



HCV RN Input to FSC P&C Revision: May 2009

Summary of Comments made by the Network's Technical Panel

1. Introduction

At its last meeting (February 2009) the HCV Network Steering Group (SG) highlighted the current FSC P&C review, and stressed the importance of maintaining a dialogue between the FSC P&C review working group (WG) and the Network, particularly with respect to the wording of Principle 9 and glossary definitions of HCV. Moreover, at that time it was agreed that Antti Marjokorpi should initially take on the role of liaising with the working group on behalf of the HCV Resource Network, and providing feedback on any potential dissonance which may emerge.

Subsequent to this, and following meetings of both the Secretariat and Antti Marjokorpi with select members of the review WG and the FSC, it was decided that there were 3 potential ways for the HCV Network to engage with the current review process:

1. By requesting comments from the Network Technical Panel (TP) on P9 which the Secretariat would collate and forward directly to Tim Synnott to pass on to the WG.
2. By alerting the Network's circulation list (via an email briefing) when the first public consultation opens (and to subsequent ones), which could also be advertised through the Network's website, with a direct link to contact the FSC as appropriate.
3. By applying for membership of the Advisory Group (AG).

This last suggestion was not pursued further as it was recognised that many individual members of the Network SG and/or TP may be involved in the AG as representatives of their own organisations rather than the Network; the second suggestion will be acted upon when the public consultation phase opens.

The HCV Network Secretariat has however pursued the first action by seeking the views of the TP. In total, 7 members of the TP responded from a range of geographical regions (South-east Asia, South America, South Africa, Canada and Russia) and covering both social and ecological expertise. The main points raised are summarised below (a separate spreadsheet detailing all of the individual TP member comments has also been compiled).

2. HCV Technical Panel comments - summary

2.1 General wording of Principle 9

Maintenance of high conservation value forests: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.

The TP agreed that the Principle should be re-worded (and appropriate changes made in the corresponding wording of C9.1 and the glossary) to refer to **High Conservation Values** (rather than High Conservation Value Forests), both to clarify the intent and so as to be applicable to other ecosystems. The example of the South Africa standard, where the definition had been expanded to include non-forest ecosystems was cited; in this context it was noted that formal endorsement of this definition from the FSC would help with respect to the opposition of some forestry companies.

2.2 General wording Criteria 9.1 - 9.4

One TP member felt that all the Criteria needed the clause “*appropriate to scale and intensity of forest management*” (as in C9.1), especially C9.4 (also see below).

- a) C 9.1 “*Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.*”

The TP suggested that HCV assessments need to consider more than just the site and should consider the wider context - in line with internationally accepted systematic conservation planning approaches, which set targets based on what is achievable through the current protected areas network - [NB. This is incorporated in the Guiding Principles of the HCV Network Charter]. Additionally it was noted that in the South African standard, the clause “*Assessment report is updated every five years or as new and applicable information is made available*” has been included under this criterion.

A view from Russia suggested the need to include the word “mapping” to this criterion as it was felt that both assessment reports and maps for the different categories of HCVs were needed.

- b) C 9.2 “*The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.*”

The TP felt that there was a need to clarify that the required consultation was to be conducted by the forest manager rather than the certification body. In South Africa, the criterion has been interpreted as: “*...requires forest managers to consult with stakeholders during the identification of HCV attributes and on the options for the maintenance of any High Conservation Values that are identified. This requirement places a safeguard on the management of HCVFs as it allows stakeholders to raise significant and credible points that may be important in maintaining or enhancing the identified HCV*”, - this wording was suggested as a way of removing the ambiguity.

It was also noted that there is a need better to define credible stakeholder consultation with respect to the social conservation values, especially with respect to the formulation and finalization of the management plan e.g. by considering who needs to be included, and how the consultative inputs are used.

- c) C 9.3 *"The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary."*

In the case of South Africa, it was noted that concerns had been expressed regarding the need to include the specific measures in the publicly available summary or if alternatively forest managers could provide the full management plan to any interested and affected parties on request.

- d) C 9.4 *Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.*

The issue of annual monitoring was raised from a number of TP members: to start with it was felt that in the case of small scale / community forests, this was likely to a particularly onerous requirement especially if the management intensity was generally low. It was felt that this could be addressed by adding a rider to the effect of *"where there is an indication that the identified values may be threatened"*.

Additional comments (both from South Africa and Canada) were related to the prohibitively expensive and occasionally impractical nature of annual monitoring; it was suggested that the wording may be revised, and the word "annual" removed, to ensure that monitoring intervals were documented and justified on the basis of the conservation values identified. It was noted that in South Africa this had been addressed by including the clause *"Findings and corrective actions from the HCV monitoring programme are incorporated into the implementation and revision of the management plan"* in the standard. The TP also noted the need to consider different kinds of monitoring both for different values, and for the different types of threats the values may be subjected to.

2.3 Glossary definitions

High Conservation Value Forests are those that possess one or more of the following attributes: a) forest areas containing globally, regionally or nationally significant : concentrations of biodiversity values (e.g. endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance; b) forest areas that are in or contain rare, threatened or endangered ecosystems; c) forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control), d) forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).

In addition to the previously documented recommendation to change the definition from HCVF to HCV in order to include other valuable ecosystems (and corresponding changes to the listed HCV attributes), TP members recommended that the FSC should recognise that practitioners routinely split the 4 attributes of HCVFs listed in the Glossary into 6 HCVs (as defined in ProForest's HCVF toolkit of 2003).

With respect to specific attributes, it was noted that the definition for large landscape-level forests (included in “*attribute a*”) is hard to translate to other ecosystems, and that “*attribute b*” should be reworded, as it currently suggests that a forest manager should ensure that the forest remains in a rare, threatened or endangered ecosystem.

The TP strongly recommended that the FSC should endorse or recognise the global HCV toolkit, and also consider how to recognise the national interpretations of this. The TP highlighted the need to distinguish between the areas in which the HCVs are present, and areas which need to be managed in order to maintain or enhance HCVs. It was suggested that the FSC take into account the guidance and definitions which have evolved from the original FSC standard and which are now incorporated in other sustainability standards, guidance documents and HCV toolkits (as in the box below, compiled from several sources).

Clarification of HCV definitions – compiled by HCV Network secretariat

The HCV concepts currently in use have been defined in several ways in different normative standards and guidance documents. There is an important distinction between Values (i.e. important attributes) and Areas.

Values: in line with the FSC definition of HCVF in the FSC Standard, the HCVF Toolkit (2003) defines an HCV as 'a biological, ecological, social or cultural value which is considered to be of outstanding significance or critical importance at the national, regional or global scale'. This has been used as the basis for defining HCV categories and thresholds of importance in nearly all existing national interpretations of HCVF toolkits.

Areas: in existing sustainability standards and HCV toolkits, HCV Forests or HCV Areas have been defined in two different ways:

- *Definition 1:* “HCV Forests [or Areas] are areas which possess one or more [HCV] attributes” [this is the FSC Glossary wording, which applies to Forests only]. This definition describes a spatial boundary for the occurrence of one or more HCVs.
- *Definition 2:* “HCV areas are critical areas in a landscape which need to be managed appropriately to maintain or enhance one or more HCVs” [this is the HCV Network Charter wording]. This definition describes a spatial boundary for the area where specific management is required.

The second definition can be more explicitly described as an HCV Management Area, which is the approach that has been adopted e.g. by the Indonesian HCV Toolkit revision of 2008.

NB: The FSC Glossary definition defines HCV Forests as forests which possess one or more attributes, but each of these attributes (Glossary definitions a-d) is actually defined as a forest area containing or protecting the relevant attribute.

An additional suggestion made by one TP member was that the FSC now needed to define the Precautionary Principle (based on the previously published discussion paper by Tim Synnott), and add it to the Glossary

2.4 Additional comments

a) *HCV assessments and maps*

One of the TP suggested that maps of areas with identified HCVs should be made public, whilst another questioned whether the assessment reports themselves (or summaries) should also be mandatory public domain.

b) *Relationship of P9 with the other Principles and Criteria*

The request for feedback on P9 stimulated some general debate amongst the TP as to the relationship of this specific Principle with the others; it was argued that the addition of an HCV sub-section to a number of the existing principles might be more appropriate. However, on balance it was felt that there were a number of compelling reasons for retaining P9 as an embodiment of the explicit HCV concept, including its role:

- As a significant communication tool (i.e. focusing attention on HCVs)
- In providing the FSC with a competitive advantage