs and FSC staff are all users of our Normative Framework and deserve to receive products and services that fit well into their processes, that facilitate the implementation of FSC requirements and increase FSC value.

> Example: De-spaghettifying the NF: e.g. merge procedures / standards for setting national standards (60-series)

3. We address the **root problems and risks** which prevent us from achieving our mission.

> Example: Assurance Risk Management Plan and Risk Register

4. We focus on the outcomes we want to achieve, and orient effort to things that matter most.

Example: Develop guidance on how to formulate outcome-oriented requirements in revised **FSC-PRO-01-001** Development and Revision of FSC Normative Documents

5. We embrace **risk management** as a guiding principle to achieve efficiency and effectiveness in our normative framework and as directed in FSC's enterprise risk policy:

o In the development and revision of normative documents we assess, weigh and balance risks and benefits and adapt risk-based approaches to its users;

o Risk-based approaches allow us to focus on the relevant items within the Normative Framework as a whole and within the context of its normative documents (policies, procedures and standards).

o Risk-based approaches (definitions and concepts) are aligned over time where this is feasible and where variations of approaches (customized solutions) for users are not needed.

o Risk is considered both a threat and opportunity and included in decision-making, e.g. reflected in FSC's procedure to develop and revise normative documents.

Example: RBA for verification of CoC core labour requirements (ILO), CB requirements

6. We **integrate work streams** within the organization to learn from different perspectives (communication, marketing, etc.) and to maximize efficiencies and effectiveness.

Example: Collaboration around new product development, e.g. Ecosystem Services and New Approaches

7. We make the best use of **new technologies** in the design of our normative framework (user interface) as well as in the support we provide for its implementation (digital tools) and in our monitoring systems.

Examples: Develop IT platform for standards; online FM reporting system

8. We **monitor our impact** and learn from our successes and failures to ensure **continuous improvement** of our normative framework.

Example: Impact assessments at level of individual documents guided by revised **FSC-PRO-01-001**

www.fsc.org

FSC