

Confor response to FSC Continuous Improvement Framework consultation

Confor is the not-for-profit organisation for sustainable forestry and wood-using businesses in the UK. We have more than 1,500 member companies representing the whole forestry and wood supply chain. Confor focuses on the strategic issues that are vital to the success and sustainable future of the sector. These include helping to build the market for wood and forest products, creating a supportive policy environment and helping members to become more competitive and successful.

1. What is your name? (optional)

Andrew Heald

2. In which region are you located?

Europe

3. How would you define yourself?

FSC Member

4. Have you participated in one of 15 consultation workshops on the Continuous Improvement Framework?

No

5. In which country?

You didn't answer

6. Do you consider that FSC should have different certification options suitable for smallholders and communities, or should the standard and rules for obtaining FSC brand be the same for all?

The standard and rules must be the same for everyone.

Other (specify):

You didn't answer

7. Would you recommend that FSC implement a Continuous Improvement Framework that allows communities and smallholders to gradually comply with the standard requirements?

Yes

Why?

I would argue that a "continuous improvement framework" has always existed. We have never expected an "organisation" to be 100% compliant. We have used "Corrective Action Requests" to identify issues that need to be improved and then depending on the severity of the non-compliance given the organisation a period of time (up to a year) to be compliant.

8. Some people think that it is a risk for FSC to allow Organizations, which have not yet fulfilled 100% of the requirements of the standard FSC to be

certificate holders. What do you think?

I think it is a manageable risk for FSC because smallholders and the communities will comply with all standard requirements within a 5-year threshold and, if it doesn't occur according to an approved work plan, anyway the certification will be suspended.

Other (specify):

We already do this! That's why we issue "Corrective Action Requests".

9. Do you think that an FSC Continuous Improvement Framework will ensure that a significant number of smallholders and communities will seek FSC certification of their forest management units.

No

Why?:

It will help but it does not address some of the bigger barriers to small holders.

10. Do you consider that a Continuous Improvement Framework is a good step for FSC to facilitate access to FSC certification, but will not significantly increase the number of smallholders and communities that seek FSC certification for their forest management units?

Yes

Why?

It will all help and it will help improve and support, a risk adjusted framework - but it is NOT a magic bullet.

11. How much time do you think should be given to meet the criteria for continuous improvement of category 2?

1 year

12. How much time do you think should be given to meet the criteria for continuous improvement of category 3?

2 years

13. Do you have any proposal or suggestion regarding the definition of smallholders and communities in the FSC system?

Allowing national definitions is fine but demonstrates some of the fundamental challenges. Would a co-operative company like Sodra qualify as a community ?

14. What other actions or changes in the system do you think FSC should take to increase the number of smallholders and communities that seek FSC certification of their Forest Management Units?

Encourage the development of very large group schemes, and amalgamating of forest management units; this will reduce auditing frequency and costs. The current policies and auditing practice of ASI are discouraging some group schemes from offering their services to smallholders.

15. Do you have any other opinion or question regarding the report you would like to share with us?

Broadly welcome this approach, but there is some flexibility in the existing FSC Group Scheme system to support small holder certification. The challenge is that many markets for small holders products aren't that interested in paying extra for certified material.

Andrew Heald

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