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### Committee on Forests and the Forest Industry

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Item 3 of the provisional agenda

**Comments on the Action Plan for the Forest Sector in a Green Economy**

## **Comments on the Action Plan for the Forest Sector in a Green Economy**

### **I. Introduction**

During its 70th session the Timber Committee decided to open a last round of consultation on the Action Plan for the Forest Sector in a Green Economy. Over a three month period comments and amendments were collected from member States and other Stakeholders and compiled in this document.

The responses of the secretariat to these comments are marked in *italic*, and the Action plan has been modified accordingly (see document ECE/TIM/S/2013/3).

### **II. Comments by Member States**

#### **1. Austria**

##### **(a) General Comments**

First of all, we agree that Green Economy is an important topic on the international, regional and national agenda. The forest sector should use this headline to present its substantial contribution to Green Economy and Sustainable Development and to sharpen its profile. The submitted draft Action Plan for the Forest Sector in Green Economy is a good and welcome basis for discussion. However, the current draft raises concern and some fundamental questions, especially on style and coverage.

Austria questions the accuracy of the title. “Action Plan” would require real actions and actors. But due to a missing mandate the draft contents only “possible actions” and “possible actors”. Therefore, Austria suggests to reshape the Action Plan in such a way that

1. The current work-sharing within the forest sector in the region is described and analysed in respect of the contribution to Green Economy.
2. The future contribution of the UNECE/FAO integrated programme of work on timber and forestry to Green Economy is described. (This part can be done as soon as the joint programme of work is fixed. Otherwise we run the risk of listing wishes without adequate resources for implementation.)
3. Recommendations for action to improve the forest sectors contributions to Green Economy are addressed to member Governments and interested organizations. (Such recommendations should not be unrealistic and bear in mind necessary resources.)

Such an approach would correspond quite well to the terms of reference of the UNECE Timber Committee.

An actual action plan with real actions including monitoring of its implementation could only comprise actions within the programme of work unless a mandate from a relevant organization to include its area of responsibility.

The above comments are recommendations for a general restructuring of the document, detailed comments on the elements contained in the draft are only meaningful after structure and context of the draft are clear.

*The scope, nature and title of the Action Plan will be addressed by the special session and the decisions reflected in the document to be submitted to Metsä2013.*

*With regard to the questions raised by Austria about the implementation of the Action Plan, and coordination of the activities:*

- *ECE/FAO is consulting with other “possible actors” and hopes to present a more comprehensive picture at Metsä 2013 in December. At that time, the ECE/FAO programme will also be available.*
- *The joint ECE/FAO work programme will be considered together with the Action Plan at the special session so that they are coordinated.*
- *The joint session at Metsä 2013 will be in a position to invite possible actors to contribute to the implementation of the Action Plan. In fact, many of the “possible actors” have participated actively in the process from the beginning, so their general support of the proposals is already known, although they have made no formal commitment.*

## **2. Canada**

### **(a) General Comments**

Canada has been an active participant in discussions on this document from inception, and we are comfortable with the overall direction taken.

As reflected by our comments embedded in the text, we would suggest increasing reference to FAO-related international sustainable forest management criteria and indicator processes and initiatives, and proposing synergistic approaches by the Montréal Process and Forest Europe whenever appropriate.

Also reflected by our comments is the need to increase reference to Canada and the United States in the Action Plan (as well as to the Montréal Process). Currently, a number of objectives appear to focus solely on Europe whereas the text could be broadened to include the other UNECE Member States.

Finally, we note Norway's suggestion to reframe the title and scope of the Action Plan to best fit the mandate of the organisations involved, and would also be comfortable with this alternative approach.

*The Action Plan has been checked and modified from beginning to end to ensure that it is not “euro-centric” and fully addresses North America, and includes, where appropriate the Montréal Process alongside Forest Europe.*

*As regards the title and status of the Action Plan, this will be discussed in depth at the special session.*

#### (b) Specific Comments

Action A 1.4; on “certification system”: Certifications systems are market led entities and so they compete against each other in the marketplace. Governments do not/should not, have a role in “unifying” these market entities. Market competition between the systems is a strong force for continual improvement.

*Concern has been expressed in many quarters about the extra cost and reduced impact of the certification message which arise from the competition between certification systems. However, this action is not intended to refer to unifying certification systems (although some actors do consider that desirable) but to developing national framework systems and standards which satisfy the requirements of several certification systems, enabling forest owners who manage according to the national standard to be certified under either major certification system, without changing their management methods. This is the approach adopted for instance in the UK, and addresses part of the common complaint about harmful tension and unnecessary friction between the systems, without compromising the necessary requirement that they be “market led”, or forcing systems which want to be separate to merge. Wording clarified to remove ambiguity.*

Action A 3.1; on “instruments”: This objective’s wording excludes Canada and the US.

*The suggestion has been incorporated in the latest version.*

Action A 5.2; on “aspects”: The methodology that is Life Cycle Assessment (LCA) is not the right tool to look at social and biodiversity impacts. The results of social LCA and LCA of biodiversity are typically highly unreliable. In order to get meaningful results when it comes to calculating social and biodiversity impacts of wood products, it is advisable to use more “classic” research methods but apply them to the whole life cycle of the product.

*The question of giving adequate coverage to biodiversity and social aspects is clearly very challenging, and some experts think LCA is an appropriate tool, whereas others disagree. The wording has been changed to be more inclusive, while retaining a mention of LCA (the whole section is about LCA).*

Action A.5.4 (track changes mode): specify declarations and apply standardized methodologies.

*The suggestion has been incorporated in the latest version.*

Action B 1.3; on “legislation”: Wording of this objective excludes Canada and the US.

*The wording has been changed so that the remark applies only to EU members, for whom this aspect is important.*

Action B 1.5; on “non-renewability”: This term is not precise enough. What does “non-renewability refer to? Environmental degradation (including climate change), loss of biodiversity, etc?

*The term “negative externalities” is added to the new version. This is more inclusive and precise. The aim was not to limit the definition.*

Action E 1.1; on “measuring particular indicators”: Montréal Process has done a lot of work around this issue. Suggest this objective include synergies with Montréal Process so as not to reinvent the wheel when it’s appropriate.

*This action covers areas where the ECE/FAO secretariat has a continuing operational role. This includes the Collaborative Forest Resource Questionnaire (CFRQ), in which the Montréal Process is very active, as well as North American Forest Sector Outlook Study (NAFSOS), which covers North America. The wording has been modified accordingly. Improved cooperation between Forest Europe and the Montréal Process, as well as others, is specifically covered in E.2.2.*

### 3. Finland

#### (a) General Comments

Finland sees the Action Plan as an important step forward in communication the role of forest sector in green economy as well as in facilitating the sector's transformation into more green bio-based economy. We appreciate very much if the concept of green bio-based economy could be incorporated in the Action Plan document.

*The term “bio-based” has been incorporated into Part B of the document.*

We appreciate very much the transparent and substantive preparation of the draft Action Plan. We believe that participation and role of stakeholders, in particular the private sector, is key in transformation. Therefore we suggest that in each individual activity, the role of private sector is duly considered. The draft Action Plan has been circulated among the Finnish stakeholders and we hope that comments sent by these entities are duly considered when finalizing the Action Plan.

*The role of the private sector has been made explicit in several parts of the document.*

We believe that at the Rio+20 Conference, the global understanding on green economy advanced significantly. The report "The Future We Want" includes a number of useful elements that could be reflected the Action Plan. For example the UNFF10 background document (E/CN.18/2013/6) includes a good summary of forest related elements that could be reflected in the Action Plan. In our understanding the ECE/FAO has a clear mandate to develop this type of Action Plan and to enhance forest sectors contribution.

*Annex II contains a summary of the main relevant points of “The future we want”, so the special session may see in what way the Action Plan contributes to implementing the ideas of Rio + 20.*

We are pleased that the draft Action Plan captures the whole value chain and the all dimensions of sustainable development.

We thank for the conceptual framework of the draft Action Plan. However, we suggest the secretariat to consider if the vision (section D, para 12) could be streamlined and shortened. It seems that the vision text is quite lengthy and therefore losing the focus. Our preference if for shorter and "punchier" vision.

*The agreed version is indeed getting rather “overweight”, and a shorter version is proposed below. However, it should be recognised that brevity is achieved at the expense of specificity, and that several comments added text to the proposed vision, rather than*

*shortening it. A third alternative would be a radically shorter vision, merely saying that the forest sector should contribute to the development of the green economy as described in the Rio + 20 outcome “The Future We Want”, leaving more specific statements to other parts of the preamble, notably the “principles”.*

**Proposed shorter version:**

*The Action Plan is based on the following vision of the forest sector in a green economy:*

- *The forest sector makes a maximum contribution to human well-being, while halting the loss of forest biodiversity and maintaining and developing ecosystem services on a sustainable basis, all within the context of a changing climate.*
- *The forest sector protects the welfare of all stakeholders, uses all resources wisely and economically, and contributes to the mitigation of, and adaptation to, climate change*
- *Forest sector governance systems take into full account all of the ecosystem services provided by the forest, compensating suppliers for providing them whenever feasible. Progress is monitored in a transparent way, and policies adjusted to reach the agreed goals. The forest sector learns from other parts of the emerging green economy and shares its own experience with them.*

We are very pleased on five areas of activity; (i) sustainable production and consumption (incl. resource efficiency), (ii) a low carbon economy, (iii) decent green jobs, (iv) valuation and PES for ecosystem services, and (v) monitoring and governance. These need to have a clear link to vision, goal and principles. As the Action Plan is for communication purposes, we strongly suggest the secretariat to prepare and include in the document a graphic illustration of these different layers and elements of the Action Plan. We intend to send some ideas through other means for your consideration.

*A graphic illustration, based on the Finnish proposals has been included.*

We believe that ecosystem services is a broad concept including also wood, timber and fibre. We hope that the Action Plan reflects this.

*In the Millennium Ecosystem Assessment, four types of ecosystem services are identified: supporting, provisioning, regulating and cultural. Wood supply is certainly a “provisioning service” of forests, although in most contexts, including discussion of “payment for ecosystem services”, “forest ecosystem services” are not considered to include wood supply, for which “payment” is not an issue, conceptually at least. The Plan will be checked for accuracy and precision in this respect.*

We believe that gender aspect is somehow missing in the draft Action Plan. Hopefully it could be more visible substantive.

*It is true that gender aspects do not appear in the Plan, as nothing on gender was proposed by any stakeholder. Realistic proposals would be welcome. In the meantime, “including gender aspects” has been included under C.1.1 and C.1.2, so that the point is not lost, and a new action is proposed (E.0.5), starting from a review of the success of the recommendations made by earlier work under ECE/FAO, (see ‘Time for action: changing the gender situation in forestry’ by the ECE/FAO team of specialists on women in forestry, 2006, available from <http://www.fao.org/forestry/10952-0dc39dc097e544f4dbe8167fb9b62ea99.pdf>) leaving open the possibility to undertake new activities on gender aspects, if considered appropriate.*

The pillar C. "decent green jobs in forest sector" may benefit if the focus would be broader. Somehow the proposed actions seemed to be repetitive. It seems to be focusing quite a lot on traditional forest work while more innovative approach to working opportunities may

also exist. Need to emphasize continuous training, human resources development and use of modern technology in broad terms.

*The most acute problems of occupational safety and health, and under-skilled work force seem to be in traditional forest work. Training etc. are implied as means to address the objectives stated. The focus might be broadened, but specific proposals should be tabled.*

We believe that the implementation is key for success. In this respect we support the draft Action Plan that provides a road-map for implementation. And that actions taken and achievements are followed up and/or monitored. In this respect we support that ECE/FAO will consider the Action Plan in the context of Joint Programme of Work.

*See overview about monitoring and implementation. The question of implementation and monitoring will be addressed by the special session.*

The Action plan should be seen not only as a product of ECE/FAO but as public ownership of the whole sector. Therefore, we encourage the secretariat to approach other entities and actors and to facilitate and encourage their engagement into implementation as soon as possible. For example, various entities and actors could launch their contributions in this regards at the METSÄ2013 meeting in December. We believe that different types of public-private partnerships area feasible and effective way forward in moving towards more green bio-based economy in the forest sector.

*The secretariat will explore different approaches to involve actors in the implementation of the Action Plan before and after 'Metsä2013' and provide information on developments.*

Finally, we thank the secretariat for your contributions. We are committed to work with the UN bodies, other entities, countries and stakeholders in order to conclude preparations for the Action Plan and to move forward in implementation.

## 4. Norway

### (a) General Comments

The forest sector has the potential to play an important role in a future green economy. The development of forest policies to facilitate and to ensure that forests can provide for a variety of human needs will probably be one of the key success criteria for a transition to a more sustainable economy. Countries must make their own priorities regarding the role forest should play in their economies, but given the diversity of products and services provided by forests, and the renewable nature of the forest production, it will be important that decision makers have access to relevant information regarding the forest sectors potential.

On this background, we do appreciate the work carried out under the UNECE Timber Committee and the FAO European Forestry Commission in communicating the potential of the forest sector to be a part of a more sustainable economy, and how the sector can lead the way towards an emerging green economy. This kind of work does, in our view, fit very well into the mandates of the organizations, providing an arena for exchange of experiences and information among forest professionals in the UNECE-region and producing high quality information and analysis for policy making related to the forest sector.

The draft plan of November 2012 identifies a set of possible actions that could be carried out to enhance the role of the forest sector. This is a comprehensive list, and the actions vary from research, provision of information and analyses to direct actions under government authority. As a case study, or feasibility study, this could, together with description of expected/desired output from the actions, provide valuable background for policy making, both through regional bodies such as Forest Europe for global policy cooperation, and of course for national policy making throughout the UNECE-region.

We see a lot of merit in the work already carried out, but we also see a need for making substantial changes regarding the status of the document. We do not support the idea of turning this list of identified possible actions into an action plan for the forest sector in the UNECE-region.

The draft states that the proposed action plan is not binding. However, we think the whole concept of making a plan is that it should be carried out in order to achieve certain goals. This makes the proposed plan problematic in more than one way. Firstly the UNECE and FAO have, of course, no mandate to define goals and make plans on behalf of the whole UNECE forest sector. Secondly, the plan will be parallel to the existing work program for the UNECE/FAO, making priorities between the two unclear.

The proposed plan is based upon a vision and strategies for the forest sector in the UNECE-region. These are highly political issues, which are to be handled on other arenas than those provided by the UNECE and FAO. Forest policy cooperation in the pan-European region has for more than twenty years taken place within the framework of Forest Europe. We would in this context recall that the countries in Europe agreed on a shared vision and related goals and targets for forests in Europe at the Forest Europe Ministerial Conference held in June 2011.

In section G. of the proposed action plan, implementation is discussed. According to this discussion, implementation should be monitored, and a mechanism for facilitating monitoring of the implementation of the plan could be suggested. It is difficult to see the benefits of monitoring implementation of something that are mere examples on what could be done. This kind of plan and implementation monitoring of the plan could also constrain the necessary political discussions that are to be taken in the years to come. Instead of making plans for the whole sector, UNECE and FAO should continue to support decision makers on all levels by providing good support for their priorities.

We propose that the present draft Action Plan for the Forest Sector in Green Economy of November 2012 is revised and turned into a document presenting possible actions for the forest sector. To our knowledge, the joint Timber Committee and European Forestry Commission have no mandate to adopt a vision and strategy for the whole UNECE forest sector. We will also propose that the name of the draft is changed to:

“Possible actions for enhancing the UNECE forest sector contribution to a green economy.”

With these changes, the paper will not need any monitoring of implementation, except for ordinary surveys on how the UNECE and FAO papers and information are utilised for enhancing the forest sector in the UNECE region. This will also help to avoid parallel work plans for Timber Committee and European Forestry Commission. The joint meeting in December 2013 will then solely adopt a joint work program for the period 2014-2017. Relevant actions from the draft action plan for the green economy could be part of the work program, subject to the ordinary prioritization that has to take place within the limits of the financial and human capacity of the two bodies.

*The status and title of the Action Plan, as well as of monitoring and implementation will be discussed in depth at the special session, alongside the draft of the joint ECE/FAO programme of work which should reduce the ambiguity about the relation between the Action Plan and the work programme.*

## 5. Slovakia

### (a) General Comments

Principally, we welcome the development of the action plan as it reflects to the topical issue of contribution that forests and forest sector can provide to the concept of green economy at all levels. In this context, we also appreciate work that has been done by the UNECE

Timber Committee and FAO European Forestry Commission at this field so far. We believe that the agenda of “forests and green economy” should be prioritized in the next FAO/UNECE joint programme for 2014-2017.

However, as regards the proposed concept of the action plan, we would like to share some principal concerns. In our understanding, an action plan (in general terms) is a document which identifies actions/measures that should contribute to achieving stated (policy) overall vision and objectives/goals. This vision and objectives/goals are usually set up by policies, strategies or other policy instruments (resolutions, decisions taken by high-level political bodies), i.e. not by action plan. In some specific cases, an action plan can reaffirm vision and objectives, but these should be entirely built on a “parent” strategy (e. g. former EU Forest Action Plan).

From these reasons, we do recommend that the action plan should contribute to achieving already existing policy objectives relevant to the policy field of forests and green economy. In this regard, we would like to reiterate the pan European strategy “European Forests 2020”, agreed at the FOREST EUROPE ministerial conference in Oslo in 2011, with its shared vision and Goal II for European forests. The strategy is mentioned in paragraph 13 of the action plan “as for instance”. We are of the opinion that this relationship is quite weak. Respecting the above mentioned forest policy arrangement in Europe, the action plan should not create “its own” vision and goals without taking into account FOREST EUROPE strategic approach.

*The wording has been changed to mention “and especially” the Forest Europe vision. However, some major ECE countries are not members of Forest Europe, and the Action Plan exists in a context of global commitments, notably in the context of UNFF, so the reference cannot be exclusively to Forest Europe.*

Secondly, the action plan identifies possible actions to be implemented under 5 pillars with their respective areas of activity. This is, principally, in line with principles of developing and implementing action plans as policy instruments that could foster implementation of policies and contribute to achieving policy objectives. The set of actions is comprehensive and includes actions that can make better synergies and add value to efforts already done (e. g. A.3.1, A.6.5, A.7.2, B.4.2, C.1.1, C.1.4) but, on the other hand, actions that overlap with existing work programmes, mandates and national policy instruments and/or whose added value is rather in question (e. g. A.1.2, B.1.7, B.3.2, B.3.7, B.3.8, D.0.1, D.1.2, D.3.1).

We would also welcome more explanation about the status of proposed possible actions. It is clear that they are voluntary. Anyway, if the action plan is meant “to inspire action and provide basis for ... plans and activities” (of other international and national organisations, bodies and processes), it rather fits to the concept of an indicative action plan. This should be clearly stated throughout the document.

*The overarching questions of status, strategy and implementation will be discussed by the special session.*

*Two remarks, stimulated by the contribution from Slovakia:*

- *The Action Plan must conform with many commitments made by UNECE member governments including of course the Forest Europe vision and goals but also elsewhere, notably commitments made in the Montréal Process, the EU and the UN system such as those from Rio +20.*
- *There will be no duplication or waste of resources if implementation is properly planned with the participation of all “possible actors”. Indeed where it appears there might be duplication, it is likely that mention in the Action Plan will reinforce the status and visibility of existing work, not duplicate it.*

### III. Comments by other Stakeholders

#### 1. European Forestry Institute (EFI)

##### (a) General Comments

The overall aims and principles of the Action Plan are very good and important, and EFI fully supports them. EFI has some comments and suggestions as regards to the more detailed goals and actions.

##### (b) Specific Comments

Action A.0: It would be important to acknowledge also the role of services more clearly. Services are already important, and appear to become even more important in the future for forest sector and the Green Economy development. Service may be related, e.g., to forest products (maintenance, planning, servicing, monitoring, programming, patents, R&D, education, consulting, etc.), forests (tourism, recreation, inventory and monitoring, forestry services, etc.), and more generally the “Ecosystem services” (climate services, protection services, etc.). The latter services are addressed in the document by Pillar D (“Ecosystem services”) and the related actions (D.0-D.3.3). However, Pillar D leaves out many of the services where markets already exists, and which do not fall to the category that are generally understood to be “Ecosystem services”.

In many EU countries and North America, the forest sector value added and employment is increasingly related to services, either to the services related to forest products, or to forests, as such. For example, the future employment and value added opportunities of the new forest products and biorefinery developments may be at least as much in these services, as in the actual manufacturing of these products. Indeed, a significant part of the actual manufacturing may be located in Asia and Latin-America, but the headquarter functions and services in EU and North America. This is a general trend observed in OECD countries’ manufacturing industries. This development and its implications should show up also in the Green Economy Action Plan.

Suggestion 1: add “the related services”.

Suggestion 2: It might be worth to consider adding the following actions under A:

A.4.5	Carry out studies on the current status of forest products related services, and other marketable forest sector services, and their impact in terms of employment and value added.	UNECE/FAO EFI, research organizations
A.4.6	Carry out research into the future social and economic drivers of forest sector services, for example, R&D, globalization and the trade in tasks, instead of trade in goods. (there are economic studies in this field, but not yet in the forest sector)	UNECE/FAO EFI, research organizations

*This is an aspect which has not been analysed up to now, but, as EFI says, may well be increasingly important, and a way in which the physical forests interact with the green economy. For that reason, it seems important to understand the situation and issues. The EFI proposals have been added to the Plan.*

Actions A.5.2, E.3.1, E.3.4: The policy support work has been added as one of the EFI’s strategic functions. This and the networking and research functions (including policy and governance research), provides good basis for EFI also to contribute on this action, if seen appropriate. In short, EFI expresses its willingness to contribute also on this action.

*EFI has been included in the relevant actions – which are open to all, but where EFI undoubtedly has highly relevant experience and skills*

**Pillar D:** EFI is mentioned in 4 different actions (D.0.1, D.1.1, D.1.2 & D.2.1), and we are happy to work on these. The work can be based on our extensive experience in ecosystem services related work. EFI is also planning to publish within next two years a policy report on valuing and paying for ecosystem services, which aims to help the movement towards a more harmonized approach at European level. This work would hopefully be of great benefit also for the above actions.

*EFI's readiness to contribute to the implementation of the Action Plan is noted with interest.*

## **2. European Network of Forest Entrepreneurs (ENFE)**

### **(a) General Comments**

ENFE appreciates that the action plan draws a strong focus on decent green jobs in the forest sectors. This follows our continuous request that sustainable forestry needs a sustainable work force. The action points under this pillar are relevant, and we underline the importance of a sustainable workforce, safety and health at work and of course economic viability of service enterprises as a key element for the future of forest management in Europe. We already join forces with the forestry training sector to overcome the lack of attractiveness of forestry work.

We understand that ENFE as the representation of the forest operations sector in Europe is considered as a key player in the development of the work force. Therefore, we appreciate that ENFE is named as an actor in most of the respective actions and as a contributor among the stakeholders. We are keen and willing to contribute to the actions.

### **(b) Specific Comments**

Action C 3.1: add the two important aspects "safety and productivity" in the headline.

It may read then: "Develop and share best practice for environmentally efficient, productive, safe and sustainable forest operations."

*The suggestion has been incorporated in the latest version.*

## **3. Forest Stewardship Council (FSC)**

### **(b) Specific Comments**

D. on “vision”: The formulated vision is a good starting point. However, we notice that the biodiversity is absent. We believe the Action Plan should be explicit in supporting agreed biodiversity objectives, such as in the Aichi Targets.

We propose to amend the first para under vision to include specific reference to halting the decline of biodiversity and restoring where feasible.

*Reference to forest biodiversity has been included as it does not appear in the Millennium Ecosystem Assessment list of “ecosystem services”, and appears appropriate here. A specific reference to halting forest biodiversity loss has also been included, although in “vision” it may not be right to list a specific objective, without listing all the others. Throughout, the term “forest biodiversity” is used to correspond to the scope of the Action Plan.*

F. on “Principles”: The principles described are comprehensive. Missing however is the need for involvement of actors outside the forest sector. Promoting a Green Economy

means steering the economy into a direction different from business-as-usual, which may come into conflict with some vested interests and certain perceptions amongst the public. These need to be identified and overcome or compensated for. Green Economy can only succeed if strongly supported in society. An example is “taking all externalities fully into account”: this might be difficult if there is resistance from other actors, the users of forest products, governments (who are influenced by civil society), etc.

*Reference to active involvement of civil society and the private sector has been included. The other points, though interesting, seem more illustrative and too detailed for a section on “principles”.*

**II B. on “low carbon forestry sector”:** As always, it is important to insist on consistency between different objectives and integration where relevant. A concrete issue is climate motivated action that could lead to reduced biodiversity (focussing on maximizing wood production for construction, biomass for energy, etc).

*It is agreed that the possible trade-offs between climate change and biodiversity are a major issue. Is it suggested to create an “area of action”? If so, concrete proposals for action would be necessary.*

**Objective A.1.:** We welcome the inclusion of actions regarding certification schemes. We hope that these will lead to more explicit recognition and promotion by governments in their own forest policies as well as policies on sustainable production and consumption, while taking care that only really participatory and environmentally and socially effective schemes are referred to. However, the formulations in this objective are not always compatible with the private nature of certification schemes.

This starts with formulation of the objective: “To ensure that consumers are fully and accurately informed whether the forest products they purchase come from sustainable sources, and that certification and labelling systems encourage the sound and sustainable use of wood and forest products.”

This title in fact has two different objectives inside:

- Ensure full and accurate information.
- Ensure that certification and labelling systems are doing in reality what they claim to do.

However, we do not see any specific action proposal regarding the first objective and propose reformulation of the title, or inclusion of additional actions.

*Providing the information is clearly the responsibility of the certification systems. However, governments, on behalf of society as a whole, have the possibility to monitor developments, satisfying themselves that full and accurate information is in fact being provided by the certification systems, and to provide an appropriate policy framework. Actions A.1.1, A.1.2 and A.1.5 should be seen as part of the implementation of the first part of the objective. The two parts of the objective cannot be separated from each other.*

As regards the second objective, we see “A.1.1. Maintain monitoring of developments in certification and labelling, preferably with more analysis of the impact of certification and labelling”, and “A.1.5. Review stakeholders’ experience with certification: has it changed silvicultural practice? Are the costs bearable? Has it opened new markets or developed old markets?” as relevant indeed.

However “A.1.2 Consider policy frameworks for unified labeling and certification systems for forest products” and “A.1.4. Further develop standards which satisfy more than one certification system” need explanation as regards merit and practical proposals on how to go about this.

Action 1.2: What labels and certification systems need to be unified, and what then would be the added value? Proposing to link/coordinate labels focusing on SFM and on, for example, carbon accounting, lifecycle assessment makes sense, but to “unify” may be too ambitious to be a realistic target. Moreover, on this issue several actions are proposed under A.5.

Beyond this: development of standards is a process basically done by each certification system itself, though in consultative processes involving also “others”. FSC, for example, has clear rules about transparency and participation of non-members, following the ISEAL Codes on Good Practice and own FSC standards. However, a decision of several systems to work together on common standards can only be taken by these systems themselves.

*A.1.2 refers to the policy framework which governments provide and within which certification systems operate. Concern has often been expressed about negative consequences to the sector as a whole of the intense competition between certification systems, in terms of costs and confused messages about the sustainability of forest management and wood supply. Governments, which have a responsibility to promote sustainable forest management in their country, provide the policy framework for certification, and may wish to consider whether the policy environment needs adjustment. The wording has been clarified by the use of “harmonized” rather than “unified”.*

Action A.1.4.: several certification systems have joined ISEAL, and that organisation has developed Codes that all its members comply with. In that sense the “further” develop above is understandable. However, in ISEAL, FSC is the only certification scheme focusing on forests, so this may be not so relevant.

If it is meant here that the two global existing schemes, FSC and PEFC, should develop common standards, we need to underline that neither FSC, and we believe, nor PEFC currently have such intentions, and given their different governance structures this is not realistic either. This Action Plan as such does not give specific arguments that such a move would be particularly beneficial for the green economy.

*There is no intention to propose to unify labels or certification systems. See above and the response to Canada. The intention is not to advocate the development of common standards, but to explore ways to limit costs and increase the clarity of the certification message.*

We propose to delete A.1.4. and clarify the purpose and added value of A.1.2.

Action A.1.3: “Evaluate the risks and benefits of including genetically modified trees in sustainable forest management and encourage public dialogue on this question”

This is a challenge neither related to the objective of full and accurate information nor specifically related to certification and labeling schemes. This is a question of a more general nature. It is clear that the two large international forest certification schemes currently do not allow GMO use in forest management, but it is up to them to decide when and how they open a discussion on this.

We propose to move this activity to elsewhere in the programme so that it gets more general purpose.

*Moved to section A.0, as part of discussion of strategies.*

Objective A.2.: The five proposed actions under A.1. show a clear interest in certification schemes. In particular A.1.1. and A.1.5. can help to assess further what contribution certification of forest management and forest products already has. It would therefore be logical that in the proposals regarding demand, special emphasis is placed on promoting demand for certified products, as a way to help certification to expand further in Europe.

*The suggestion has been incorporated in the latest version.*

Objective A.7: The actions under A.7. refer to timber legality, not to sustainability. Complying with existing national legislation is an important first step towards sustainability, but it is not the same.

*“Sustainably” removed from title. However, note proposed new action on the “gap between sustainability and legality” (new A.7.3)*

#### 4. Global Fire Monitoring Center (GFMC)

##### (a) General Comments

While the suggestions for Pillar B may be logic and a desired way to go, the Pillar D also includes a suggestion. Forest services for human health are indeed positive, but the effects of forest fire can be extremely disastrous, as we have seen in Western Russia in 2010.

In other words, when looking at the benefits of forest for human health one must also look at the potential hazards and risks.

*The concept of risks to human health from forests, notably forest fires, is incorporated into D.3, as well as a balancing mention of positive influence of forests on human health. New, more precise and detailed wording for B 3.5 has been proposed for the action.*

B.3.5 (track changes mode): new wording (more detailed and specific) proposed for the action.

*The suggestion has been incorporated in the latest version.*

#### 5. Central Union of Agricultural Producers and Forest Owners, Finland (MTK)

##### (a) General Comments

Should the Action Plan be more focused? This plan is very wide considering the resources.

*Resources were not taken into account as the Plan is open for “possible actors” from all sources, and is not a work programme for ECE/FAO.*

##### (b) Specific Comments

Pillar D; on “vision”: Targets should be more specific

*Specific targets would not be appropriate in an inclusive, voluntary, Action Plan. Who in this context would be considered as responsible for the commitments to the specific targets?*

Track changes modification to Vision: Add forest owners and forest industry to list of stakeholders

*The suggestion has been incorporated in the latest version.*

Track changes modification to Vision, second bullet: add “while also providing tools for climate change adaptation of societies”

*The suggestion has been incorporated in the latest version.*

D para 12; on “within the context of a changing climate”: Can be read to refer only to ecosystem services thus limiting the scope of ecosystem services to only climate-related services.

*“Within the context of a changing climate” refers to the whole paragraph, not only the ecosystem services and should be seen as a general constraint on the whole green economy*

*(that it must contribute to mitigation and adaptation of climate change). Text slightly modified to improve clarity.*

Title of Pillar A (track changes): add “and profitable” after “sustainable”

*The wording has not been changed as economic aspects, which include profitability, are already contained in the concept of sustainability, alongside social and ecological sustainability. It would not seem appropriate to highlight only one of the three dimensions.*

Pillar A (track changes): add a new area of action “measures to increase the use of wood”  
(No specific actions were proposed)

*The wording has not been changed, as many of the actions under Pillar A, notably under certification, procurement, innovation, LCA, green building and legality are intended to provide a sustainable framework within which it will be possible to increase the use of wood, notably by removing some obstacles. Action A.0.1 and A.0.3 also address the strategic dimension of increasing the use of wood in a sustainable way. Communication (area E.4) is also an important part of increasing the use of wood.*

II A; on “Wood mobilisation and increasing the potential sustainable wood supply”: There is no meaning in increasing wood supply if there is no demand for the timber.

*This is true, but the European Forest Sector Outlook Study (EFSOS) and many other studies say there will be increased demand, especially if energy demand is included and wood mobilisation will be necessary if the forest sector is going to make a full contribution to the green economy*

Action A 1.5: Has it given a competitive edge to its users throughout the value chain?

*Question added/combined with addition by FSC.*

Action A 3.3: What does this mean?

*Improve our understanding of what are the major influences on how much wood is “mobilized”, through scientific analysis.*

Pillar B (track changes): Change title to “A low carbon society”

*Wording not modified. While changes in the whole of society are clearly necessary for a green economy, this Plan addresses only the forest sector and could not include actions aimed at other parts of society, which is implied by the proposed modified title.*

B2 Objective (track changes): delete the second part, from “notably by ensuring ...”  
(statement of the so-called “cascade principle”)

*Wording deleted from the objective, although action B.2.1 specifically refers to analysis of the cascade principle. The special session may wish to consider whether the implementation of the “cascade principle” should figure as one of the objectives of the Action Plan.*

D.2.4 (track changes mode): last part of action to read “in developing and providing ecosystem services, for instance forest tourism/ecotourism services”.

*The suggestion has been incorporated in the latest version.*

Pillar E (track changes): Change to fifth point on communication and promotion, add “wood products and forest sector”

*The suggestion regarding the forest sector has been incorporated.*

## **6. Programme for the Endorsement of Forest Certification (PEFC International)**

### **(a) General Comments**

PEFC International welcomes the “Action Plan of the Forest Sector in a Green Economy” as a bold step towards an improved coordination of the very diverse forest sector activities, with appropriate consideration of the sovereignty of various actors and the importance of bottom-up approaches.

In order to streamline the process of collecting feedback, we are limiting our comments to those areas of the Action Plan that name “certification systems” as possible actors.

We appreciate the on-going dialogue and engagement with UNECE/FAO and all other actors involved in the process.

### **(b) Specific Comments**

A.1.1: The ongoing monitoring of developments in certification and labelling, as currently done through the UNECE/FAO Forest Products Annual Market Review, is an important and useful tool for the forest actors. Analysis of the impact of certification, specifically in regards to its contribution to a green economy/green consumption appears beneficial. For this purpose, addition of “with more analysis of the impact of certification and labelling in the marketplace” at the end of the sentence to be considered (also to differentiate with A1.5 (see below))

*The suggestion has been incorporated in the latest version.*

A.1.2: Concerning policy frameworks, the Action Plan should consider referring to the Rio Forest Certification Declaration (<http://treee.es/rio-dec>) as an example of a policy framework. The Declaration was presented at the high-level side event “A common framework to attain the full potential of forests for sustainable development” (<http://treee.es/rio20-side>) at the Rio+20 Conference on Sustainable Development in June 2012. The side event featured, among others, Jan McAlpine , Director, United Nations Forum on Forests (UNFF); Antônio Carlos Hummel, Director General, Brazilian Forest Service ; Estebancio Castro Díaz, Executive Secretary, International Alliance of Indigenous and Tribal Peoples of the Tropical Forests (IAITPTF); Lennart Ackzell, Vice Chair, International Family Forestry Alliance (IFFA), Duncan Macqueen, Team Leader – Forest, International Institute for Environment and Development (IIED), and William Street, Chairman, Programme for the Endorsement of Forest Certification (PEFC International).

*It may be invidious to cite one policy framework rather than another, especially as this one is not formally approved in the UN framework. National policy frameworks are also important.*

A.1.3: The issue of genetically modified tree concerns all stakeholders. Possible actors therefore need to include also UNECE/FAO, consumer organizations, and forest owners.

*The suggestion has been incorporated in the latest version. The Action has been moved to section A.0, as it is not a pure certification question but raises issues for many parts of the sector.*

A.1.4: Concerning the “possible actors, it is important to note that the development of national standards is a multi-stakeholder process. Therefore, possible actors should include all stakeholders. However, we believe that this possible action should be expanded to focus more on the potential contributions that forest certification standards can have on the green economy. For this, it is important to “Further develop standards in a holistic manner that consider forestry in the context of other land uses, making forest certification relevant to non-traditional forest users, and adaptable to the needs of those that are not yet certified and

for whom forest certification may currently be a barrier” in order to further encourage the sound and sustainable use of wood and forest products.

*See responses to Canada and FSC, clarifying that the intended aim of A.1.4, as it stands at present, is to develop national standards which can help forest owners satisfy the requirements of more than one certification system, while following national guidance, thus reducing costs. The intention of the text proposed by PEFC seems different in that it addresses the question of how standards are developed, within certification systems. A new action along those lines has been introduced (new A.1.6).*

A.1.5: This action point seems to be overlapping with A.1.1, yet focused on forest management. Consider clarification, which may be achieved by replacing “stakeholders” with “forest owners/managers”: “Review forest owners/managers experience with certification [...].”

*Overlapping is not intended. A.1.1 refers to regular monitoring of developments, A.1.5 to a more analytical and questioning one-off exercise after 15-20 years of experience of certification. For A.1.5, it is important that other stakeholders than forest owners/managers (e.g. consumers, retailers, traders, manufacturers) be asked whether the method has also been useful to them. The wording has been modified to clarify.*

A.2.1: The development of procurement policies is also covered in the Rio Forest Certification Declaration. Therefore, the last sentence could be expanded to read “(referring to international standards and policy frameworks such as the Rio Forest Certification Declaration).

*The suggestion has been incorporated as part of rephrasing of A.2.1 in the latest version.*

## 7. SLU (Swedish Agricultural University)

*(Comments received in track changes mode, without comments)*

Principles (F): Add a new principle **“The forest sector provides products and services of high user/consumer value”**

*The suggestion has been incorporated in the latest version.*

A.5.4 (track changes): Specify declarations and add “that are impartial between materials”.

*The suggestion has been incorporated in the latest version.*

C.1.4: Add “as well as key personnel along the processing stages (operators, engineers, designers, developers, architects etc.)”

*The suggestion has been incorporated in the latest version.*

## 8. Antoine de la Rochefordière (Consultant, FLEGT expert)

### (b) Specific Comments

Action A.7: The Action no. 7 comes under Pillar A of the Action Plan: "Sustainable production and consumption of forest products", which Goal is: "Patterns of production, consumption and trade of forest products are truly sustainable", while the related area of activity is to: "Ensure and monitor the legality of forest products".

There is a need to bridge the gap between legality as per the related area of activity, on the one hand, and sustainability as per the Action and the Goal on the other hand.

A likely output of such action is the need to consider further action to fill-in the gap between legality and sustainability in the law, with a view to continuously improving the law and make it closer to sustainability principles.

*The suggestion has been incorporated and new action added A.7.3.*

## **9. Olin Bartlomé (Lignum, Switzerland)**

### **(a) General Comments**

II. A: It may also be mentioned that it is very important the forest owner/care taker is aware what forest products are needed at the other end/what products are being produced out of the forest products respectively. E.g. what kind of trees, which dimensions, what quality etc. Often forest products are produced (grown) which are easy or common for the care taker and it is not looked at what the market needs etc.

*The importance of producing for real demand is covered in Pillar A on sustainable consumption and production.*

II. B.: I agree on the substitution of non-renewable products and energy. However, I would like emphasis here – if it comes to energy – that also forest have their limits. Thus not all non-renewable energy can be substituted (by far) and solar power etc. is needed in addition/mainly to achieve a big change in this respect. Having this in mind I would like to point out it is most important to use wood firstly as a substitution of non-renewable materials. When these wood products have achieved their end of live (after recycling etc.) they shall be used as energy (use of cascade).

*These issues are also covered by Pillars A and B.*

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