Comparison
Between IUCN
Green List for
Protected Areas
(GLPA) and Forest
Stewardship
Council (FSC)
Standards

Client: IUCN
Date: 19th August 2014
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19th August 2014

Section 1. Introduction and Overview

This report was commissioned by IUCN to provide background information for discussions between IUCN and FSC as to the relationship between the IUCN Green List for Protected Areas (GLPA) and FSC proposals to apply the FSC Principles and Criteria to the certification of protected areas.

The report summarizes the findings of a detailed, indicator-by-indicator analysis of the FSC IGI V1-0 Draft 2.0 (the ‘FSC Generic Indicators’) compared against the first version of the Green List for Protected Areas Global Standard (15th May 2015), and the associated draft generic indicators (‘GLPA Generic Indicators’).

Background information has been presented in the Annexes, so that the main report can focus only on presenting the main findings. The specific terms of reference are given in Annex One. Annex Two provides a baseline description of the FSC and GLPA Standards, considering their current status, their structure, scope, the potential for variation at the level of Indicators, and the basis for certification. This information provides necessary context for the subsequent detailed comparison of the standards’ content at the level of indicators. A description and explanation of the methodology for the detailed comparison is provided in Annex Three, and the data from the comparison itself are given in Annex Four and Annex Five, submitted separately. Annex Four lists the full set of GLPA Generic Indicators in table format. For each GLPA Indicator it provides a cross reference to, and the text of, the relevant FSC Criteria and Generic Indicators that address the same, or similar requirements. Annex Five lists the full set of FSC Generic Indicators, also in table format, cross-referenced to the GLPA Indicators to which they contribute. Definitions of key terms, as defined by FSC and/or GLPA, are given in the Glossary.

Key issues raised for the analysis based on consideration of the baseline descriptions in Annex Two are presented in Section 2, below.

The main findings from the Indicator-level comparison of the FSC and GLPA standards are presented in Section 3.

Finally, Section 4 summarises the conclusions and recommendations that are drawn from the analysis.

Section 2. General Comparison of GLPA and FSC Standards

The current status, structure, scope, potential for variation in the implementation of standards at the level of Indicators, and the basis for certification for the GLPA and FSC Standards are described in detail in Annex Two. Key findings and conclusions are summarized below.

2.1 Differences of Scope

The scope of application of the FSC Standard is to forests, and to other (non-forest) land-uses involving the growing of trees including such land uses as they contribute to FSC’s mission of promoting environmentally appropriate, socially beneficial, and economically viable management of the world’s forests. Non-forest areas within the boundaries of FSC-certified Management Units may also be covered by relevant FSC requirements, but there is a general carve out for ‘agricultural production systems’. The scope of the GLPA Standard is all Protected Areas that meet the IUCN
definition of a Protected Area. Figure 1 compares the scope of application of the FSC and the GLPA Standards based on these definitions.

The figure provides the basis for a discussion of the implications for areas in three categories: areas that are within the scope of both an FSC scheme and a GLPA scheme; areas that are outside the scope of either scheme; and areas that are within the scope of one scheme but outside the scope of the other.

2.1.1 Areas outside of the scope of either scheme

Areas that are outside the scope of either scheme will be areas that are not Protected Areas according to the IUCN definition, and that are not forests, do not involve the management of trees, or are non-forest areas whose management does not contribute to the FSC mission. These areas will include a wide variety of agricultural land uses, open seas, unprotected coastal areas and wetlands. These areas may include a variety of important conservation values, but improvements in their management would not be open to direct incentives provided by either scheme. These areas are not of particular interest to a discussion of the interaction between FSC and GLPA standards. There are however other mechanisms that may cover important aspects of management, including basic environmental and planning laws, and specific schemes applicable to different production systems (e.g. for sustainable agricultural production or fisheries) or environmental impacts (e.g. responsible water management or greenhouse gas emission).

2.1.2 Areas within the scope of one scheme only

Protected Areas that meet the IUCN definition, but which are neither forests nor non-forest land-uses involving the management of trees and contributing to FSC’s mission, are eligible for GLPA certification but not FSC certification. Such areas would include Protected Areas that are wetlands, marine protected areas, and a range of other non-forest land uses that may be protected.

Forests and related non-forest areas that are not Protected Areas according to the IUCN definition are eligible for FSC certification but not GLPA certification. This would include a wide range of plantations and forests that may or may not be managed commercially, as well as non-forest areas involving the management of trees. It also includes some non-forest areas within FSC-certified Management Units, to which aspects of the FSC Standard apply.
Perhaps the first point to note in relation to these areas is that an FSC Protected Area certification scheme cannot cover all kinds of Protected Areas, unless FSC’s mission statement is substantially modified.

A second point is that it provides a framework to consider the possibility of negative interactions between an FSC scheme and a GLPA scheme, in the areas that do not overlap. It is not obvious how GLPA certification of Protected Areas outside of FSC’s scope could have a negative impact on FSC’s mission. In theory it is possible that FSC certification of protected areas that do not meet the IUCN definition could have some negative impact on the GLPA mission, in that it could create confusion as to what is a ‘protected area’, or, if these protected areas support management practices that IUCN considers are negative (as opposed to, simply, insufficient to be considered a formal Protected Area). If such concerns are identified (and considered significant) it should be possible to mitigate them by agreeing constraints on the definition of a protected area to be adopted by FSC, and/or by specifying constraints on the claims that FSC-certified protected areas would be able to make.

Finally, it is worth noting that although forests that not in Protected Areas are not eligible to apply for GLPA certification, the state of these forests from a conservation perspective is clearly of importance to IUCN’s overall mission, as well as to FSC’s. Moreover, areas outside the boundaries of Protected Areas often have important impacts on the achievement of a Protected Area’s objectives, as discussed briefly in 2.1.4 below.

2.1.3 Areas within the scope of both schemes

The more substantial area for discussion in the context of this study is the potentially large area of overlap in the scopes of the two schemes, consisting of Protected Areas according to the IUCN definition, but that are also forests or non-forest land-uses that are deemed to contribute to FSC’s mission.

The simplest examples of land in this category would be forests that are designated for protection as strict nature reserves or wilderness areas – IUCN Protected Area Management Categories Ia and Ib. These areas could in principle apply to be certified by FSC, by GLPA, or by both.

But a range of other land uses is included in the IUCN definition of Protected Areas, including National Parks (Management Category II), Habitat/species management areas (Management Category IV), Protected landscapes (Management Category V) and Protected areas with sustainable use of natural resources (Management Category VI) (see Glossary for full definition). Such areas may include a mosaic of fairly intensively managed land, rural populations and more natural areas. Similarly, FSC’s scope of forest and non-forest land uses may include areas of land with a mosaic of forested and non-forested areas. In these situations one can envisage an area of forest that might wish to apply for FSC certification within a larger GLPA-certified protected area, or, conversely, a large FSC-certified area that might wish to seek GLPA certification for a particular area managed for habitat/species management.

In short, a large area of land under quite a wide variety of management regimes is potentially eligible to apply for FSC certification, GLPA certification or both, and in various combinations.

2.1.4 Areas outside the boundary of the core management area

Both the FSC and GLPA schemes require consideration of areas that are outside the boundary of the specific area applying for certification. The GLPA Standard explicitly requires that conditions beyond the boundary of the Protected Area are taken into account in determining whether the Protected Area is achieving success in relation to its core objectives. If conditions beyond its boundaries threaten the achievement of those objectives, the Protected Area should not be certified. Similarly, the introduction to the FSC Principles and Criteria states that “… some of the Principles and Criteria apply beyond the boundary of the Management Unit…”. Consideration of areas outside the boundary of the core management area creates further possibilities for interaction between the two standards systems. For example, there is potential for FSC certification of areas outside the boundary of a Protected Area to satisfy requirements for GLPA certification of the Protected Area. Conversely, it would be possible for GLPA certification of an area outside the boundary of a forest applying for FSC certification to reduce the need for, or cost of, inspection to meet some FSC requirements.

2.1.5 Conclusions
The potential for overlap and other interactions identified above raises a range of questions:

- What would be the differences on the ground, and in terms of outcomes, if an area chose to comply with one or the other standard?
- What would be the implications (positive or negative) for FSC’s mission and for IUCN’s mission of any such differences?
- Are there other negative or positive implications of a choice of certification options, in addition to any differences in standards?
- How might potentially positive implications be encouraged or increased, and potentially negative implications be minimized?

Answering these questions requires consideration of the similarities and differences between the standards, but also consideration of how the standards might be applied in a wide range of different situations, including situations involving a mosaic of areas with multiple landowners and quite different land uses. It ultimately requires considerations of costs of verification and the potential for minimizing those costs, as well as the potential benefits of certification under the different schemes and the potential for maximizing those benefits. This study focuses only a comparison of the technical content of the standards themselves, as baseline information for broader consideration. It does not consider issues such as the potential for or implications of competition between the two systems, nor the potential benefits of cooperation. However, before analysing the content of the two standards in detail it is necessary to understand the standards’ structures, and how the standards are designed to be implemented, and to consider how these elements affect the comparison of content.

2.2 Basis for Comparison of Standards

The GLPA and FSC Standards have essentially the same structures. Each is divided into high level ‘Principles’ (FSC) or ‘Pillars’ (GLPA), subdivided into ‘Criteria’. In both cases the Principles/Pillars and associated Criteria are intended to be global in their application, and are in principle applicable to all certification applicants, without modification1. Both systems provide for the possibility of some variation at the level of Criteria, through the specification of additional for application in specific geographical or ecological situations (see below). In both cases the basis for certification is a determination as to whether all the Criteria have been met, and in both cases this determination is decided by evaluating compliance with sets of ‘Indicators’.

This hierarchical structure makes it challenging to compare the two standards. In theory one needs to ask whether the two sets of Criteria are equivalent. However, because compliance with the Criteria of each standard is determined by evaluation at the level of Indicators, equivalence is determined by asking whether compliance with the set of GLPA Indicators would ensure that the FSC Criteria are met, or, in the other direction, whether compliance with the set of FSC Indicators would ensure that the GLPA Criteria are met. This could either be done by demonstrating that compliance with the Indicators for one standard would guarantee compliance with the Indicators of the other, or by demonstrating that compliance with the Indicators of one standard would guarantee compliance with the Criteria of the other.

Either approach is problematic because the specific wording of the Indicators is tied to the specific wording of their respective Criteria. Different Criteria in the two standards may use different technical terms and somewhat different approaches, even when they are trying to achieve or assess the same outcome. It is inevitable that the Indicators of one standard do not map exactly onto the Criteria or the Indicators of the other.

Analysis at the level of Indicators is necessary in order to assess ‘technical equivalence’ – whether compliance with one standard would be sufficient to demonstrate compliance with the other (or, more likely, with specific Criteria of the other). However it will still be necessary to consider whether any identified technical differences are really significant, or whether they simply represent different ways of measuring or testing conditions at a site, and would be expected to result in essentially the same outcome. This distinction between ‘technical equivalence’ and a broader ‘general equivalence’ is returned to later in the discussion in Section 4.

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1 In the GLPA system the possibility of modification of Criteria has not been definitively ruled out in the long term, though the system as being piloted currently does not allow for this.
2.3 Implications of variation at the level of Indicators

The comparison is complicated further by the potential for variations within each Standard resulting from variation at the level of Indicators, and flexibility in the definition of ‘compliance’.

Both FSC and GLPA systems provide for the development of distinct sets of Indicators for application in distinct geographical, ecological and/or technical situations. The intent is to allow the development of more specific requirements that are fine-tuned to specific situations, and so provide clarity as to how to meet the respective standard’s Criteria in those situations. For example, in both systems there is the expectation that there will be Indicator sets that are developed for application in specific countries or regions. In GLPA’s case Indicator sets may be developed for application to marine Protected Areas, to Protected Areas designed for the conservation of tigers, or for the conservation of rhinos. In FSC’s case there are Indicator sets for the assessment of ‘small and low intensity managed forests’.

In both the FSC and GLPA systems specific Indicator sets are expected to be based on that system’s Generic Indicators. In both cases they are required to provide a sufficient basis for determining compliance with the standards’ global Criteria. Nonetheless, the detailed specifications will be different, and, as noted above, this will mean that technical equivalence between FSC and GLPA standards should in theory be assessed for every different Indicator set – which would be highly impractical. More realistically, as in this study, comparisons will be at the level of the systems’ Generic Indicators. But in this case it must be noted that the findings of the study are not definitive – there is room for variation in both systems that will not be taken into account.

In addition, both FSC and GLPA Generic Indicators are themselves open to some level of interpretation. Both systems provide guidance, and explanatory notes, and it is expected that further interpretation and guidance will be developed over time. However, an initial comparison has to make interpretations without reference to the parent bodies. Either body might interpret its own requirements differently to the interpretation on which the analysis is based.

Finally, both systems provide the possibility of ‘minor non-conformities’ with the specified Indicators being acceptable in the field, for at least a limited period, whilst an area remains certified. Although in both systems there is an expectation that minor non-conformities will eventually be corrected, experience suggests that minor non-conformities may persist for some time. Nor is it the case that assessments will always identify all non-conformities in the first place, given that the areas covered by certificates may be large and diverse. It should not be assumed that a certificate issued by either system provides a cast iron guarantee that there will be zero non-conformities with the given standard within the certified area at all times.

In summary, for a range of reasons, a detailed technical analysis of the GLPA and FSC standards needs to be treated with some caution. It is necessary to carry the analysis out at the level of Indicators, as this level provides the best way to assess technical equivalence. However, it should be borne in mind that given the potential for variation in the implementation of the two standards in terms of the specification of Indicators, their interpretation, and implementation in the field, the findings from the analysis cannot be definitive.

Notwithstanding these major provisos, the analysis should provide a general indication of the areas of overlap between FSC and GLPA requirements, an indication of major differences and gaps, and point to areas where additional guidance or requirements could be developed to reduce the gaps and differences if that is considered desirable.

2.4 Potential for Alignment

Finally, the baseline descriptions of the two standards provides a basis for considering the options for reducing gaps and differences.

Options may be considered at the level of Scope, Criteria, Indicators or general guidance on interpretation. The potential to implement available options may also be assessed in terms of timing and practicality.

In terms of timing and practicality, both GLPA and FSC have their own governance structures and procedures that need to be met. It is assumed in both cases that the organizations’ objectives and missions, as stated, are not open to change. It is also assumed that the standards’ structures and general design are fixed at this point.
2.4.1 Potential for alignment by FSC

For FSC, any changes to the FSC Principles and Criteria including the Preamble, the Principles, the Criteria and the Glossary of Terms would need to be approved by a formal vote of the FSC membership. FSC has recently completed a full review and revision of the Principles and Criteria and so changes at this level can be effectively ruled out for the foreseeable future. The FSC Generic Indicators are at a final stage of revision, and are scheduled for approval by the FSC Board of Directors later in 2014\(^2\). Subsequent changes would need to subject to public consultation and Board-level approval, which is likely to be considered impractical in the short to medium term.

FSC has also developed a version of its Generic Indicators that includes ‘Instructions for Standards Developers’, giving quite specific guidance on the meaning and intent of the Indicators, and which are expected to become normative for the future development of FSC Standards.

FSC’s system for the development of specific Indicator sets is based on Standards Development Groups with specified geographical territories. An approved Standards Development Group may develop a standard with a specific technical scope within that territory. So a Standards Development Group could propose to develop a standard for application to Protected Areas within its territory. A Standards Development Group could also develop specific Indicators within its general national standard that are applicable only to Protected Areas, or that include guidance as to how they should be applied in the case of Protected Areas, so long as these are compatible with any rules or requirements specified by FSC internationally.

In the past, FSC has developed international guidance on the application of the FSC Principles and Criteria for Small and Low Intensity Managed Forests (SLIMFs). It is then up to each national Standards Development Group to follow this guidance in the development of its own standards. In principle, FSC could follow a similar process for the development of international guidance on implementation of the FSC Principles and Criteria in Protected Areas. National standards development groups are permitted to specify additional Criteria, as well as Indicators for the assessment of Criteria, and it seems reasonable to assume that international guidance on the FSC certification of Protected Areas could similarly specify additional Criteria, if this is considered appropriate. National Standards Development Groups would then be required to ensure that any standards developed at national level would be compatible with this international guidance.

In summary, FSC is unlikely to be able to consider any changes to its Principles, Criteria or Generic Indicators in the foreseeable future. Any changes to FSC requirements to increase alignment between FSC and GLPA standards would need to work within this basic constraint.

FSC would be able to consider the development of Indicator sets for application to Protected Areas at the national level, and/or international guidance on the development of such Indicator sets, including guidance in relation to the scope of such national level standards.

2.4.2 Potential for alignment by GLPA

In comparison to FSC, GLPA is at an early stage of development, and so in general has the potential to make relatively high level changes more easily.

GLPA’s Pillars and Criteria are still in an initial stage of development, approved by the IUCN GLPA Steering Group for implementation for a pilot phase, but subject to review and possible revision at the end of the pilot phase. The current GLPA Standard includes a series of Guidance Notes, that have the same level of approval as the Pillars and Criteria, but which are considered to be non-normative. GLPA has the option of developing additional Guidance Notes on the application of the Criteria in the context of forested Protected Areas. Revision of the Pillars, Criteria and/or their associated guidance would require public consultation and consultation with GLPA Jurisdictional Reference Groups, but final approval would be at the discretion of the IUCN Standards Group and Steering Group.

The GLPA Generic Indicators are at a first draft stage. They have not been formally reviewed or approved by the GLPA Steering Group, and must be considered to be a preliminary interpretation of the requirements for compliance with the GLPA Standard.

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\(^2\) A revised draft is due to be published after the finalization of this report. Further revisions may be made before a final draft is submitted for Board approval.
GLPA has the option of convening a ‘Forested Protected Areas Jurisdictional Reference Group’ with a remit to develop a set of Indicators specific to application to forested areas. Clarification would then be required as to how this Indicator set would interact with overlapping sets of Indicators developed by geographically defined Jurisdictional Reference Groups.

GLPA is not at the same level of institutional development as FSC. In general it is less constrained by existing systems and procedures, with the principle constraint being the oversight by the IUCN GLPA Steering Group, acting on behalf of IUCN.

Section 3. Comparison of GLPA and FSC Standards at Level of Indicators

Notwithstanding the provisos explained in Sections 2.2 and 2.3 above, the main focus of this study is a detailed comparison between the FSC and GLPA Standards at the level of Indicators. This Section focuses on the extent to which compliance with the FSC Generic Indicators could be used as a basis for demonstrating compliance with the GLPA Standard.

The methodology is explained in Annex Three, and the detailed findings are presented separately in Annexes Four and Five. Annex Four shows, for each GLPA Generic Indicator, the set of FSC Criteria and Generic Indicators that address the same, or similar requirements. Annex Five then lists, for each FSC Criterion and Indicator, the GLPA Indicators to which compliance with those FSC requirements contributes. The findings from the analysis are summarized in Sections 3.1 and 3.2 below.

It should be emphasised that the methodology used for this analysis assesses strict technical equivalence, as introduced in Section 2.2. Consideration of softer ‘general equivalence’ is deferred to the discussion in Section 4, to follow.

3.1 The extent to which compliance with FSC requirements should ensure compliance also with GLPA requirements

Table 1, below, summarizes the extent to which compliance with the FSC Generic Indicators should be a sufficient basis to demonstrate compliance with GLPA requirements.

Cells highlighted in green identify GLPA Generic Indicators that would be met if the FSC Generic Indicators are met. Cells highlighted in orange identify those GLPA Generic Indicators that would not be reliably met on the basis of current FSC requirements. Cells that are not highlighted show areas where a clear decision could not be made without clarification or further information.

Given the potential for interpretation and the need for judgment in relation to both FSC and GLPA requirements the findings in the table may be considered indicative rather than definitive.

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Table 1. Summary of the detailed analysis provided in Annex Four (submitted separately)

3.1.1 Areas of existing compliance

It is clear from the quick overview of Table 1 that FSC certification would be expected to satisfy a significant number of the GLPA requirements, even in terms of strict technical equivalence. According to this analysis nineteen (19) out of a total of ninety-four (94) GLPA Indicators (~20%) should be met in Protected Area certified to FSC requirements, without the need for any further analysis.

At the level of GLPA Criteria, three (3) out of a total of twenty (20) GLPA Criteria (15%) would be met. Criteria that would be met are C2.4 (relating to dispute resolution), C3.1 (the existence of management planning documentation) and C3.2 (effective management).

3.1.2 Potential for compliance dependent on minor / technical changes, interpretations or guidance

A second level of analysis can be carried out on the basis that relatively minor ‘technical’ changes are made to the FSC requirements, in the form of clarifications, guidance or additional specifications that could be included at the Indicator level. Whilst ‘relatively minor’ changes may still be significant, it is proposed that they are potentially simple to specify.

The following changes might be considered relatively minor:

C1.1: specify that Protected Areas must meet IUCN definition of a Protected Area, and be listed correctly on the World Database of Protected Areas.
C1.5: provide guidance/ additional specifications in relation to the legality of the establishment of the Protected Area.
C2.1: provide guidance/ additional specifications in relation to the Protected Area’s governance structure.
C2.2: specify additional provisions for stakeholder participation in the review and revision of the Protected Area’s management goals.
C2.3: provide guidance/ additional specifications in relation to the publication of annual budgets, the membership of decision-making bodies, the timing of publication of decisions, and the minimum requirements for regularity of public meetings.
C3.3: provide guidance/ additional specifications in relation to the need to identify ‘cultural values associated with the Protected Area’
C3.8: provide guidance/ additional specifications in relation to the assessment (and recording of findings) of the adequacy of infrastructure, equipment and staff numbers to implement the management plan, and determination of measures to demonstrate ‘respect’, ‘nurturing’ and ‘well-being’ of staff.

If these changes were made an additional sixteen (16) GLPA Indicators could be met through FSC certification, bringing the total to thirty-five (35) (shaded in green in Table 2). At the level of GLPA
Criteria an additional five (5) Criteria would now be met: C1.1 (the articulation and listing of core values); C2.1 (legal, equitable and effective governance); C2.2 (participation in planning); C2.3 (transparency and accountability); and C3.3 (management of social aspects).

On this basis thirty five (35) out of ninety four (94) GLPA Indicators (~37%) and eight (8) out of twenty (20) GLPA Criteria (40%), including all of the Criteria of Pillar Two (Equitable Governance) may be considered to be met on the basis of technical equivalence between GLPA and FSC requirements.

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<td>3.8.5</td>
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</tbody>
</table>

Table 2. GLPA Indicators that could be met, with relatively minor clarifications, guidance or 'technical' additions to FSC Indicators.

3.1.3 Outstanding Issues

Table 2 shows that more than a third of the requirements for GLPA certification would be met on the basis of conformity with FSC requirements. However, it also identifies the remaining issues where FSC certification would not be sufficient to demonstrate compliance with GLPA requirements without more substantial changes (cells shaded in orange), or where clarification is needed and does not seem straightforward (the un-shaded cells).

Key issues in these categories include:

- Explicit Protected Area design and planning around nominated values (GLPA C1.2)
- Identification, planning and management of threats to nominated values (GLPA C1.3)
• Identification of the full range of values of an area that may be, or have been, affected by the Protected Area’s establishment, and subsequent explicit analysis of the positive and negative impacts of PA establishment and management on the surrounding area. (GLPA C1.4)

• The treatment of disputes relating to the establishment of the Protected Area, and/or the way that land acquisition or involuntary resettlement took place when the Protected Area was established (GLPA C1.5)

• The design of a work program built explicitly around the identification of threats (including long term threats), target levels of threat control, and threat management and monitoring (GLPA C3.4)

• Issues related to visitor access, including the determination of visitor numbers and the quality and management of visitor facilities (GLPA C3.5)

• The concept of explicit ‘performance thresholds’ defining the successful protection of the Protected Area’s nominated values, and associated requirements relating to the measurement and monitoring of performance compared to these thresholds (GLPA C3.6, and related elements of GLPA C3.7)

• The achievement of the explicit performance thresholds specified in GLPA C3.6 (GLPA C4.1, C4.2 and C4.3).

Resolution of these issues may be challenging because the underlying issues themselves are difficult to resolve (e.g. how to address historical practices that would not be considered acceptable today, but which may have been considered acceptable in the past). Or they may be challenging because the particular technical approach that is embedded in the GLPA standard differs from approach embedded in the FSC standard, and it is hard to marry up the different requirements even if the eventual outcome might be similar (e.g. GLPA’s focus on nominated values, threats to those values, and performance thresholds for success, compared to FSC’s listing of specific values and threats, and related requirements for actions and practices). In other words, although the standards are not technically equivalent, they could nevertheless be considered to be generally equivalent, as discussed in Section 4.

3.2 Elements of FSC compliance that do not contribute to GLPA compliance

The analysis above is designed to consider the extent to which compliance with FSC requirements would be expected to guarantee compliance with GLPA requirements. It does not, however, consider equivalence in the other direction – the extent to which compliance with GLPA requirements would ensure compliance with FSC requirements. Some light can be shed on this question on the basis of the analysis in Annex Five.

Annex Five provides a listing of the FSC Criteria and Generic Indicators, cross-referenced to the GLPA Indicators to which they contribute. This allows the identification of those FSC Criteria and Indicators that do not appear to contribute explicitly to compliance with any specific GLPA requirement. In other words, these relate to issues that are addressed by requirements in the FSC Standard, with no overlapping requirement in the GLPA Standard.

This applies to the FSC Criteria and Generic Indicators laid out Table 3, below:

<table>
<thead>
<tr>
<th>FSC Criteria and Indicators</th>
<th>Description</th>
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</thead>
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<tr>
<td><strong>FSC Criterion 1.3</strong></td>
<td>Timely payment of prescribed charges</td>
</tr>
<tr>
<td>Indicator 1.3.2</td>
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</tr>
<tr>
<td><strong>FSC Criterion 1.5</strong></td>
<td>Records demonstrating legal compliance, including fulfilment of CITES requirements</td>
</tr>
<tr>
<td>Indicators 1.5.1, 1.5.2</td>
<td></td>
</tr>
<tr>
<td><strong>FSC Criterion 1.7</strong></td>
<td>Anti-corruption</td>
</tr>
<tr>
<td>Indicators 1.7.1, 1.7.2, 1.7.3</td>
<td></td>
</tr>
<tr>
<td><strong>FSC Criterion 1.8</strong></td>
<td>Long-term commitment to FSC Principles and Criteria</td>
</tr>
<tr>
<td>Indicators 1.8.1, 1.8.2</td>
<td></td>
</tr>
<tr>
<td><strong>FSC Criterion 2.1</strong></td>
<td>Conformity with ILO Core Labour Conventions</td>
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## FSC Criteria and Indicators

<table>
<thead>
<tr>
<th>FSC Criteria and Indicators</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indicators 2.1.1, 2.1.2, 2.1.3</td>
<td>Gender equality</td>
</tr>
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</table>
| **FSC Criterion 2.2**  
Indicators 2.2.1, 2.2.2, 2.2.3, 2.2.4 | Worker health and safety |
| **FSC Criterion 2.3**  
Indicators 2.3.1, 2.3.3, 2.3.4, 2.3.5 | Minimum wages |
| **FSC Criterion 2.4**  
Indicators 2.4.1, 2.4.2, 2.4.3, 2.4.4 | Job-specific training |
| **FSC Criterion 2.5**  
Indicators 2.5.2 | Community rights in relation to intellectual property |
| **FSC Criterion 4.8**  
Indicators 4.8.1, 4.8.2, 4.8.3 | Identification of ecosystem services and diversification of local economy |
| **FSC Criterion 5.1**  
Indicators 5.1.2 | Sustained yield |
| **FSC Criterion 5.2**  
Indicators 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 5.2.7 | Local processing and services |
| **FSC Criterion 5.4**  
Indicators 5.4.1, 5.4.2 | Strict limits on conversion |
| **FSC Criterion 6.10**  
Indicators: 6.10.1, 6.10.2 | Specific management plan requirements |
| **FSC Criterion 7.2**  
Elements of Indicator 7.2.2 | Revision of management objectives |
| **FSC Criterion 8.3**  
Indicator 8.3.3 | Records and tracking of forest products |
| **FSC Criterion 8.5**  
Indicators 8.5.1, 8.5.2, 8.5.3 | Explicit consideration of impacts of specific forest management activities |
| **FSC Principle 10**  
Criteria 10.1, 10.2, 10.3, 10.4, 10.5, 10.6, 10.7, 10.8, 10.11, 10.12 (*see discussion below) | Restoration of damage caused by forest management activities |
| **FSC Criterion 10.10**  
Indicator: 10.10.2 | |

In theory, these ‘non-referenced’ FSC requirements could be ignored in an FSC assessment of a Protected Area, without affecting the decision as to whether the Protected Area meets the GLPA Standard. In practice, at this stage of GLPA Standards development, it may be useful to review these areas of the FSC Standard to consider the implications for the GLPA system. At present these areas are addressed in the FSC system but not in the GLPA system – it is worth asking why, and considering whether the implications for both systems.

In some cases the areas concerned address aspects of management related specifically to trade in forest products (e.g. C1.5, C8.5), or to the specifics of sustained yield forest management (e.g. C5.2). GLPA may wish to consider whether, in cases in which a forest area within a Protected Area is being managed (at least in part) for production, it should specify the need for standards relating to this production and the related trade in products. If so, GLPA may consider whether these particular requirements are a useful point of reference.

Other issues are not specific to forest management, but are not currently addressed in the GLPA standard (or are addressed in a relatively minor way). GLPA may wish to review these to decide whether they add unnecessary cost and complexity to the GLPA system and are not necessary to
achieve GLPA's objectives, or whether they might be considered for inclusion in a future revision. Such issues include: provisions against bribery and corruption (C1.7); detailed and specific requirements relating to workers rights and worker health and safety (C2.1 – C2.5); the recognition and protection of the intellectual property rights of local communities in relation to traditional knowledge (C4.8); and specific actions in support of the local economy (C5.1, C5.4).

FSC’s prohibition on the certification of forest areas that have been recently converted from natural forest to plantation (C6.10) probably merits special consideration. GLPA might consider that if a previously converted area is now designated for protection, this is especially beneficial. It suggests that the primary objective of management of the area is no longer production, but the achievement of core conservation objectives. This possibility may merit consideration by FSC to consider.

The lack of highlighting and cross-referencing in relation to the Criteria and Generic Indicators of Principle 10 is for a different reason. FSC Principle 10 can be thought of as being a generic list of forest management practices that have the potential to result in negative environmental impacts, and which are therefore subject to restrictions. This is clearly linked to the GLPA requirements to identify and list ‘threats’, and devise restrictions to address those threats. However, compliance with the Criteria and Indicators of Principle 10 would not be expected to result in the inclusion of these aspects of management in an explicit list of threats — as the GLPA standard explicitly requires. These areas were not highlighted in the analysis, but it is recognized that this is a technicality that could be relatively easily addressed.

It should be noted that it is not the case that compliance with the GLPA Standard would ensure that all the other elements of the FSC Standard would be met. Highlighted areas indicate areas of overlapping action, but do not indicate cross-compliance. For example, FSC Criterion 6.9 prohibits conversion except in limited circumstances. This would be expected to contribute to a number of GLPA requirements (e.g. mitigating negative impacts associated with ‘conversion’ as a risk factor). However it does not follow that a GLPA certified Protected Area would necessarily limit conversion in compliance with the FSC requirements.

4. Conclusions

The specific objective of this study was to provide a technical comparison between the FSC and GLPA standards as a point of reference for subsequent discussion of options for alignment or possible collaboration. It is beyond the scope of this study to draw conclusions or make recommendations about the desirability of alignment or collaboration. However, it is possible to make some observations about the technical potential for alignment, and in relation to potential mechanisms for collaboration if this is considered desirable.

4.1 Technical Potential for Alignment

4.1.1 ‘Technical’ versus ‘General’ Equivalence

The analysis in Section 3 identifies areas of ‘technical equivalence’ as well as technical differences between FSC and GLPA standards. The analysis is based on an Indicator by Indicator comparison between the standards, focussing on the extent to which compliance with FSC requirements would be an automatic guarantee of compliance with GLPA requirements.

On this basis of strict technical equivalence it was concluded that approximately 20% of the current GLPA Indicators, and 15% of the GLPA Criteria should be met in all FSC-certified forests (if these forests were certified against the current draft International Generic Indicators). However these figures could be readily increased to compliance with 35% of the GLPA Indicators and 40% of the Criteria by adding relatively simple guidance or clarifications in relation to the application of the FSC Principles and Criteria for the certification of Protected Areas.

This area of technical overlap is already significant. However, it has been emphasised that this relates to strict technical equivalence. In a number of key areas technical equivalence may not be achieved, although it might be agreed that there is in fact a high level of convergence in terms of the overall achievement of shared objectives.

For example, some key areas in which there are technical differences include:
Differences in the treatment of socio-economic issues/impacts in relation to the establishment of the Protected Area as a Protected Area (i.e., in relation to land-use planning).

Differences in the general approach to the identification of key environmental objectives, i.e., the implications of the focus on the Protected Area’s specification of ‘nominated values’ (GLPA) as opposed to the listing of specific values in P6 and HCV (FSC).

The GLPA Standard’s focus on the identification and analysis of significant threats to nominated values as compared to FSC’s listing of specific threats:

The GLPA Standard’s focus on the specification of thresholds defining successful conservation outcomes in relation to nominated values compared to FSC’s generic requirements to avoid or minimize negative impacts.

These technical differences can be quite subtle, and yet be far-reaching. The GLPA standard is built on the identification and explicit listing of a set of ‘nominated values’. Subsequently, it requires threats, and actions in response to such threats, to be explicitly identified for each nominated value. It requires definitions of successful outcomes to be defined for each nominated value, and then technical measures and thresholds to be specified so that success can be measured and identified. The GLPA standard is relatively non-specific about the nature of the nominated values, the nature of potential threats, or the nature of actions that might be taken in mitigation. The FSC standard is built on the assumption that a forest is expected to have certain listed values, and that forest management activities might threaten those values. It then prescribes that these values are protected, and that their protection is monitored.

It is easy to see that the general objectives of both schemes are strongly aligned, even though the technical approaches differ. This suggests that there is a high level of ‘general equivalence’. However, in the context of a certification scheme, the formal recognition of ‘general equivalence’ can be challenging. The application of FSC’s concept of ‘High Conservation Values’ (HCV) provides a specific example. The definition and application of the HCV concept is an increasingly sophisticated technical exercise. There is significant political and intellectual capital invested in its application. There is likely to be a high level of overlap between the notion of ‘nominated values’ and ‘high conservation values’, but unlikely to be complete convergence. Achieving some level of mutual recognition between a scheme whose high level conservation objectives are based around the identification and protection of High Conservation Values, and one whose high level conservation objectives are based around the identification and protection of ‘nominated values’ is unlikely to be simple.

One key question in relation to these kinds of issues, is whether differences are only technical, representing two different ways to achieve essentially the same positive conservation outcomes, or whether they create significant potential for Protected Area managers to choose a standard that provides ‘green credentials’ whilst allowing them to avoid key responsibilities, or manage an area to a ‘lower’ standard than would be achieved if the other standard were applied. A somewhat different question is whether the differences result in significantly different, but equally ‘positive’ outcomes. An FSC-certified Protected Area might result in protection of a broad range of important forest values, whereas a GLPA-certified Protected Area might result in the protection of a specific, perhaps unique value, whilst allowing other values to be lost. For example, FSC might maintain its prohibition on forest conversion, whereas GLPA might permit conversion in order to ensure the protection of a ‘non-forest’ nominated value.

4.1.2 Areas of Non-Overlap

A somewhat similar set of issues is raised in relation to areas where the two standards simply do not overlap. For example, the FSC IGIs include measures related to the prevention of corruption, assurance of sustained yield, and the tracking and tracing of certified forest products. In some cases it is a grey line as to whether a difference is a question of non-overlapping requirements or a question of technical difference. Where issues are non-overlapping one standard requires an issue to be evaluated, the other does not. Discussion would then be required as to the significance of these
differences. No standard can cover every possible aspect of potential social/ environmental concern. There is some cost associated with every aspect of assessment. Decisions would be needed as to whether a particular aspect must always be assessed (and complied with) in order for there to be some form or recognition, or whether some level of difference is acceptable.

4.2 Potential Mechanisms for Alignment

Having identified a range of similarities and differences between the two standards, it is worth asking what options are available to increase the level of convergence, if this is considered desirable. A number of options were identified in Section 2.4.

In summary, both FSC and GLPA have mechanisms that allow for technical convergence, and that could operate together, or in parallel.

On the FSC side, FSC has the potential to establish a working group to consider the application of the FSC Principles and Criteria to Protected Areas. This would be supported by the 2008 FSC General Assembly Resolution 44, which has a broadly defined remit. A technical working group would be able to develop additional Criteria for application to Protected Areas, additional or modified Indicators, and/or provide guidance on the application of existing Criteria and Indicators. In addition, or as an alternative, an FSC national initiative could develop a set of nationally applicable Indicators and Means of Verification for application to Protected Areas (or specific kinds of Protected Areas) within its geographical scope. At either level, FSC could take account of GLPA draft standards, and/or potentially involve representatives of the GLPA process as stakeholders.

On the GLPA side, GLPA has the potential to establish a Jurisdictional Reference Group with a particular focus on the development of Indicators and Means of Verification for the application of the GLPA Standard in forested Protected Areas, and/or in relation to the management of ‘land-uses with trees’. IUCN could take account of FSC standards in this process, and/or potentially involve representatives of FSC.

Although it is not technically necessary, there would appear to be potential advantages if two such processes ran in parallel, allowing mutual alignment.

Neither of these mechanisms pre-judges the extent to which alignment might be achieved. The key risk would be that the involvement of different interests might make consensus within either process harder to reach. The potential benefit would be the possibility that alignment, where it can be achieved, could further the missions of both organisations.

4.3 Alignment, Collaboration, or Recognition

Finally, this paper has touched on some areas where some kind of formal recognition between GLPA and FSC standards, or between GLPA and FSC certificates might be of mutual benefit, for example in relation to areas beyond the boundaries of core GLPA- or FSC-certified areas, or in relation to sites that may be embedded within a larger area certified to one scheme or the other. It is likely that the potential for such collaboration or recognition would be enhanced if standards were to be aligned where possible, or even if areas and reasons for remaining non-alignment are mutually understood. Formal collaboration might create an enabling environment to achieve alignment. However, it should be emphasised that alignment does not itself imply or require formal collaboration or recognition between the two systems.
### Annex One: Terms of Reference for the Study

<table>
<thead>
<tr>
<th>Support appraisal of the feasibility and adaptability of current FSC Standards for application to protected areas</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Consider the FSC IGI draft 2.0(^3) as a potential point of reference for the Green List Standard.</td>
</tr>
<tr>
<td>b. Provide a critical analysis of the draft 2.0 standard vis a vis protected areas. What in the Standard would / would not be applicable, and why</td>
</tr>
<tr>
<td>c. Version 2.0 can be referenced here: <a href="http://igi.fsc.org/second-consultation.54.htm">http://igi.fsc.org/second-consultation.54.htm</a></td>
</tr>
<tr>
<td>d. Liaise directly with IUCN and FSC to provide both written and oral presentation of recommendations.</td>
</tr>
</tbody>
</table>

\(^3\) The original ToR referred to ‘Version 2.0’, but in FSC’s numbering system this is numbered V1-0 Draft 2-0.
Annex Two: Technical Background to the FSC and GLPA Standards

Standards for Comparison
This comparison is between

- FSC Principles and Criteria Version V5-0 (‘FSC P&C’) and the associated FSC International Generic Indicators V1-0 Draft 2-0 for public consultation (‘FSC Generic Indicators’), and
- Green List for Protected Areas Global Standard, Final, 2014-05-15 (‘GLPA Standard’) and the associated GLPA Generic Indicators and Means of Verification 15th May 2014 (‘GLPA Generic Indicators’).

2.1 FSC Standards

2.1.1 FSC Standard Status
This version of the FSC P&C was approved by the FSC Membership in February 2012, and can be considered definitive, although it cannot be applied in the field until the FSC Generic Indicators have been finalized and approved, and the transfer process for FSC National Standards is complete (ref: FSC website, July 16th 2014). Certificates issued to date have been issued against previous versions of the FSC Principles and Criteria and a range of associated Indicators developed by FSC regional, national or sub-national bodies or FSC-accredited certification bodies.

The current version of the FSC Generic Indicators was subject to a public consultation between January and March 2014, and a final version is due to be submitted to the FSC Board of Directors for approval in July 2014. The FSC Generic Indicators cannot be considered definitive at this point – they may be modified prior to finalization, and have not yet been implemented.

2.1.2 FSC Standard Structure
The FSC P&C consists of Principles and Criteria. A Principle is defined as ‘An essential rule or element; in FSC’s case, of forest stewardship’ (FSC P&C, Glossary of Terms). A Criterion (plural, Criteria) is defined as ‘A means of judging whether or not a Principle (of forest stewardship) has been fulfilled’ (FSC P&C, Glossary of Terms).

The FSC P&C is an international standard, but it cannot be implemented in the field without the development of associated ‘Indicators’. An Indicator is defined as ‘A quantitative or qualitative variable which can be measured or described, and which provides a means of judging whether a forest management unit complies with the requirements of an FSC Criterion. Indicators and the associated thresholds thereby define the requirements for responsible forest management at the level of the forest management unit and are the primary basis of forest evaluation.’

Indicators are developed and are applicable within a limited scope, which ‘may be a political designation (e.g. a country or a region (i.e. a number of countries), a province/state (i.e. a sub-national area), or a combination of political and ecological designations (e.g. a specified forest type or an ecologically-delimited area (eco-region) within a political designation)’ (Structure and Content of National Forest Stewardship Standards, FSC-STD-60-002 V1-0).

FSC refers to the combination of the FSC P&C and an associated set of Indicators as a ‘Forest Stewardship Standard’ (Structure and Content of National Forest Stewardship Standards, FSC-STD-60-002 V1-0).

In addition to the Indicators themselves an FSC Standard ‘should’ include, for every Indicator, examples of ‘Means of Verification’ (Structure and Content of National Forest Stewardship Standards, FSC-STD-60-002 V1-0). Use of the word ‘should’ in this context means that this is a recommendation rather than an obligatory requirement. A Means of Verification is defined as ‘A potential source of information that allows an auditor to evaluate compliance with an indicator. Means of verification are not normative and the certification body may justifiably use alternatives to those listed.’ (Structure and Content of National Forest Stewardship Standards, FSC-STD-60-002 V1-0).

2.1.3 FSC Standard Scope
The FSC P&C are intended to be globally applicable to all types and scales of forest including natural forests, plantations and other (i.e. non-forest) vegetation types. ‘The concept of ‘other vegetation
types' should be limited to those land-uses involving the growing of trees, but includes, in principle, ‘non-forest’ land uses as they contribute to the mission of FSC.’ (FSC P&C).

The mission of FSC is ‘to promote environmentally appropriate, socially beneficial, and economically viable management of the world’s forests’ (FSC P&C).

The FSC P&C says that ‘The decision on whether or not a certain vegetation type can be certified should be judged on a case by case basis. The decision should include consideration of the species involved and the production system in relation the ecosystem functions* and environmental values* required by the Principles and Criteria. To aid the decision, definitions of forest, natural forests and plantations are provided in the Glossary of Terms.’

The scope (i.e. the political or political-and-ecological area within which it is applicable) of a specific FSC Standard (i.e. the FSC P&C together with an associated set of Indicators) must be specified within the FSC Standard itself.

2.1.4 FSC Standard Variation at the Level of Indicators

The FSC P&C are identical wherever they are applied but, as noted, cannot be applied without the use of an associated set of Indicators that are specific to a defined political or political-and-ecological area.

Indicator sets may be prepared by an FSC-registered Standards Development Group following a process as well as structure and content requirements specified by FSC (ref: Process requirements for the development and maintenance of National Forest Stewardship Standards, FSC-STD-60-006 V1-2; Structure and Content of National Forest Stewardship Standards, FSC-STD-60-002 V1-0). Indicator sets that have been prepared in compliance with the applicable requirements may then be accredited by FSC and subsequently provide the basis for FSC certification within the specified scope.

Requirements for the content of such FSC Standards include that:

- They must use the FSC Generic Indicators as the ‘starting point’ for their development;
- They must specify Indicators for each element of every FSC Criterion;
- Each Indicator must specify one aspect of compliance rather than multiple aspects of compliance.
- Small/ low intensity managed forests may be made exempt from some Indicators which are applicable to other forests, and/or may be subject to alternative Indicators in relation to some Criteria
- Modified Indicators may be developed for application to specific forest types.

The standard must also comply with all approved FSC policies, standards, directives, guidelines and advice notes or other such documents that apply to the interpretation of the FSC P&C (Structure and Content of National Forest Stewardship Standards, FSC-STD-60-002 V1-0). The FSC P&C is supplemented by a set of 'Explanatory Notes' intended to clarify their meaning and desired outcomes and provide background information on context including references to applicable FSC and other documents, where needed. The Explanatory Notes are ‘not mandatory’. However ‘they are intended to be one of the bases for development of Forest Stewardship Standards including FSC international generic indicators, and reduce differences of interpretation of FSC requirements’ (FSC Principles and Criteria for Forest Stewardship, FSC-STD-01-001 V5-0).

The FSC P&C and the FSC Generic Indicators both recognize that the ‘ways of achieving compliance’ with the FSC Principles and Criteria may differ depending on the scale and intensity of management activities, and on the risk of negative impacts. Indicators are expected to provide guidance as to how differences of ‘scale, intensity and risk’ should be addressed within the specified scope.

In regions without an approved FSC Standard the FSC Generic Indicators will be directly applicable (FSC website, 16th July 2014). This represents a change from the previous system in which FSC-accredited certification bodies were permitted to develop their own sets of Indicators, subject to compliance with FSC requirements, in these circumstances.

2.1.5 Basis for FSC Certification

The FSC P&C says ‘There is no hierarchy between the FSC Principles or between Criteria. They share equal status, validity and authority, and apply jointly and severally at the level of an individual Management Unit’.

In other words no Criterion is more or less important than any other.
The FSC P&C also explains that:

‘FSC does not insist on perfection in satisfying the FSC Principles and Criteria. Unforeseen changes in cultural, ecological, economic and social environments may cause occasional failures in performance. As the Principles and Criteria are main components of a performance based standard, certification decisions are guided by the following:

- ‘The extent to which management activities satisfy each FSC Criterion.
- ‘The importance and/or consequences of failing to satisfy each FSC Criterion.’

This is interpreted in detail in FSC’s standard for forest management evaluations as meaning that a certificate can be issued when ‘there is no major failure in the conformity with the requirements of the applicable Forest Stewardship Standard in any FMU within the scope of the certificate’ (FSC-STD-20-007 V3-0).

Conformity is first assessed at the Indicator level, and any non-conformity with an Indicator is then evaluated to determine whether it constitutes a ‘minor’ or a ‘major’ non-conformity ‘at the level of the associated FSC Criterion’.

The detailed specifications for determining ‘minor’ and ‘major’ non-conformities are provided in Annex Six, but in summary a non-conformity is considered minor if: a) it is a temporary lapse, b) it is unusual/non-systematic, c) the impacts of the non-conformity are limited in their temporal and spatial scale, and d) it does not result in a fundamental failure to achieve the objective of the relevant FSC Criterion or another applicable certification requirement. A non-conformity is considered major if, either alone or in combination with further non-conformities, it results in or is likely to result in a fundamental failure to achieve the objectives of the relevant FSC Criterion or in a significant part of the applied management system. ‘Fundamental failure’ is indicated by non-conformity which: a) continues over a long period of time, or b) is repeated or systematic, or c) affects a wide area and/or causes significant damage, or d) is indicated by the absence or a total breakdown of a system, or e) is not corrected or adequately responded to by the client once identified.

2.2 GLPA Standards

2.2.1 GLPA Standard Status

The GLPA Standard was approved by the GLPA Steering Group (the formal governance body recognized by IUCN for development of the GLPA system) on May 15th 2014. It has been approved as the basis for the preparation of Jurisdictional Reference Group Indicator sets, and the preparation of applications for provisional Green Listing at the World Parks Congress in Sydney in November 2014. It is expected that the GLPA Standard will be subject to a further, formal public review process and subsequent revision before it can be considered definitive.

The GLPA Generic Indicators were developed by OneWorldStandards a consultancy organization contracted by IUCN on behalf of the GLPA Steering Group. They are designed to provide a reference for GLPA Jurisdictional Reference Groups (JRGs) as they develop their own jurisdictional level Indicator sets as the basis for provisional Green Listing at the World Parks Congress. They have not been subject to a formal review or approval process and are considered to be provisional at this point.

2.2.2 GLPA Standard Structure

The structure of the GLPA Standard is essentially the same as that of the FSC P&C, but divided into four Pillars rather than ten Principles. A Pillar is defined as ‘A high level organizing principle of the GLPA Standard’. Each Pillar consists of a set of Criteria* and their associated Indicators and Means of Verification. GLPA has adapted the FSC definition of a Criterion* as ‘A generic requirement related to a particular pillar of the GLPA Standard that any Protected Area must meet in order for it to be ‘Green Listed’. Conformity with a Criterion is determined through the assessment of compliance with its associated Indicators’.

Similarly, GLPA has adopted and modified the FSC definition of an Indicator as ‘A quantitative or qualitative variable which can be measured or described, and which provides a means of judging whether a Protected Area complies with the requirements of a Criterion. Indicators and the associated thresholds thereby define the requirements for successful Protected Area management at the jurisdictional level and are the primary basis of assessment for Green Listing’, and the FSC definition
of a Means of Verification as ‘A potential source of information that would allow an assessor to evaluate compliance with an indicator. Means of verification help to provide clarity to Protected Area managers and assessors but are not normative.’

GLPA’s Pillars and Criteria are intended to be applicable worldwide without modification. However, the current draft of the GLPA Standard includes a footnote that states that ‘The Criteria are intended to be globally applicable without the need for subsequent adaptation. However, if it is not possible to define a set of Global Criteria that cover all the necessary issues without the need for adaptation, then a process will be developed to allow some jurisdictional variation at the Criterion level (e.g. jurisdiction-specific additions and/or deletions) in exceptional circumstances and subject to an agreed approval process.’

The GLPA Criteria, like the FSC Criteria, are not designed for direct assessment in the field. Assessment in the field requires the development of a set of Indicators that must be met to demonstrate conformity with each Criterion within a particular ‘thematic’ or geographical jurisdiction (see below). As for FSC, the Indicators and their associated Means of Verification are intended to allow sufficient variation to ensure that they are appropriate for application within different ‘jurisdictions’.

2.2.3 GLPA Standard Scope

The GLPA Standard is ‘designed to be applicable to protected areas that meet the IUCN definition of a protected area, of any type or scale, and in any region of the world, consistent with the achievement of the standard’s objectives’ (IUCN Green List for Protected Areas (GLPA) Standard Development Procedure, FINAL DRAFT: 25th April 2014).

The GLPA Standard’s objective is ‘to identify protected areas that demonstrate equitable and effective planning, governance and management resulting in successful biodiversity conservation and social equity outcomes with associated benefits, showcasing protected areas’ contribution to the achievement of IUCN’s mission of ‘A just world that values and conserves nature’.’ (IUCN Green List for Protected Areas (GLPA) Standard Development Procedure, FINAL DRAFT: 25th April 2014).

The definition of scope for Indicator sets developed by GLPA Jurisdictional Reference Groups is slightly different to the scope for specific FSC Standards, in that GLPA allows for Jurisdictional Reference Groups to represent either geographic or thematic issues, with the potential that these may overlap. It is not yet clear how overlapping Indicator sets would be reconciled in practice.

2.2.4 GLPA Standard Variation at the Level of Indicators

As noted, the GLPA Standard needs to be adapted at the ‘jurisdictional’ level to reflect the diverse legal, social and bio-geographical conditions of PAs in different parts of the world through the development of jurisdiction-specific Indicator sets. The procedures for developing such Indicator sets are given in Annex 5 of the IUCN GLPA assurance procedure (DRAFT VERSION 0.9, 09 June 2014) which are adapted from FSC’s Structure and Content of National Forest Stewardship Standards, FSC-STD-60-002 V1-0.

In addition, each Criterion of the GLPA Standard is accompanied by Guidance Notes ‘that specify the issues that need to be addressed within the sets of Jurisdictional Indicators to ensure consistency, and which the IUCN will use as the basis for approving sets of Jurisdictional Indicators and Means of Verification that are submitted to it for endorsement’ (GLPA Standard, Final 2014-05-15).

The IUCN GLPA Standards Group is also committed to developing a set of ‘Generic Indicators’ (and associated Means of Verification) as a reference set that ‘can be readily adopted (with minor modification as necessary), for use within any jurisdiction that does not yet have a set of Indicators developed by a formal Jurisdictional Reference Group’ (GLPA Standard, Final 2014-05-15).

In conclusion, in principle the potential for variation at the level of GLPA Indicators is the same as the potential for variation at the level of FSC Indicators. However, at this point in time the GLPA Generic Indicators as well as the rules for developing GLPA Jurisdiction level Indicator sets are at an early stage of development. In comparison FSC’s rules for developing FSC Standards are settled and the FSC Generic Indicators are close to being finalized, having completed a process of extensive public consultation.

2.2.5 Basis for GLPA Certification
‘In order to be Green Listed, a Protected Area will be expected to meet all of the GLPA IUCN Standard Criteria, as demonstrated by assessment of compliance with the associated Indicators. However, the assessment process is expected to allow for temporary, minor, non-critical non-compliances at the level of Indicators, subject to agreement to take corrective action within an agreed timeframe’ (GLPA Standard, Final 2014-05-15).

‘Criteria (and/or their associated Indicators) would not be assessed at a particular site if they are not applicable at that site. A Criterion or Indicator is ‘not applicable’ if it relates to requirements that cannot in principle be assessed at the site. For example, requirements related to riparian protection would not be applicable in a marine Protected Area. It should be emphasised that consideration of applicability does not imply that managers may choose whether or not a particular Criterion will be applied at a site’ (GLPA Standard, Final 2014-05-15).

Detailed specifications as to what would constitute ‘temporary, minor, non-critical non-compliances at the level of Indicators’ are still to be developed.
ANNEX THREE: Standards Comparison Methodology

The focus of this study was firstly to consider the extent to which the FSC Generic Indicators could provide a point of reference for the GLPA standard. For this analysis the FSC Generic Indicators were reviewed to determine the extent to which compliance with FSC Generic Indicators could be used as a basis for determining compliance with GLPA requirements.

To carry out the analysis it was necessary to consider both FSC Generic Indicators and Criteria. Although this leads to quite a lot of apparent duplication this was considered necessary because the FSC Criteria provide the context for the assessment of the Indicators. In some cases it is necessary to take account of the FSC Criterion in order to understand the meaning of the associated FSC Generic Indicators.

Annex Four (submitted separately, but illustrated in the extract in Table 3. below) shows, for each GLPA Generic Indicator, the set of FSC Criteria and Generic Indicators that address the same, or similar requirements. The GLPA Indicator is shown in the left-hand column, and the related FSC Criteria and/or Indicators are shown in the right-hand column.

Typically, differences in wording or emphasis mean that there is no exact and direct relationship. It was very unusual for a specific FSC Indicator (or Indicators) to align exactly with a GLPA Indicator such that compliance with the FSC Indicator(s) would necessarily demonstrate compliance with the GLPA Indicator. Generally, a number of aspects of several different FSC Indicators, taken together, could be considered to meet or at least partially meet the requirements specified in a given GLPA Indicator.

To clarify the analysis, these areas of overlap were highlighted in yellow in the table. In order to reduce repetition and save space, where elements of an FSC Indicator were irrelevant they were deleted and replaced with three dots (‘…’). However, this was only done where the remaining text would be clear. In many cases the remaining text was left in to provide context.

Where an element of a GLPA Indicator did not seem to be adequately addressed by any FSC Indicator it was highlighted in blue. In some cases this identification was clear. However, in many cases the determination of whether a GLPA requirement was or was not adequately addressed is a matter of judgment, and/or subject to interpretation (of the GLPA requirement, of the FSC requirement, or of both). Nonetheless, a review of the elements of the GLPA Standard highlighted in blue should provide a quick indication of potential problem areas for alignment.

Having identified the main areas of overlap and the main problem areas in this way, each GLPA Indicator was annotated in red, in the left hand column. Firstly, where applicable, comments were made to highlight or clarify the basis for considering the standards to be out of alignment. Secondly, an attempt was made to answer the explicit question, whether compliance with the FSC Generic Indicators should be sufficient basis to determine, without further analysis, whether the requirements of the GLPA Standard are also being complied with. Thirdly, if the conclusion was that FSC compliance was not sufficient to demonstrate GLPA compliance, then notes were to made as to what additional specifications might be needed to achieve this.

Finally, as this methodology was implemented, a cross-reference was kept showing which of the FSC Criteria or Indicators contributed to compliance with which of the GLPA Indicators. Annex Five provides a listing of the FSC Criteria and Generic Indicators, cross-referenced to the GLPA Indicators to which they contribute. An extract is given in Table 4 below. FSC Criteria and Indicators whose fulfillment contributes to compliance with at least one GLPA Indicator are highlighted in yellow. FSC Criteria and Indicators that do not appear to contribute to compliance with any specific GLPA requirement remain without highlighting or cross-referencing.

<table>
<thead>
<tr>
<th>GLPA Generic Indicators (draft)</th>
<th>FSC Criteria &amp; Generic Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GLPA Pillar 1: Sound Planning</strong></td>
<td></td>
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</tbody>
</table>
| Green Listed Protected Areas have clear, long-term conservation goals, based on a sound understanding of their natural and social context | }
GLPA Criterion 1.3: Understanding the threats and challenges to core values

Threats/ challenges which could damage the nominated values, or which are incompatible with the Protected Area’s IUCN management category have been identified and analysed in sufficient detail to support effective planning and management.

Guidance Notes

The identification of threats should include all significant threats to the Protected Area’s core environmental objectives, and activities that are incompatible with its protected status.

Threats will be specific to each jurisdiction, Protected Area type and Protected Area setting and context. However, based on work to date on Protected Area Monitoring and Evaluation (PAME): significant threats to land-based Protected Areas may include (but are not limited to):

- Hunting, killing and collecting animals
- Logging and wood collection
- Unregulated NTFP collection
- Recreational impacts
- Adjacent land use
- Encroachment
- Settlements inside PAs
- Fire and inappropriate fire management
- Pollution
- Invasive alien species
- Mining
- Climate Change and its associated impacts

It should be emphasised that this requirement does not exclude the continuation of activities that are compatible with the Protected Area’s IUCN categorisation, and with its core objectives. Such activities may include hunting, collecting, recreational uses or other activities at sustainable levels.

References


1.3.1 There is a listing of all the significant threats to the long-term conservation of each of the area’s nominated values.

Commentary: FSC requirements are

6.1.2 Assessments are conducted at appropriate scales* so that:

1. Impacts of management activities are assessed (Criterion* 6.2);
2. Risks* to environmental values* are

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## GLPA Generic Indicators (draft)

not built around an explicit *listing*, though there are several areas where threats would in practice be likely to be identified, and many areas where they are ‘pre-identified’ within the FSC P&C themselves. Nor are FSC requirements built around threats to *the nominated values*. However, similarly, many likely threats to the nominated values would be expected to be identified.

**Should FSC Certification of a PA be sufficient to ensure that this GLPA requirement has been met?** Partially. Most threats within the PA would be likely to be identified. Some outside the PA may not be. FSC doesn’t require an explicit ‘listing’ of threats, and doesn’t require a listing around the construct of ‘nominated values’.

**Additional requirements:** guidance as to the identification and presentation of threats in a list, in the case of PA certification may be sufficient, assuming there is the prior addition of guidance/requirements related to the definition and identification of ‘nominated values’.

<table>
<thead>
<tr>
<th>GLPA Generic Indicators (draft)</th>
<th>FSC Criteria &amp; Generic Indicators</th>
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<tr>
<td>not built around an explicit <em>listing</em>, though there are several areas where threats would in practice be likely to be identified, and many areas where they are ‘pre-identified’ within the FSC P&amp;C themselves. Nor are FSC requirements built around threats to <em>the nominated values</em>. However, similarly, many likely threats to the nominated values would be expected to be identified.</td>
<td>6.2 (revised 6.1) Prior to the start of site-disturbing activities, The Organization* shall* identify and assess the scale, intensity and risk* of potential impacts of management activities on the identified environmental values*; (C6.1 V4)</td>
</tr>
<tr>
<td><strong>Should FSC Certification of a PA be sufficient to ensure that this GLPA requirement has been met?</strong> Partially. Most threats within the PA would be likely to be identified. Some outside the PA may not be. FSC doesn’t require an explicit ‘listing’ of threats, and doesn’t require a listing around the construct of ‘nominated values’.</td>
<td>6.2.1 Potential impacts of all management activities on <em>identified</em> environmental values* within and outside the Management Unit*, are identified and assessed during management planning and prior to site-disturbing activities.</td>
</tr>
<tr>
<td><strong>Additional requirements:</strong> guidance as to the identification and presentation of threats in a list, in the case of PA certification may be sufficient, assuming there is the prior addition of guidance/requirements related to the definition and identification of ‘nominated values’.</td>
<td>6.2.2 The assessment of potential impacts is at a level of detail and at a scale* that is sufficient to identify and describe:</td>
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<tr>
<td></td>
<td>1. Necessary impact prevention and mitigation measures;</td>
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<td></td>
<td>2. Monitoring to detect and mitigate possible negative impacts can be identified; and</td>
</tr>
<tr>
<td></td>
<td>3. Both site-specific and larger-scale impacts can be identified and addressed.</td>
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<tr>
<td></td>
<td>6.2.3 The potential cumulative impacts of multiple management activities on <em>identified</em> environmental values* are identified and assessed.</td>
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<td></td>
<td>6.4.2 Potential impacts of management activities on rare and threatened species* and their habitats* are identified;</td>
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<td></td>
<td>6.5 Up-to-date information is maintained about hunting, fishing, trapping or collecting activities, including authorized or permitted harvest levels;</td>
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<td></td>
<td>7.2.2 The management plan* is implemented and addresses the following elements:</td>
</tr>
<tr>
<td></td>
<td>[1. A summary of the results of assessments, including:</td>
</tr>
<tr>
<td></td>
<td>a) Natural resources and environmental values*, as identified in Principle* 6 and Principle* 9;</td>
</tr>
<tr>
<td></td>
<td>b) Social, economic and cultural resources and condition, as identified in Principle 6, Principle* 2 to Principle* 5 and Principle* 9; and]</td>
</tr>
<tr>
<td></td>
<td>c) Major social and environmental risks in the area, as identified in Principle 6, Principle* 2 to Principle* 5 and Principle* 9.</td>
</tr>
<tr>
<td></td>
<td>9.2.1 Threats to identified High Conservation Values* are documented using Best Available</td>
</tr>
</tbody>
</table>
10.9 The Organization shall assess risks and implement activities that reduce potential negative impacts from natural hazards proportionate to scale, intensity, and risk. (New)

10.9.1 The risk of management activities to increase natural hazards is assessed.

10.9.2 Management activities are modified and/or measures are developed and implemented that reduce the identified risks.

See also specification of explicit risks, as per Principle 10: regeneration techniques, species choice, alien species (use, control), GMOs, silviculture, fertilizers, pesticides, biological control agents, infrastructure, transport, harvesting/extraction of NTFPs, waste materials.

Table 3. Extract from Annex Four (submitted separately), illustrating cross-reference between GLPA Indicators and relevant FSC Indicators

<table>
<thead>
<tr>
<th>GLPA Generic Indicators (draft)</th>
<th>FSC Criteria &amp; Generic Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information.</td>
<td></td>
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<tr>
<td>9.2.1 Threats to identified High Conservation Values are documented using Best Available Information.</td>
<td>FSC ref: 1.3.1, 3.1.1, 3.1.2, 3.2.1, 3.2.2, 3.3.2, 3.4.1</td>
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</tbody>
</table>

Table 4. Extract from Annex Five (submitted separately) illustrating the summary of cross-references between the FSC Criteria and GLPA Indicators
ANNEX FOUR: Cross-Reference between GLPA Indicators and Relevant FSC Indicators

(Submitted Separately)

ANNEX FIVE: Summary of Cross-References between the FSC Criteria and GLPA Indicators

(Submitted Separately)
Annex Six. Extract from Forest management evaluations, FSC-STD-20-007 V3-0.

8. Basic principles

8.1 In addition to the conditions necessary for a client to receive or maintain a certificate as specified in FSC-STD-20-001, certification bodies shall make certification decisions based on their evaluation of the forest management enterprise's conformity with the requirements specified in the applicable Forest Stewardship Standard and related normative documents (e.g. FSC-STD-30-005 FSC Standard for Group Entities in Forest Management Groups).

8.2 All non-conformities that are identified by the certification body during an evaluation shall systematically be recorded in the evaluation report or associated checklists.

NOTE: non-conformities with requirements shall be recorded and addressed even if these are not in the specific focus of a particular evaluation.

8.3 Each non-conformity against indicators of the applicable Forest Stewardship Standard shall be evaluated to determine whether it constitutes a minor or major non-conformity at the level of the associated FSC Criterion.

Note: A single Corrective Action Request shall not include requirements that relate to two (2) or more Criteria from the applied Forest Stewardship Standard.

8.4 Each non-conformity against other applicable requirements (e.g. FSC-STD-30-005 FSC Standard for Group Entities in Forest Management Groups) shall be evaluated to determine whether it constitutes a minor or major non-conformity at the level of the individual requirement.

8.5 Non-conformities shall lead to Corrective Action Requests, suspension or withdrawal of the certificate.

8.6 A non-conformity shall be considered minor if: a) it is a temporary lapse, or b) it is unusual/ non-systematic, or c) the impacts of the non-conformity are limited in their temporal and spatial scale, and d) it does not result in a fundamental failure to achieve the objective of the relevant FSC Criterion or another applicable certification requirement.

8.7 A non-conformity shall be considered major if, either alone or in combination with further non-conformities, it results in, or is likely to result in a fundamental failure: a) to achieve the objectives of the relevant FSC Criterion, or b) in a significant part of the applied management system.

NOTE: The cumulative impact of a number of minor non-conformities may represent a fundamental failure or a total breakdown of a system and thus constitute a major non-conformity.

8.8 Fundamental failure is indicated by non-conformity which: a) continues over a long period of time, or b) is repeated or systematic, or c) affects a wide area and/or causes significant damage, or d) is indicated by the absence or a total breakdown of a system, or e) is not corrected or adequately responded to by the client once identified.

8.9 The certification body shall consider the impact of a non-conformity, taking account of the fragility and uniqueness of the forest resource, when evaluating whether a non-conformity results in or is likely to result in fundamental failure to achieve the objective of the relevant FSC Criterion.

8.10 Requests for corrective action shall have the following timeframes:

8.10.1 Minor non-conformities shall be fully corrected within one (1) year NOTE: Minor non-conformities may be extended once for a maximum period of another year
GLOSSARY

Criterion (FSC)
A means of judging whether or not a Principle (of forest stewardship) has been fulfilled
(FSC Principles and Criteria for Forest Stewardship, FSC-STD-01-001 V5-0)

Criterion (GLPA)
A generic requirement related to a particular pillar of the GLPA Standard that any Protected Area must meet in order for it to be ‘Green Listed’. Conformity with a Criterion is determined through the assessment of compliance with its associated Indicators.
(GLPA Standard, Final 2014-05-15)

Indicator (FSC)
A quantitative or qualitative variable which can be measured or described, and which provides a means of judging whether a forest management unit complies with the requirements of an FSC Criterion. Indicators and the associated thresholds thereby define the requirements for responsible forest management at the level of the forest management unit and are the primary basis of forest evaluation.
(Structure and Content of National Forest Stewardship Standards, FSC-STD-60-002 V1-0)

Indicator (GLPA)
A quantitative or qualitative variable which can be measured or described, and which provides a means of judging whether a Protected Area complies with the requirements of a Criterion. Indicators and the associated thresholds thereby define the requirements for successful Protected Area management at the jurisdictional level and are the primary basis of assessment for Green Listing.
(GLPA Standard, Final 2014-05-15, adapted from FSC STD 60-002 Structure and Content of National Forest Stewardship Standards, V1-0)

Means of verification (FSC)
A potential source of information that allows an auditor to evaluate compliance with an indicator. Means of verification are not normative and the certification body may justifiably use alternatives to those listed.
(Structure and Content of National Forest Stewardship Standards, FSC-STD-60-002 V1-0)

Means of Verification (GLPA)
A potential source of information that would allow an assessor to evaluate compliance with an indicator. Means of verification help to provide clarity to Protected Area managers and assessors but are not normative.
(GLPA Standard, Final 2014-05-15, adapted from FSC STD 60-002 Structure and Content of National Forest Stewardship Standards, V1-0)

Pillar (GLPA)
A high level organizing principle of the GLPA Standard. Each Pillar consists of a set of Criteria and their associated Indicators and means of verification.
(GLPA Standard, Final 2014-05-15)

Principle (FSC)
An essential rule or element; in FSC’s case, of forest stewardship’
(FSC Principles and Criteria for Forest Stewardship, FSC-STD-01-001 V5-0)

Protected Area (FSC)
Not defined. But the FSC definition of ‘Conservation zones and protection areas’ notes that ‘the term ‘protected area’ is not used for these areas, because this term implies legal or official status, covered
by national regulations in many countries. In the context of the Principles and Criteria, management of these areas should involve active conservation, not passive protection’.

(FSC Principles and Criteria for Forest Stewardship, FSC-STD-01-001 V5-0)

Protected Area (GLPA)

A clearly defined geographical space, recognised, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values.

The definition is expanded by six management categories (one with a sub-division), summarized below.

Ia  Strict nature reserve: Strictly protected for biodiversity and also possibly geological/geomorphological features, where human visitation, use and impacts are controlled and limited to ensure protection of the conservation values

Ib  Wilderness area: Usually large unmodified or slightly modified areas, retaining their natural character and influence, without permanent or significant human habitation, protected and managed to preserve their natural condition

II  National park: Large natural or near-natural areas protecting large-scale ecological processes with characteristic species and ecosystems, which also have environmentally and culturally compatible spiritual, scientific, educational, recreational and visitor opportunities

III  Natural monument or feature: Areas set aside to protect a specific natural monument, which can be a landform, sea mount, marine cavern, geological feature such as a cave, or a living feature such as an ancient grove

IV  Habitat/species management area: Areas to protect particular species or habitats, where management reflects this priority. Many will need regular, active interventions to meet the needs of particular species or habitats, but this is not a requirement of the category

V  Protected landscape or seascape: Where the interaction of people and nature over time has produced a distinct character with significant ecological, biological, cultural and scenic value: and where safeguarding the integrity of this interaction is vital to protecting and sustaining the area and its associated nature conservation and other values

VI  Protected areas with sustainable use of natural resources: Areas which conserve ecosystems, together with associated cultural values and traditional natural resource management systems. Generally large, mainly in a natural condition, with a proportion under sustainable natural resource management and where low-level non-industrial natural resource use compatible with nature conservation is seen as one of the main aims


Management Unit (FSC)

A spatial area or areas submitted for FSC certification with clearly defined boundaries managed to a set of explicit long term management objectives which are expressed in a management plan. This area or areas include(s):

- all facilities and area(s) within or adjacent to this spatial area or areas under legal title or management control of, or operated by or on behalf of the organization, for the purpose of contributing to the management objectives; and
- all facilities and area(s) outside, and not adjacent to this spatial area or areas and operated by or on behalf of The Organization, solely for the purpose of contributing to the management objectives.

(FSC Principles and Criteria for Forest Stewardship, FSC-STD-01-001 V5-0)