

Stage – Interim draft preparation consultation comments & review

Title: Theme A (P & I)

Date : 7 September 2015 - 20 September 2015

Location : New Delhi

Stakeholder		Comment	Review
	1)	1st para- last sentence: Another issue that may be addressed here would be the availability of resources – physical, financial and human, to ensure compliance to relevant laws and statutes.	
		physical resources means what?	Physical resources here indicates Office space, vehicles , infrastructure etc.
	2)	Criterion 1.3: The FME, its managers and all participating FMUs (Forest Management Units) shall respect and implement the applicable provisions of all binding international agreements and conventions such as CITES, ILO Conventions, ITTA, Convention on Biological Diversity etc.	
		suggestion: applicable provisions of all binding int'l agreements and conventions to be listed also, otherwise FMEs will agree to comply without even knowing what they are agreeing to comply	A list covering and comprising of all the legal agreements/laws complying under this category will be prepared. Also, the same will be covered elaborately at the indicator level
Mr. A K Bansal	3)	Criterion 2.1: The FME managers shall demonstrate availability of clear and legally secure demonstrable evidence of long-term forest use rights to the land (e.g. land title, customary rights, or lease agreements).	
		Long term means what: in terms of no. of years? crop	Long term with reference to the Mangemnet plan cycle

		rotation?	
	4)	Criterion 2.2: Local communities with legal or customary tenure or use rights shall maintain control over forest operations and resources (to the extent necessary to protect said rights or resources), unless they delegate control with free and informed consent to the state or other agencies. In case of state owned forest lands, use rights of all concerned stakeholders would be identified and recorded in writing. In cases where the rights have been settled, notifications to the effect of rights settlement shall be made available	
		Under what circumstances the customary tenure or use rights may be delegated to the State since they might have been recd from the state in the first place? may add orders of competent authority (notification may mean Gazette notification).	orders of competent authority may be added.
	5)	Criterion 2.3: Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation.	Accepted
		may insert " in place and "	
	1)	The wordings of the Principles may be attempted to be such so as to make them look different (from other existing ones);I know the job is tough and may not be critical but we should make effort; I will try to work on it and put up in the next meeting if possible.	This has been accepted and was considered and accordingly the wordings have been slightlymodified after lot of discussion in SDG Drafting Group meeting on 17th oct .

Mr. A K Varma	2)	For the purpose of indicators for these principles of Theme A, it will be necessary to lay our hands on the latest local relevant ACTS/LAWS , and international Conventions, Protocols to which GOI is signatory and the drafting committee should work on it. I can suggest an alumnus of National Law School University of India in the next meeting to help us out.	Accepted
Mr. U V Farooqui	a)	In the national and local context and from the field point of view, I feel everything is covered, hence does not require any addition.	
		However, the criteria seem to be broad and if possible can be splitted further as there are both national and state laws which differs from state to state. Hence, if possible and if it is not increasing number of criteria, National laws and State laws could be covered in seperate criteria	The laws may differ state wise and the FME in that state will follow the laws of their state. A list of all the laws will be prepared and attached along side the final Standards
Mr. Sushil Sehgal	1)	Criterion 2.2 – It should be free, PRIOR and informed consent	accepted
Forest Plus	2)	Criterion 2.3 – I think there is a need to further qualify "appropriate mechanisms"	As stated in earlier reviews - mechanisms differ from state to state ,an guidance/ explanatory note will be prepared and this will be covered in that.
Mr. D N Dutta			
You and I foundation		Principle -1	

	Criterion 1.1 is very important before setting up an enterprise where the FME can have a proper guide line for day to day operations. But If any technical /operational issues arise then whom to coordinate?Would NCCF's Role would be to bridge between the Authorities & FME's?	will be covered at Indicator level
	1.2 The Fees to be decided as per the local resources not uniform throughout the country.	Accepted
	1.4 To ensure that a report mechanism can be developed. Resourcing mechanism is equally needed to track.	Will be covered in the subsequent Monitoring Theme
	Theme A Background	
WWF		
	1) A standard definition of FME and FMU must be given at the outset (currently not provided in the guidance docs) - Clarity required on who are these FME/FMU entities, how will these be governed, what would be the nature of relationship and accountability of these to other stakeholders and vice versa. (Vuppal)	A Glossary of terms will be prepared for reference
	2) Please also add 'CBD' to this list, because it includes benefit-sharing and access to resources etc. (by Vuppal)	Accepted and it will be added to the list of legal agreements as decided above
	3) The customary/traditional rights that people enjoy are often not documented. The use of only the word 'documented' here is therefore restrictive. (Vuppal)	Only documented information can be verified during an audit process, things not documented in any form cannot be verified.
	FRA will need to be covered here as well.	accepted
	4) Rights are sometimes not exclusively 'use rights'. This is restrictive. They can be also be the right to worship or even protect -- e.g. Sacred groves, where people do not "use" anything but simply protect. -- this needs to be	users right includes all including right to worship

		reflected in this theme. (Ms. Rebecca)	
	5)	The exercise of rights should be subject to silvicultural availability (of the forest estate) and status of regeneration. (Mr. Pande)	Will be covered in the subsequent Themes on Managemnet plan and environment specific theme
	6)	compliance by whom and how needs to be specified clearly - perhaps more relevant to be kept in mind at the 'indicator' level. (Vuppal)	Accepted ; will be detailed at Criteria level
		P1, C - 1.4	
	1)	The extent of encroachments in the permanent forest estates shall be a cause for concern as it threatens the very existence of the resource itself in the long run scenario. (Mr. Pande)	Accepted; will be covered at the Indicator level
		P1 C - 1.5	
	1)	In the cases where forests are managed by govt officials - it is better to specify that a commitment must be made by the forest dept instead of individual forest managers as they keep changing (Vuppal)	Forest Managers here is refferred to Forest Department or who so ever incharge of maintainence of the Area (in India 95% is under Govt to Forest Department); Rest the guidance/explanatory note will cover the clarifications
		P2, C- 2.1	
	1)	Clarity needed on for whom (Vuppal)	as per accepted managemnet plan
	2)	Customary Rights subject to silvicultural availability (Vuppal)	as per accepted managemnet plan
		-	
		P2, C-2.2	
	1)	rights relating to resource use, e.g. water, must be included explicitly (Rebecca)	All the resources will be covered
	2)	Please do include the word 'PRIOR' - FPIC mechanisms	Covered

		should be clearly spelt out. (Vuppal)	
	3)	The process of FPIC being followed should also be documented (Rebecca)	Accepted
	4)	The term 'use rights' comes across as very restrictive All types of rights relevant here should be recognised explicitly. (Vuppal)	Covered in guidance/explanatory note
		-	
		P2, C-2.3	
	1)	Should engage with affected stakeholders - steps taken towards resolution of disputes should be documented (Rebecca)	If the disput is documented then steps for Resolution will also be documented
	2)	Use Rights This will need to be elaborated (Vuppal)	Covered in guidance/explanatory notes
		-	
		The word forest has not been defined so far, the existing arrangement to adopt the dictionary meaning of forest as per the orders of the Honorable Supreme Court. The MoEFCC is currently attempting definition of forests in consideration with the states and will be seeking endorsement of Honorable Supreme Court to the definition of forests sought to be adopted. The definition will have serious bearing on the management of forests and as such have implications for the national standards	"The term forest doesn't have any definition in India. It is defined on the basis of the 1996 Supreme Court order which says anything should be forest if it meets one of the two definitions: either the dictionary definition or land recorded as forest on any government record. Various state Governments are identifying forest lands as per above directives of Honorable Supreme Court. Meanwhile MOEFCC has also taken action to define the term forest. As and when the Govt finalises the definition of Forest, the same shall be adopted
	1)	In THEME description, FME and FMU may be defined for clarity .	will be covered in the Glossary

<p>Mr. A K Srivastava, Executive Director, NCCF</p>	<p>2)</p>	<p>In C 1.3 a mention of the Non-legally Binding Instrument on All Types of Forests (NLBI), commonly known as the “Forest Instrument”, adopted by the United Nations Forum on Forests (UNFF) and CBD may also be made. The adoption of the Forest Instrument has proved an important step in promoting sustainable forest management globally. The Member States of the UN agreed on a series of policies and measures at the international and national levels to strengthen forest governance, technical and institutional capacity, policy and legal frameworks, forest sector investment and stakeholder participation, within the framework of national forest programmes (NFPs).</p>	<p>CBD is covered as above. The issue of mention of non legally binding instrument (NLBI) or Forest Instrument on All Types of Forests was discussed in much detail and concluded that mention of these is restricted by the very core of the Theme A and its Principles which talk of applicable laws. It was also noted that above mentioned Forest Instrument adopted by UNFF is an agreed way of managing their forests by the member nations and would always be a guiding principle for them.</p>
	<p>3)</p>	<p>In P 2 C 2.1, a specific mention of the implications of Forest Right Act 2006 may be made. Also, there is a need for harmonization of The India forest act , forest rights act and the PESA. The draft standards should address this important concern also.</p>	<p>FRA suggestion is accepted and already included. This is a very important issue and the concern for harmonisation is also shared by the members. However at this stage it is beyond the scope of the SDG/NCCF as these are policy issues that need to be tackled and resolved by executive orders /legal harmonisation by the Government. As and when any progress is achieved with regard to above legislative issues, the same will be incorporated in the standards appropriately . However the issue will be re-examined at the time of piloting and pilot study and a final call will be taken while finalising Version 01 of the draft standards</p>

	<p>4) There has been a long debate on the status of Bamboo, whether it is a tree or grass , the draft standards should address this aspect also</p>	<p>Yes indeed the end less debate on the above issue is something that needs to be addressed. The group after deliberation at this stage decided to follow the definition of bamboo and felling and transit /transport permits as prevalent in the respective states,as the forest owners, till an All India uniformity is achieved. The issue will be re-examined at the time of piloting and pilot study and a final call will be taken while finalising Version 01 of the draft standards</p>
	<p>5) In P 2 C 2.2 , water may be treated as one of the most important forest produce. User rights over sharing of water resources is a serious concerns for the communities.</p>	<p>The word Forest produce has two aspects;one which is generally understood and another which is legally defined under various forest act and water does not appear as forest produce under any of these two catagories.However it is well accepted that water conservation is an important aspect/output /goal of SFM and is included as one of the chief objectives of forest management including those falling in HCV category and is part of subsequent themes.In so far as use rights, as distinct from user rights, over water resources (and similar other forest resources) are concerned, the group realises the concerns of communities and thumb rule to be followed is to go by traditionally accepted and well recognised such rights that are under community's enjoyment and will always be the guiding principle in this theme,which will be further explored at indicator level as well as at the time of piloting and pilot study.</p>
<p>Note</p>	<p>based on the comments received following three supporting documents will be prepared along with the standards:</p>	

	1	List of Binding laws and agreements	
	2	Glossary	
	3	Guidance/explanatory note	

Title: Theme B

Date : 5th December 2015

Location : Delhi

Stakeholder		Comments	Review
Mr. A K Bansal	1	<p>Theme B</p> <p>Principle 3: Development and implementation of a Management Plan/Working Plan</p> <p><u>Criterion 3.1:</u></p> <p>c. Maps describing the forest resource base including protected areas, planned management activities and land ownership.</p> <p>will it include DGPS maps as required as per the orders of the Apex Court?</p> <p>d. Human and capital resource allocation for plan development so as to develop a functional and effective management plan.</p> <p>we are nowhere talking about resource allocation both human and capital for implementation of management plan, which needs to be included appropriately</p>	<p>Considering that many of the small enterprises doesnot even have the DGPS Map Facility, hence it will be too restrictive for the small enterprises</p> <p>will be elaborated at the indicator level</p>

	A	<p>For Discussion</p> <p>Should we include a fundamental principle and aspirational principle concept –like fundamental rights and directive principles of the state? So that contentious issues like these could be tackled.</p>	
Mr. A K Varma	B	<p>Also to discuss the impact on Certification and Standards of India's Intended target of reducing carbon emission by 3 to 4 billion tonnes by increased afforestation as part of its declaration for Paris Conference Nov 2015- COP 21 (6 million ha afforestation as per CAP 2009 of India).</p>	
	1	<p>Theme B</p> <p>Vuppal Comments</p> <p>No mention of peoples use, rights, FPIC etc. or how they will integrate the use and rights</p>	<p>PA cannot be excluded , Certification will add to the branding aspect of the Pas as well. Also this aspect has been covered in the THME F indetails</p>
	2	<p>Plus PAs should be kept out of purview of the management plan. PAs are like NO go areas</p> <p>Principle 3: Development and implementation of a Management Plan/Working Plan</p>	

WWF

Criterion 3.1: Appropriate to the scale, intensity, and complexity of operations, there shall be a written management plan for the defined forest area that addresses the subjects and plan components enumerated in this criterion, as well as provisions for protection against forest fires, forest pests and diseases, illegal settlement and harvesting, hunting and fishing policies, safeguarding archaeological sites, and others. The FME shall develop and maintain a management plan and supporting documents which shall provide:

add in the write up - written management plan that demonstrates commitment to long-term social, environmental and economic viability.

h.Provisions for monitoring of forest growth and dynamics.
also needs to include: regeneration; and harvest at sustainable yield levels.

k.Approved Site specific plans for nurseries and plantations(ANR/NR/AR) -including, but not limited to site selection, species selection, soil and nutrient analysis, appropriate silvicultural interventions, appropriate pest and nutrient management regimes and post planting care.

Does this aspect of pest/nutrient management practices require further elaboration / more detailed parameters?

Criterion 3.2: The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic conditions prevalent in the area. Any change in legal status of the land or change in use rights should be documented in the management plan.

MP indicator will include the provisions for short , medium and long term commitment of management including silvicultural, ecological and socio-economic practices

covered in the subsequent points

this particular concern will differ from area to area and will be covered in the concerned area plan

Accepted; moved under P4 as C4.7

Suggest that this criterion 3.2 be moved under Principle 4

Criterion 3.4: There shall be a due process of stakeholder identification, consultation and engagement during the process of plan development and implementation.

Specify: this also needs to be documented.

accepted; will be elaborated at the Indicator level

Principle 4: Monitoring, Assessment and Review of management plan and its implementation

Specify: Results of monitoring need to be used to develop measures for improvement as indicated to be necessary

covered in 3.2

Criterion 4.1: Appropriate to the scale and intensity of operations, forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:

a. Yield of all forest products harvested.

Carbon stocks / sequestration / GHG emissions ?

accepted and has been added under the C4.1

e. Costs, productivity, and efficiency of forest management.

add in the write up - key economic performance indicators like yields, revenues and costs

covered in the subsequent write up

Criterion 4.4: Based on the scale and intensity of forest management activities and the local conditions, contents and indicators of forest monitoring shall be defined, proper monitoring systems and procedures shall be established, and the approaches, frequency and intensity of forest monitoring shall be clearly defined.

Suggest that these indicators should also have an element of continuous improvement / revision in response to effectiveness

This spirit is in build in the standard itself .Will be further elaborated at the indicator level

	<p>gauged on the ground</p> <p><u>Criterion 4.5:</u> The forest manager shall monitor biodiversity, using scientifically based monitoring methodology developed in consultation with stakeholders and relevant experts, to determine if values are being maintained or enhanced within the defined forest area.</p> <p>add in the write up - and adapt management where necessary for improvement.</p> <p><u>Criterion 4.6:</u> Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</p> <p>Specify: independent certification bodies/organisations</p>	<p>accepted</p> <p>accepted</p>
Dr Pandey	<p>Criterion 4.8 : While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators</p>	
	<p>the summary of monitoring may be put on web & the summary of research aivotes may also be noted and put on website.</p>	<p>let that be decided by the FM</p>
note	<p>Comments recived after second round of consultation</p>	
	<p>based on the comments received following supporting documents will be prepared along with the standards:</p>	
1	<p>Glossary</p>	

Title: Theme C

Date : 5th December 2015

Location : Delhi

Stakeholder	Comments	Review
Mr. A K Bansal	<p data-bbox="331 627 450 655">Theme C</p> <p data-bbox="286 707 309 735">1</p> <p data-bbox="331 707 1424 823">Principle 5: <u>Criterion 5.2:</u> Management planning and operations shall incorporate the results of evaluations of social impacts-</p> <p data-bbox="331 887 1518 959">need to include environmental impacts along with social impact that have been assessed in the course of EIA in criterion 5.1</p> <p data-bbox="331 1214 1518 1362"><u>Criterion 5.10:</u> The FME shall not divert any forest land to plantations or non-forestry purposes, without the express permission for the same, obtained through the due process of law. Any such conversions that have taken place needs to be within the provisions of the Forest (Conservation) Act, 1980.</p>	<p data-bbox="1563 791 1688 820">Accepted</p> <p data-bbox="1563 1058 2040 1362">The point has been discussed among the members and after considering the present law scenario for the status of diversion of lands for plantaton, the write up of the Criteria will be improved and the issue will re open for discussion during wider consultation. This</p>

	<p>2 Principle 6</p> <p>what types of activities are included here in the term "plantation". Some plantation activity may be a part of approved management plans.</p> <p><u>Criterion 6.1:</u> Forest managers shall undertake forest management operations in such a manner to progressively increase forest carbon levels and ensure that management operations along the life of the enterprise shall be carbon positive.</p> <p>this is not very clear. what about carbon level at the time of timber harvest at maturity/end of rotation as per approved ,management plans? forest carbon - how many carbon pools are we talking here for clarity ?</p> <p>is it defined any where?</p>	<p>issue has been flagged for later now. Further on issue of plantation, the definition of plantation needs to be clarified here.</p> <p>change has been made</p> <p>changed</p>
	<p>Theme C</p> <p>Principle 5</p> <p>5. Should be called Impact study as this is what is intended here.</p>	<p>accepted</p>

Mr. A K
Varma

Criterion 5.1. In fact this should come in the principle 4 () as only then 5.2 can be taken care of.

discussed

In fact Principle 4 and 5-consequently theme B and C - can be merged with suitable heading as most of what is said in theme C and principle 5 actually fits in theme B and principle 4 if we have to achieve logical implementability in the field. I think other standards also have it this way.

discussed

Criterion 5.10 .Contentious and needs to be discussed. My suggestion is to drop this altogether as we have already covered such aspects in Legal Compliance theme and no need to flag it here again

Flagged for wider stakeholder
consultation later

Principle 6

This is again to be brought in the certification process with great care and deliberation as howsoever desirable it may be the fact is that to link it (certification) with climate change and carbon mitigation /enhancement aspect is fraught with not only practical issues but may actually deter potential forest certificate seekers . But having recognised this as an important issue we have to find a way. Hence it is suggested that it may be called Carbon Contribution from the Forest

discussed

- to maintain and enhance capacity of forests to carbon cycle contribution and to minimise green house gas emission from the use of fossil fuel by forest activities by sound management of the forest and its eco system, bio mass and carbon pool including standing vegetation , dead ,fallen and coarse wooden debris and soil carbon

discussed

		Forest manger is supposed to take the forestry and related operations as prescribed in the working/management plan; so this aspect should be built in theme B (Principle 4) first.	
WWF	<p style="text-align: center;">Theme C Vuppal comments</p> <p>1 Should have indicators on basis of which they will carry out the impact assessment.. Generic statements do not have sufficient meaning</p> <p>2</p> <p>Introductions of exotics should be prohibited or banned (5.6)</p> <p>Principle 5: Forest Management Impacts – Social, Economic and Environmental</p> <p><u>Criterion 5.1:</u> The FME shall undertake a social and environmental impact assessment to understand the impact of its management activities on the forest ecological environment, soil and water resources as well as on the local population in and around the forest management unit (FMU) or those dependent on the forest or forest resources for food, shelter or livelihood.</p> <p>Should explicitly mention: Need to make summaries of social and environmental impact assessments publicly available (online).</p> <p>Monitoring and mitigation of impacts of infrastructural development and transport activities ?</p>	<p>will be covered at the Indicator level This is furtherdetailed and covered under Theme E; any further discussion on this will be carried only after consultation of Theme E Is over</p> <p>will be further discussed in the wider consultation</p> <p>addressed to include all activities and modified</p>	

Criterion 5.3: The FME shall ensure that forest management operations do not threaten or diminish, either directly or indirectly, the resources and use rights of the local dependent population. In case forest management operations lead to loss or damage to property, resources, livelihood or use rights of the local people, then there shall be mutually agreed upon procedures for resolving these grievances and providing a fair and equitable compensation to the afflicted parties.

Specify: Process of grievance redressal needs to be documented and publicly available.

accepted

Criterion 5.5: The use of **chemicals** shall be strictly **controlled** and the environmental impacts caused shall be minimized accordingly. FME shall minimize chemical **use** required to achieve management objectives while protecting employees, neighbours, the public and the environment, including wildlife and aquatic habitats.

*specify: chemical pesticides and fertilisers
and progressively phased out through appropriate silvicultural practices
through integrated pest management practices*

Disposal of waste

accepted,

Has been covered under Theme E
accepted

to be detailed at the Indicator level

Criterion 5.7: Safeguards shall exist which protect rare, threatened and endangered species and their habitats. Conservation zones and protection areas shall be established, appropriate to the uniqueness of the affected resources and the scale and intensity of forest management. Hunting, fishing, trapping and collection shall be controlled

Sustainable extraction of NTFPs ?

Has been taken in Theme D

	<p><u>Criterion 6.2:</u> The forest managers shall demonstrate a commitment to adapt and integrate climate positive activities in the conduct of the enterprise viz., minimizing fossil fuels usage by forest operations, utilization of renewable energy, resource optimization etc.</p> <p style="text-align: center; color: red;">reduce net emissions of GHGs from the FMU</p>	<p>to be discussed during the wider consultation ; GHG emissions might not be a viable option for small holders and private enterprises</p>
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- Note
- 1 Forest Managers to be replaced by FMUs
 - 2 Climate Change To be Replaced by Carbon Pool, in the required places

Theme D				
Date 30.1.2016 delhi				
Stakeholder		Comments	REVIEW_12.2.2016	Review_20.2.2016
		Background & Title		

Mr. A K Varma	1	mention of carbon enhancement/carbon mitigation/carbon balance/carbon neutrality aspects associated with forestry	modified in the write up	accepted and modified in the write up (carbon sequestration added as it covers all the aspects as such)
	2	Instead of NTFP we should use NWFP ever where used	In indian context - NTFP is more appropriate; however we can discuss the common notation to be used which can be changed at later stage	modified and taken care of
Mr. Philip Tapsall	3	the theme is named Sustainable and Economic Utilization of Forest Resources but only really deals with FM. Would not supply chain come into this at all? e.g. pre-consumer waste?	this comes under Chain of custody and will be covered under Chain of Custody standard	as mentioned in the review_12.2.2016
		establishment of written framework with guiding rules for sustainable extraction of NTFPs including rules related to nature and type of extraction, intensity and frequency extraction and subsequent fallow periods etc	changed to "guidelines" and these are system driven	as mentioned in the review_12.2.2016
Ms. Vishaish	4	Who decides these and what is the process?	It is system driven , and will work as per the Management Plan	as mentioned in the review_12.2.2016
Principle 7		Principle 7: Inventory of forest resources and sustainable harvest regimes for all timber, bamboo, NTFP etc.		
Ms. Vishaish	5	Does the FME take into account the working plan regimes??	Ys, it does and it should.	as mentioned in the review_12.2.2016

		Criterion 7.2: The FME shall undertake assessment of growing stock of the defined forest area, as well as define the Annual Allowable Cut (AAC)/Annual Removable Volume (ARV) for all extractable forest produce		
Mr. A K Varma	6	Annual removable...is it the same thing as Annual allowable? Or something else is also envisaged. Pl elaborate as removable would mean what is fit to be removed, but if it is not allowed to be removed then it cannot be removed (e.g. in almost entire country, felling of green *standing trees in natural forests is not allowed even though they might be fit to be silviculturally removed; similarly removal of any timber/ bamboo/other forest produce from PAs/ HCV forests is not allowed, though they might be removable again on economic grounds and silviculturally).	That is why both the terms have been utilised. In private/plantations , there rnt any restrictions , there AAC shall be implemented, but where legal restrictions are present - ARC will be used.	This was discussed in detail and to avoid too many terminology at the C level it was decided to modify the write up as -" standard independent assessment methodology" as the assessment method may differ as per diff managemnt type. The same can be further elaborated at the I level and also defined in the glossary
		So either we do away with this word or add as per sanctioned management plan after ARV	private forests/plantations may not have a sanctioned plan	
	7	Add ARQ (Annual Removable Quantity) as many NWFPs are measured by weight e.g. gum, honey, medicinal plants etc).	accepted and modified as per that	reviewed above
	8	Also to replace extractable with permitted to be extracted in the last line.		

Ms. Rebecca	9	Independent assessment ?	"internal assessment" but either way the FME will need to justify the parameters & basis for asses to the auditing agency	can be covered at I level
		Criterion 7.3: The FME shall ensure that the rate and extent of forest produce extraction is maintained at levels that are permanently sustainable, and that annual removal of forest produce is well within the limits set by the AAC/ARV for each individual forest resource (i.e., either timber or non-timber)		
Mr. A K Varma	10	Remove the word permanently as it seems to be superfluous here.	accepted & modified	
Ms. Rebecca	11	Limits set - to be explicitly mentioned in FME management plan ?	it is an open end topic as the harvest limits could be either defined in the Management Plan or revised annually by the FME	It has be mentioned in the MP by the FME
Dr. Rajiv ICFRE		Suggested following addtitions undet Principle 7		
	12	C 7.4 - The FME shall also include a change matrix of all resources	It might be different to implement as all the FME might not have adequate resources to undertake it.	add a note - keeping in view that the change in resource matrix will be noted as per change in the MP at the assigned time

	13	C 7.5 - The FME shall undertake the inventory of regeneration on periodic manner	accepted and modified	
		Criterion 8.1: The FME shall strive towards sound economic performance as well as long term economic viability of operations, while taking into account the full environmental, social and operational costs of production, and ensuring the investments and practices necessary to maintain and improve the forest resources, and ecological productivity of the forests.		
Mr. A K Varma	13	In the last line interchange the words productivity and resources (forest productivity and ecological resources) as maintaining and improving forest productivity and ecological resources is key to sustainability).	accepted and modified the write up	as mentioned in the review_12.2.2016
Ms. Vishaish	14	Cultural benefits are missing plus some social benefits are no use benefits too Sacred groves etc Will these be respected??	this principle is under the theme dealing with the Economic factor .	as mentioned in the review_12.2.2016
Mr. Yash	15	How will these be ensured by an FME? - will depend on the strength of the indicators developed?	yes	as mentioned in the review_12.2.2016
		Criterion 8.3: The FME shall ensure that there is minimal damage to forest growing stock and other forest resources during forest management operations and shall minimize wastageduring harvesting, extraction and processing of forest resources. This would include post harvest waste, harvest residue and culling/removal of non commercial material from the forest		

Mr. Sudhir Pande	16	Too generic, subjective and and academic formulation. What objective tests will be applied to measure these parameters	yes they are generic. These tests will differe from case to case basis, depending o the MP . FME will take care of these and the judgement of the auditing agency is to verify the same	the verifier will cover these; keeping in view the objective of the theme is to maximise the economic output, the same will be specified at the I level (to maximise the economic output by minimising the waste and damage)
Dr. Rajiv ICFRE		Suggested following addtitions undet Principle 8		since this theme covers only economic aspect hence the eco and anthropogenic system is not covered here but in the subsequent themes
	17	C 8.4 - The FME shall list priority wise all ecosystem goods and services	will be covered in the theme dealing with env.	
	18	C 8.5 - The FME shall list all alternatives which leads to reduction of pressure on forests, specia;;y to address the degradation. This will facilitate REDD+	will be covered in the theme dealing with env.	
		Principle 9: Identification and use of Non-timber Forest services		
Ms. Vishaish	19	NTFP and ecological services should not be clubbed together	accepted ; removed and moved to P 7	as mentioned in the review_12.2.2016

		Criterion 9.1: Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds. Such activities shall be regulated, monitored and controlled by the FME, as per the prevailing legislative/regulatory requirements, and with regard to the ecological carrying capacity of the defined forest area.		
Mr. A K Varma	20	The word appropriate? Instead probably “required” may be used.	Required s a very limitig term. Forest Management services ehnce the value evenwhen they are not required but desirable	as mentioned in the review_12.2.2016
	21	could we add ‘Forest Ecosystem Services’ after watershed	modified; suggested we keep it as an open term	accepted and this will defined under glossary
	22	-should fisheries be deleted? In Indian context, it may seem to be ok... but let’s discuss	okay; can be kept on case to case basis (eg- game fishsing in mountain)	fisheries is tangible but doesn’t fall under the ecosystem serivices
		Criterion 9.2: The FME shall establish a written framework with guiding rules regarding extraction of NTFPs including rules related to nature and type of extraction, intensity and frequency of extraction and subsequent fallow periods. Records for the same shall be maintained and monitored by the FME.		it was decided to move this whole principle under P8
	23			
Mr. A K Varma	24	Will this written frame work be different from approved management plan? Could we redefine this sentence so as to remove above duality? It is suggested that we replace written frame work word with management plan/scheme	we have slightly modified it to "guidelines", which could be either a MP or any other activity program	
	25	also suggest adding enhancement of the resources after fallow periods.	enhancement of resources might not be doable by all the FMEs (eg- resin)	

	26	Are we including eco services as part of NWFP as is generally done and if so this criteria would run into difficulty for the FME and therefore it is suggested that we clarify in the standards that NWFP would include all non wood forest products being extracted/removed from the forests but would not include Forest Ecosystem Services products e.g. biodiversity, watershed, eco tourism, aesthetic, heritage, religious and cultural aspects and values.	defined in the next criteria
	27	Also by using the word Forest Ecosystem Services throughout NCCF Standards, we shall be emphasising on these values in a distinct and focussed manner towards the criterion of sustainability principles.	yes
		Criterion 9.3: The FME shall endeavor, wherever possible, to identify non-traditional forest services and resources, and attempt to monetize these services for attaining greater resource use efficiency of the forests. Such services would include, but not limited to, REDD+, Biodiversity offsets, Payments for Ecosystem Services etc.	
Mr. A K Varma	28	It is suggested to use Forest Ecosystem Services instead of non-traditional forest services	modified
	29	Should we bring in the word monetization? It might create unnecessary controversy with possibility of potential conflict towards sustainability principles. So we may replace it with the economic use and benefit without subverting sustainability principles for attaining greater resource use efficiency of the forests.	TBD(wherever possible the FME can attempt to but not necessary)
Ms. Vishaish	30	Non - Traditional forest services - What does this mean??	write up modified

Dr. Rajiv Pandey		Suggested addition under P 9		
ICFRE	31	The FME shall explore and scrutinise the possibility of local industry based on raw materials from forest resources	1. economic viability of FME as an enterprise whether other could do or not is not FME Concern. 2. Since this standard is not restricted to govt forest alone hence such imitations will be self-defeating	as mentioned in the review_12.2.2016
	32	Can we add grasses under inventory?		yes at I level we can cover this
	33	can we mention alternatives in nearby areas of forests which leads to reduction in pressure on forests?	flagged	yes we should , can be mentioned in all the themes

Note	1	Replace NTFPs with NWFP

Date	30.1.2016 delhi			
Stakeholder		Comments	REVIEW_12.2.2016	Review_20.2.2016
		Background		
Mr. A K Varma	1	Include concessions and privileges after rights in the first line as well as everywhere in this principle regarding local communities as in India many concessions and privileges are also granted to them.		accepted
	2	BUT THIS NEEDS TO BE DISCUSSED AND RELOOKED BY THE GROUP AS RIGHTS, CONCESSIONS AND PRIVILEGES (WITHOUT DUTIES AND RESPONSIBILITIES) ON FOREST PRODUCT HAVE ONLY RESULTED IN DEGRADATION OF FORESTS IN INDIA		accepted
	3	moves straight to compensation as the management mechanism?	compensation used in case there is loss of any property or resources. It is not necessary that these rights are given under FRA. For TOF/Plantations , rights are not under FRA but under traditionally accepted customs.	as mentioned in the review_12.2.2016
Ms. Vishaish	4	How will this be decided and by whom? The word 'compensation' should not be used. Rights given under FRA cannot be compensated or modified or extinguished.	However suggestions are welcomed for improvement and will be incorporated	as mentioned in the review_12.2.2016
	5	Again No mention of FPIC, agreements etc etc	accepted and modified	as mentioned in the review_12.2.2016

		Principle 10: Community Relations and workers rights – Forest management operations shall recognize the rights of local communities, forest dwellers and indigenous people and workers as well as maintain or enhance their long term social and economic well being.		
Ms. Vishaish	6	Local communities, tribals, forest dwellers etc should be treated separate from workers. Though the same might be workers too.	we have considered the same at many points and it is not possible to separate the two	at I level we may separate
Mr. Yash	7	Not able to understand how what is being proposed will not be a violation of some of the existing safeguards both environmental and social... Particularly in the cases mentioned of negative impacts on legal/property/livelihood/resource issues. For instance Criterion 10.3 talks about compensation for loss/ negative impact of forest management, however many actions that would lead to such losses/ impact would themselves be a violation of law, there should be no question of compensation in such scenarios - rather it should talk about legal proceedings to deal with such violations.	compensation is not at the cost of existing legal measures. This is regarding compensation when any law existing against the outside of the present legal framework or will be solved in local manner. For eg- damage to standing crop of a farm due to felling in neighbouring farm field, this principle would address such compensation also. all issues need not be pertaining to govet forest alone	
		Criterion 10.1: The FME shall identify and provide the forest dwellers and neighboring coMMUNITIES WITH OPPORTUNITIES FOR EMPLOYEMENT , TRAINING AND OTHER SOCIAL SERVICES		
Ms. Rebecca	8	write up - local employment	accepted and mofied	accepted and mofied

		Criterion 10.2: The FME shall support and promote efforts by foresters, state, central and state agencies, state or local groups, professional societies, conservation organizations, community groups, labour, universities, extension agencies etc. to apply principles of sustainable forest management. FME with forest management responsibilities on public lands shall confer with affected forest dwellers with respect to sustainable forest management practices.		
	9	include tribals and neighbouring forest dependent communities also along with forest dwellers,	accepted & modified	accepted & modified
Mr. A K Varma	10	First part needs to be discussed and reframed as there may be different perspective, some time at cross purposes, of different groups for sustainable management of forests e.g. some NGOs are against forest tribals still living in PAs and they would like them to be relocated; some NGO groups would like even removal of allowable cuts to be stopped (Sirsi example); Some NGOs want certain spp. to be banned etc (e.g. Eucalyptus)	this criterion talks about supporting and promoting efforts . It is not binding on FME for acceptance unless they are congruent with the basic principle of standard	as mentioned in the review_12.2.2016
		Criterion 10.3: In the case that the forest management results in loss of or negative impacts on the legal right, property, resources, or livelihood of local residents, they shall be consulted with and fairly compensated using appropriate mechanisms established beforehand.		
Ms. Vishaish	11	How will loss be decided and by whom? This goes against existing laws of the country - FRA, PESA and even WLPA	refer to Mr.Yash Comments	add in the write up - mechanism through mutually consent
	12	Local Residents - New terminology?? Who are now local residents??	accepted & modified	as mentioned in the review_12.2.2016

Mr. Sudhir Pande	13	Who will determine the extent of negative impact and quantify it monetary terms? Providing compensation may not be easy under the extant budgetary protocols and will require creation of SPVs for expeditious settlement of claims. Fixing responsibility for negative impacts qua the FME will be a contentious issue beyond the domain of the FME.	Not agreed; there is a mechanism existing in all certification schemes. Even protocol for quantification of negative impact compensation exist with govt forest mechanism (wildlife etc) . In private if they are not existing, they need to be created . This cannot go ignored	as mentioned in the review_12.2.2016
		Criterion 10.4: The FME shall recognize and respect the rights of forest dwellers.		
Ms. Rebecca	14	The FME is required to identify negative impacts from operations on communities and individuals.	wherever possible they may be pre identified, otherwise consulted on case to case basis.	as mentioned in the review_12.2.2016
	15	The FME is required to address grievances and provide fair compensation for negative impacts of operations on local communities.	modified	as mentioned in the review_12.2.2016
	16	The FME is required to assess potential impacts on communities and individuals, including impacts on food security and water availability, prior to any significant intensification or expansion of cultivation or infrastructure.	modified	as mentioned in the review_12.2.2016
	17	Forest managers are required to regularly monitor their impacts on the local economy and to adapt management as necessary for improvement.	modified	as mentioned in the review_12.2.2016

		Criterion 10.5: Sites of special cultural, ecological, economic or religious significance to indigenous people/local communities shall be clearly identified in cooperation with such people, and recognized and protected by forest managers		
Mr. A K Varma	18	Include heritage also.	modified	as mentioned in the review_12.2.2016
Ms. Vishaish	19	Why by managers and not by community itself, for whom the site is of importance?	the community may be involved In protection management but ultimately the ownership of protection will lie with the FME	as mentioned in the review_12.2.2016. also this will be done by social consultation also
		Criterion 10.6: Forest dwellers shall be acknowledged and compensated for the application of their traditional Knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free, prior and informed consent before forest operations commence.		
			Can discuss; It is only where application	

Mr. A K Varma	20	needs discussion and clarification as to what is meant by the whole criteria... as there would be many pitfalls in actual application of this criteria for traditional knowledge of the forest dwellers , being a community driven thing will be difficult to be pin-pointed to a particular individual or community and consequently compensated and may result in long drawn wrangling and delay forest operations. Also we have to see as to whether this criterion as proposed now fits into the client's willingness to go for it due to above reasons, as traditional knowledge cannot be claimed to be a matter of copy right. Also we have to see PEFC requirements.		the same has been modified under P 10.7. Also the write up for the same will be changes
Mr. Yash	21	seems to be overlooking the provisions of the Biodiversity Act.	clarification required	it is already mandatory under the Biodiversity act
Mr. Vishaish	22	Traditional Knowledge use should also be based on FPIC	modified and taken care of.	as mentioned in the review_12.2.2016
Dr. Rajiv ICFRE		Suggested addition under P 10		
	23	C 10.7 - The FME shall develop social safeguards	modified	as mentioned in the review_12.2.2016
	24	C 10.8 - The FME shall document the traditional knowledge	modified	as mentioned in the review_12.2.2016
		Principle 11: Workers rights – including permanent, temporary and contract workers at all levels		

		Criterion 11.1: Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.		
Mr. A K Varma	25	Add Enterprise after forest management	FME, Contractors and all people associated with the management activity	as mentioned in the review_12.2.2016
Ms. Rebecca	26	safety of employees -- including grievance redressal related to working conditions and provision of compensation for occupational injuries. Also Ensure that wages, working hours and leave comply with, or exceed, applicable legislation and sector minimum standards.	there are existing and applicable laws for this, however It will be further ddevelop at the I level. All existing povisions will be honoured. Since most of the forest operations are undertaken on a contractual basis , this might need to be worked put specifically SMS are user defined, factories and establishemnet have individual acts . any clarity is welcomed	as per the applicable law
		Criterion 11.2: The rights of workers to organise and voluntarily negotiate with their employers shall be guaranteed as Outlined in Conventions 87 and 98 of the International Labour Organization (ILO).		
Ms. Rebecca	27	should respect the core ILO rights of workers as defined in the Declaration on Fundamental Principles & Rights at Work (1998)	clarification required	as per the applicable laws agreed by India or to which India is a signatory (same will be edited in

				the write up and specified at I level)
		Criterion 11.3: Written guidelines shall exist for recruitment, promotion, dismissal, remuneration and benefits for permanent, temporary and contract workers, and the FME shall not discriminate among employees on the basis on caste, religion, gender, sex, age etc.		
Ms. Rebecca	28	Respect workers' freedom of association and right to collective bargaining.	acceptd and odified	Refer C 11.2
	29	Ensure workers are adequately equipped, instructed and trained for their tasks, including sage use and handling of chemicals.		11.5 Refer C 11.5

Note	1	replace the positionof rights and commmunity relations in the Theme Title
	2	changes in the write up of P 10

Theme F				
Date	30.1.2016	delhi		
Stakeholder		Comments	REVIEW_12.2.2016	Review_20.2.2016
		Title		

Mr. A K Varma	1	What do we mean by ecological health? Any alternative; substitute?	TBD	forest health and the ecological integrity
		Principle 12: Biodiversity and Natural Resource Management – Conservation, Enhancement and Rehabilitation		
Mr. A K Varma	2	Add Ecology after Biodiversity	accepted and added	ecology first then biodiversity
		Criterion 12.1: The FME shall have written guidelines for the maintenance, conservation and enhancement of biological diversity (ecosystem/landscape/species/genetic diversity) within the forest areas in a manner to enhance the stability, vitality and resistance capacity of the forest tract to adverse environmental factors, and strengthen the natural regulation mechanisms.		
Mr. A K Varma	3	The sentence after biological diversity is suggested to be removed and the phrase and strengthen the natural regulation mechanisms could be inserted after this as the opening sentence of these criteria covers the intent of the principle adequately and succinctly. The elaborations in the subsequent sentence could come in the indicators.		
		So this criterion may read like this		
		The FME shall have written guidelines for the maintenance, conservation and enhancement of biological diversity and strengthen the natural	acceptd and modified	acceptd and modified

		regulation mechanisms.		
Mr. Vishaish	4	What is meant by 'natural regulation mechanisms'?	referring to ecological mechanism to regenerate and regulate ecosystem activity to a natural mean	accepted and modified
				slight changes in the write up of the 12.1
		Criterion 12.2: The FME shall consider the impacts of its forest management activities on the forest's ecological conditions and undertake measures for the restoration and rehabilitation of degraded forests, if any, arising as a result of management activities.		
Mr. A K Varma	5	Add Biodiversity before ecological		accepted and modified
	6	Delete the word if any	retain in original form	
	7	Replace degraded forests with any degradation in the ecological function and biodiversity of forests	accepted'	accepted and modified - write up change as degradation of forest and loss of biodiversity
Mr. Yash	8	The need for restoration and rehabilitation of degraded forests as described under Criterion 12.2 must not be allowed to arise in the first place	yes we agree if something arises.	as mentioned in the review_12.2.2016

		Criterion 12.3: The FME shall undertake efforts to minimize the use of chemicals to achieve management objectives while protecting employees, neighboring properties, the public and the environment, including wildlife and aquatic habitats. The use of chemicals shall be strictly controlled and the environmental impacts caused, shall be minimized accordingly.		
Mr. A K Varma	9	Add hazardous before chemicals because we are more concerned with that	all chemicals. We want to go for zero chemical tolerance ,aslo hazardous is already covered under laws and acts	as mentioned in the review_12.2.2016; also write up modified
		Criterion 12.4: The use of biological control agents shall be documented, minimized, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols.		
Mr. A K Varma	10	To inform members with contextual reference... what are the current national and international thinking/protocol on adoption of bio logical control agents as the overall impression that comes out of the last sentence is that some strict control measures are needed to be applied for bio –control measures for pest control and what if national laws are different from internationally accepted scientific protocols in few cases if any?	modified	as mentioned in the review_12.2.2016

		Criterion 12.5: The FME shall not use any genetically modified organisms unless expressed permission for the same is obtained from the Government of India		
Mr. Yash	11	But Criterion 5.8 says that the "use of GMOs will be prohibited".	modified	as mentioned in the review_12.2.2016
		Criterion 12.6: Before introduction of exotic species, the FME shall assess the ecological impacts of their introduction, and their propagation shall be strictly controlled. Care shall be taken that invasive exotics are not introduced into the forests, prior to establishment of strict controls.		
Mr. Vishaish	12	This should be avoided and again with FPIC of local communities	not always possible, most of the commercial plabtation and timber is presentaly in india are exotic eg eucalyptus, sababul etc. so avoiding is not always a solution esply is alternatives are not availabe. Further FPC might not always be possible where exotics are being utilised for production forests	as mentioned in the review_12.2.2016

		The same should apply for chemicals and biological control agents		
Mr. Yash	13	Introduction of exotic species should be prohibited altogether.	repeat	as mentioned in the review_12.2.2016
		Criterion 12.7: The FME shall not change the land use pattern of any 'natural forest/legally classified forest area', to a non forestry land use, other than as per the specific provisions of the law . Further, the FME shall not convert any primary forests to forest monoculture plantations, nor shall it convert any threatened forest ecosystem, culturally and socially significant area, or an important habitat of threatened species to a non-forestry land use.		
		This may be modified as below		
Mr. A K Varma	14	The FME shall not change the land use pattern of any 'natural forest/legally classified forest area', any threatened forest ecosystem, culturally and socially significant area, or an important habitat of threatened species to a non-forestry land use and shall not convert any primary forests to forest monoculture plantations, other than as per the specific provisions of the law.	suggested to retain in original form	as mentioned in the review_12.2.2016; also the safeguards and classifications will be further developed at I level, also a cut off date/limit has been included at I level, and HCV & Threatened forest ecosystems needs

				to be added in the write up and conditions in form of verifiers for revival of the high degraded primary forests
		Note .There is a likelihood of a conflict between 12.7 and principal 13 as probably area under later would be a completely no go area? Whereas 12.7 provides for legal go. Thus it would be good if qualitative distinction is made in the area falling under 12.7 and those in 13 while defining/assigning attributes of HCV forests which have to be at the apex as far conservation values are concerned.(See also 13 below)	TBS, however P13 is not a no go area , but only intensive conservation management areas	as above
Mr. Sudhir Pande	15	This is statutorily prohibited under the Forest (Conservation) Act, 1980 and the country has also promulgated Biodiversity Act 2002 to regulate conservation and use of biodiversity.	conversions are protected under FCRA 1980	covered as per provisions

Ms. Rebecca	16	this condition should be removed.		given the increasing demand of the country and degraded area if left unmaintained is going to add no value to the environment-economically, socially and environmentally hence this P Is needed to lay out conditions for restoration of area
Ms. Vishaish	17	Not just non-forestry but also not into plantations or any commercial use		
		Principle 13: Identification, Protection and Management of Special Sites/High Conservation Value Forests		
		Criterion 13.1: The FME shall identify and classify the High Conservation Values (HCV) attributes/special sites for conservation in the Forest Management Unit, appropriate to the scale and intensity of forest management, and manage them in a manner appropriate for their unique features.		

Mr. A K Varma	18	There are lots of landscape commonalities, yet there are critical differences in Principle 12 and 13 and they need to be ironed / worked out/ e.g. both the principles talk about special sites; further since HCV Forest will also cover, unique, endangered and threatened bio diversity of a forest they may have to be distinguished from the general biodiversity of a forest as it appears in the Principle 12.	TBD	
	19	Thus HCV and may be special sites have to be defined. Also they have to be identified as per a tool kit .Should it be as per WWF tool –kit or any other internationally accepted tool kit/ or should we modify above with reference to Indian Forestry conditions/policy?		
Ms, Rebecca	20	Forest managers are required to identify biodiversity values, potentially affected by operations, in as well as outside the FMU.	will be covered at I level	will be covered at I level
		Producers are required to take measures to minimise and mitigate negative impacts from operations on biodiversity values.	will be covered at I level	
Ms. Vishaish	21	Who decides these?	TBD; at the discretion of the auditor	
		Criterion 13.2: The identification of such attributes and areas shall be through a formal process of consultation, which shall be documented. The consultation process must place emphasis on the identification of conservation attributes, and options for the maintenance thereof.		

	22	this is needs more rigour /detail	at I level	
		Criterion 13.3: The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.		
Ms. Vishaish	23	Why just the summary?	1. the details measures might be very elaborate. 2. it might have confidential, propeirty information. 3. it might not be possible for small FMY to put out detailed conservation program in a public latform	
		Criterion 13.4: Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.		
Ms. Rebecca	24	Based on this regular monitoring of impacts, forest managers are required to adapt management as necessary for improvement.	accepted & modified	

		Criterion 13.5: The FME shall identify and protect any non-forested wetlands and its constituent elements, which are found associated with the forest tract (associated as found within the forest area, found upstream, or found downstream).		
Ms. A K Varma	25	non –forested wetlands? Does it mean wet land outside the forest area? Hence it may have to be re phrased to give clarity to this criterion. I also think the purpose of these criteria would be better served if we include the word water bodies / wetlands.	associated with forest tract	
		Also to delete repeated use of found	accepted & modified	
Ms. Vishaish	26	What about grasslands?	TBD	accepted and included
		Principle 14: Ecosystem services – identifying, quantifying and monetizing both tangible and non-tangible ecosystem services		
	27	Should be called Forest Ecosystem services as we are dealing with these services being provided by the forests in this principle.	accepted & modified	
Mr. A K Varma	28	Also monetisation should be replaced by Economic Value as the later is accepted terminology.	accepted & modified	

		Criterion 14.1: The FME shall identify all ecosystem services and functions associated with the forest tract, including, among others, forest regeneration and succession, genetic, species and ecosystem diversity, ecosystem processes, conditions and productivity, protection from soil erosion, protection of water resources and protection from adverse water impacts like floods, drought etc..		
Mr. A K Varma	29	Consider deleting forest regeneration and succession, genetic, species, conditions and productivity, and rephrasing the entire 14.1 as follows		
	30	The FME shall identify all ecosystem services and functions associated with the forest tract, including, among others the regulation of water regimes by intercepting rainfall and regulating its flow through the hydrological system; the maintenance of soil quality and the provision of organic materials through leaf and branch fall; the limiting of erosion and protection of soil from the direct impact of rainfall, modulating climate; and being key components of biodiversity both in themselves and as a habitat for other species.	will be covered at I level	
		Criterion 14.2: The FME shall categorize the forest services based on their nature as provisioning services, regulatory services, cultural services or supporting services, and identify threats to the functioning of these services along with measures required to neutralize such threats.		
Mr. A K Varma	31	use socio culture instead of cultural (2nd line)	this term here denote spiritual, asthetic and educational services	

		Criterion 14.3: The FME shall have in place written guidelines for protection of soil and water resources, and put in place appropriate soil and moisture conservation measures to maintain and enhance the soil characteristics. Further, measures to control soil erosion, run off etc. shall also be established, including, but not restricted to, stream buffer zones, road and drainage construction guidelines, slope harvest guidelines etc.		
Mr. A K Varma	32	is to be rephrased as below		
		The FME shall have in place written guidelines for protection of soil and water resources (including but not restricted to stream buffer zones), road and drainage construction, slope etc. and put in place appropriate soil and moisture conservation measures to control soil erosion and run off.	TBD	
Ms. Rebecca	33	enhance soil characteristics and quality of surface and ground water	accepted and modified	
		Criterion 14.4: Wherever possible, the FME shall attempt to quantify the ecosystem services provided by the forest tract in monetary terms, and measure the associated risks as well as threat mitigation measures in the same monetary terms, to arrive at a valuation of the ecosystem service. These valuations can be further utilized to monetize ecosystem services wherever possible, as well as to establish a 'reward/punish' mechanism for forest management operations which		

		contribute respectively to enhancement/degradation of forest ecosystem services.		
Mr. A K Varma	34	To be rephrased as follows		
		Wherever possible, the FME shall attempt to estimate the economic value of the ecosystem services provided by the forest along with the costs of the associated risks and mitigation measures in order to indicate relative importance of these services.	TBD	
		Criterion 15.3: The FME shall attempt to measure the biodiversity levels of the forest tract by use of various biodiversity indices. Further, the FME shall assess the predicted impact on biodiversity due to forest management operations and offset biodiversity losses, on the basis of severity of impact, by utilization of the following offset hierarchy viz.,		
		a) Avoidance of impact		
		b) Minimization of impact		
		c) Restoration/Rehabilitation of biodiversity attributes		
		d) Offsetting of biodiversity impacts by <i>ex situ</i> conservation, forest enrichment etc.		
		e) Additional Conservation Actions		

WWF	35	seems loose. what is FSC standard on this?	No specific mention in FSC	
	36	Sudhir Pande: This would be difficult to implement until and unless the FMEs are strengthened with qualified personnel	YES	the C are broad level while this issue will be dealt at the I level which will be specific in nature
Dr. Rajiv ICFRE		Suggested addition under P15		
	37	The FME shall accounts the details of algal and lichens in the existing ecosystems	at I level	

Stage - Public Consultation

Stakeholder	S.No.	General Comment	Review
Dr. P. V. Somashekar		Forest management certification is very much essential to conserve the forests. It should be strictly monitored certification. I have some queries:	
IWST	1	Is this certification can be given for private plantation.	Yes. It will cover the Private Plantations as well.
	2	IWST is encouraging the farmers and enterprenurs to sandalwood plantations., cn it be given certification? If so, what methods has to be followed?	Yes it can be given to farmers and plantation owners . The applicant will be apply for the certification to NCCF or the accredited CBs for the initiation. The process will be defined and available on NCCF website once the standard is ready
	3	If it is certified then the farmers and enterpernurs can sell the wood to open market or can they export?	Yes. As per the applicable norms
	4	IWST is giving lot of modedls in Sandalwood plantations. Sandalwood is a root parasite, it requires host plants, since, we aresuggesting to plant Casuvina, D. patfolia, Red Sandus, M. dutriya. Do you certify these species also? If so, can the farmers and enterprenurs export the wood with your certification?	Yes
	5	Farmers also planting the sandalwood with horticulture spp. Like gooseberry, mango, guvava, jamuns, pomegranate etc., can these plantations also get certified?	Yes the timber will be certified
Dr. Syam Viswanathg		Under Principle 6. Forests and Climate Change, one more criterion as 6.1.4 may be added as:	

Scientist F, IWST		" The FME shall also endeavour to adopt Sustainable land management activities that could be considered as carbon outreach or even better carbon negative processes like incorporation of 'biochar' (..... > 40% C and will remain in soil..... 1000 years) in plantation input management programmes especially in degraded soil environment.	cannot be specific. The same will be part of the MP of the different states
		Biochar is being considered world wide as an important carbon sequestration method/ activity to mitigate climate change. Hence in this Theme 6 atleast a mention should be made of it. Biochar is also a by product of gasification process for electricity generation and there could no further better use of this by product if it goes back to sequestrate carbon in soils.	
Ms. Suchitra Sahoo	1	Biodiversity mapping of all areas being considered for certification needs to be carried out in detail.	The comments are generic in nature and more of observational nature . The aspects have been covered in Standard.
Wild Orissa			
	2	Valuation of biodiversity needs to be arrived based on contemporary best practice.	
	3	Existence of wildlife corridors need to be documented.	
	4	Wild Orissa (www.wildorissa.org) findings have revealed that rich biodiversity exists in most areas outside the protected areas network also like Munduli-Naraja Conservation of water fowl.	
	5	Our focus is on plantation of trees which is more helpful for biodiversity.	
Ms. Appayani Mishra	1	While the loss of individual species catches our attention, it is degradation and loss of forests, wetlands that poses the gravest threat to diversity (biological).	
Wild Orissa			

	2	As representing my organization WILD ORISSA, it would be very much honored to include and protect all the species (plants as well as animals).	
	3	we can save the ecosystem and with them the species we value.	
	4	casually, respecting, preserving and maintaining traditional knowledge of the sustainable use of biological diversity with the involvement of indigenous peoples and local communities.	
Mr. Hemanta Kumar Sahoo	1	As per FRA 2006, Amendment rule 2012, Gramsabha is the authority over community forest resources. Gramsabha or right holders are empowered to manage the forest as per Sect 5 of the act NCCF as an outsider to set management plan, activities is simply violator of FRA.	NCCF is a standard setting body the exercise of certification is voluntary. It will not set any management plan but will assess the one already set by the owners as per the C & I
Vasundhara			
	2	As NCCF is targeting forest products, the alternate target group is forest dependent communities. Who all are managing their forest areas as per their own local practical knowledge. Is it possible for them to go through the condition applied as per principle-3?	Yes. With the help of the Owner (FDs / Corporates)
	3	As you are interested in sustainable harvest of particular product, how could you set sustainable harvest limit of the particular product to the given area.	It will be part of the Management plan
	4	If the certification will renew each year who will do the assessment of all the criteria?	certification bodies
	5	Who will fund Gramsabha to prepare all documents of NCCF required for certification?	owners of land or the certification entity

	6	Do suggest some other simple criteria for the forest dependent marginalized people who all will get benefited by setting non timber forest products like fruits, leaves, fibres etc. to get income out of it.	it is addressed in standard
Mr. Bijoy Prasad Ratho	1	Standards developed should be internationally acceptable - international agencies to be involved.	Yes. PEFC Endorsement will be sought
J K Paper Ltd			
	2	Standards at some time should be "Indianized" to ensure that they are practically implementable and are to be seen in local context instead of just borrowing from international standards.	The NCCF standards are the Nationalised version
	3	Separate standards may be developed for private forestry/TOF to ensure that they are also to get the benefits of certification, particularly small and marginal holders/farmers and the uniqueness of dealing with farmers - land tenure, health and safety guidelines, etc.	Yes. ToF, NWFP certification standards development is in process
Mr. P. K. J. Mohapatra	1	This is a good start, keep it up.	noted
	2	when the scheme gets accepted and matures, think of trading of certificates in the international market, similar to PAT (Perform, Achieve, and Trade) policy being implemental in India's energy sector.	noted
	3	Models should be developed to examine the rationality of factors considered in the decision of "questionnaires".	not in scope of FM standard
Mr. O.P. Singh	1	What manpower do you have at your disposal? What is the expertise and qualification of the persons who will be involved in the certification of forests?	NCCF will set up the training and experience requirements for the Auditor for its scheme

CCF , Odisha			
	2	Why can't NCCF, comprising reputed forest officers, share the criteria indicators with the current forest officers who have the legal responsibility of managing the forest on sustainable basis?	It is in public domain. The certification process takes into consideration of same
	3	Do you have any case study where a forest block has been declared as not sustainably managed ? Please share the case study.	not within the scope of FM Standard consultation but will share during the sensitisation workshops
	4	What unit of forests is considered for certification? Is it forest block/ forest division / wildlife sanctuary/ national park?	Entity level
	5	In what way, auditors of NCCF are more competent or different from AG auditors? (Forest Department works are audited by AG, Odisha)	They will be trained in certification scheme. The retired officers can also be on panel auditors post complying to the training and experience requirements
Mr. M. Gourinath	1	Standardize forest managemnt unit	Noted
Retired IFS Officer			
	2	Only rights and concessions are highlighted. The duties are also to be mentioned for forest dwellers.	noted

	3	What is the manpower for such a magnitude of certification and assessment job of all forests in India.	The manpower will be calculated as per the area of certification requirement
			It is part of it in Theme B
	4	The certification will be easy if working plans are co-opted into the NCCF for certification.	
S N Patro	1	in the NCCF programme, adequate space must be given to cultural aspects.	It is addressed in standard
President, Orissa Environmental Society			
	2	While deciding management certification standards, carbon dioxide/ GHG sequestration audit of the ecosystem must be an important obligation.	not within scope of NCCF FM Standard
	3	Forest certification may have a tilt towards man-made forest, degraded forests, poda-affected forest, compared to natural forests having naturalness and carrying capacity in respect of biodiversity and wildlife.	observation
	4	IUCN Red listed species and generate species need not ordinarily come under the scope of certification.	observation
	5	NCCF is a welcome programme, but must take the above factors into consideration. There should be periodical assessment of its success and scope of revision from time to time.	It is part of the whole scheme. The standard revision and continual improvement
	6	Most of the schemes suffer from governance deficit syndrome. This has to be also taken into consideration and the appropriate strategy is to be thought of.	Observation

Mr. Nimish Shroff	1	The document talks about Forest Management Enterprise (FME) and how these FMEs will work towards sustainable and economic utilization of forest resources.	each FME will work upon implementation of the FMUs within it
Hon. General Secretary, ADMA			
	2	On pages 25 through 28, there is a long list of various positive measures like inventoru of forest resources (including NTFP/ medicinal plants), determination of quantum of material that can be sustaibaly harvested, etc. However, it does not describe creation of a new certification mecahnism for the produce per se. In my mind this is an important step. If the industry has to prefer purchase of sustainably harvested material, then first a certification system for such materail should exist in our country.	The NWFP certification Stanadard Deveelopment is in process
	3	The FMEs should aim to establish cost comparisons between conventionally harvested material (CHM) and sustainably harvested material (SHM). We hope that the cost of SHM will only be marginally higherthan the cost of CHM. If not, then the ASU industries will find it difficult to adhere to SHM only. In such a case, it might be worthwhile to propose some financial incentives for user industries who chiise to opt for SHMs over CHMs.	Observation
	4	There is a general note about integrating this standard with the prevailing regulations. We think most important of these would be the integration of this standard with Biological Diversity Act. The FMEs should work closely with BMCs as the BMCs have been given as very similar objective under the Act.	Observation

Mr. Amiya Parida	1	<p>From Odisha Forestry Sector Development Project, as I am in the position of Deputy Project Director (Livelihood Improvement) and dealing with last 7-8 years for implementation of Income Generation Activities (IGAS) through the Self Help Groups, these SHGs have been organised into different 70 commodity clusters in about 11 forest divisions up scaling NTFP ,Horticultural and agricultural produces. They deal with about 10-12 such products like de-seeded tamarind cake, Hill brooms, turmeric powders, ginger and onion cultivation, Agarbati, Mohua flower business etc. These cluster are always trying to how to upscale their product standards to fetch good income. Therefore they go for value addition in the products at different level, such as processing, branding, packaging, positioning of their products in the markets etc.</p>	<p>Certification is a voluntary exercise aimed towards the assessment and upliftment of the existing management practices within the entity including but not limited to economic, social and environmental aspects . The Standard has been devised taking into reference the existing work done by IIFM, working plan code of India and other significant document. Moreover we have the NWFP certification stanadrad development as a separate process and decisions will be taken ensuring that there is no overlap between the two in a way to make it difficult for the implmenetation</p>
	2	<p>Organic certification for the present time is one way to certify the produces that they are chemical fertiliser free, pesticide free and many more things free... and that why the product is Eco /environmental friendly, health friendly etc. So that the product fetch good price in the Market. So now we are trying to go for organic certification for all our dealt products in NTFP, Horti and Agri fields. As this certification is a popular one in the country and abroad also, under such circumstances we need to see the perspectives in both the certification process/ standards whether they overlap to each other or not.</p>	

	3	<p>When we talk about trees outside forest areas to be considered under forest certification, then the tree coverage under different species both forestry and non forestry grow in the non forest areas i.e in farm and other lands where it very much comes under the purview of the organic certification. It is suggested one must not be confused with the limitations of both the certification process. The perspectives of both the certification standards to be checked and verified/ examined to bring the line of demarcation among the two. This must be seen mostly NTFP and Horti/ Agri produces point of view.</p>
	4	<p>The organic certification for a product from a particular area/ farm is issued which valid for a certain period as my knowledge is concerned, then expire of that time period is further claims for renewal of certification on that particular product from that land/ area. Whether that required under forest certification is to be examined . Why this because, when we talk about the audit mechanism for forest certification, what will be the interval of audits so that the non compromised conditions verified in a particular period remains unchanged for that certain period.</p>
		<p>If there is possibility in change of that conditions within that period then how that can be determined. I think audit can not be possible to be undertaken in a continuous manner. so validity of certificate period to be decided</p>
	5	<p>Due to certification process who will be the lion share of the benefits. If it is the big business persons, then definitely the tree produces demand will be increased, sustainable harvesting will be difficult task, the forest mafia number may increase, even the local people may protest the extraction when the outsiders exploit the forest produces. There fore villagers around forest areas, their benefits, socio - cultural dependency on forest should not be disturbed/ adversely influenced by the forest certification.</p>

	1	At the outset, one may commend the effort made to devise a system for forest certification. However, it would be useful to consider how this will add to the (voluntary) schemes already in operation devised by the WWF and the IFC.
	2	In general, I have the apprehension that this type of comprehensive scheme will impose a crushing administrative burden on forest management entities in the country. As you well know, there is already a wide range of laws and monitoring agencies for forestry. Complying with these imposes a 24-hour burden and 18-hour workdays on our forest officials. But even the most stringent of the laws and monitoring agencies do not envisage as complete a coverage as the FC schemes under consideration.
	3	Therefore, I would earnestly request a sober look at who your clients are, and what purpose will be served. One has to be aware that once such a comprehensive scheme (which to my mind is beyond human capacities to satisfy) is written into any government directions or statute, then much of the forest department's activities will become highly questionable and vulnerable to challenge. I see such frameworks as representing the ultimate envelope of (perhaps) well-intentioned aspirations, but not a reasonable framework for action in practical circumstances.

	4	To sweeten this somewhat harsh judgement, may I suggest a series of graded levels, starting from a fairly simple certificate of legality, then proceeding by stages to more exacting requirements. One could think of different levels of sustainability, translated into basic, intermediate, advanced levels of certification, or say silver, gold, platinum, diamond, certificates. This will provide users some options, and also provide a less onerous learning curve.
	5	For this initial phase, I would suggest restricting the scheme to only PRODUCT certification, rather than trying to cover such a wide gamut of forest certification. Hence the scheme may be called the Forest PRODUCT Certification Scheme, rather than the Forest Cert Scheme. I had made this suggestion even in the proposal drawn up by the FSU Division during our time in the MoEF, as you may remember.
	6	I would urge more discussion with the forest service, who may be your main clients. I do not see how this scheme will add to their effectiveness, and I see many ways in which it will make their functioning more difficult. As an alternative, I would suggest tailoring schemes to more specific client groups. For example, one may start with a cert scheme narrowly tailored to farm forestry clients, or another tailored to corporate clients like paper mills that have forest (tree) plantations.
	7	Before proceeding, a review of the pilot projects undertaken by the IIFM in a few divisions in central India may be accessed, and feedback obtained from the forest officials associated with those pilots.

Mr. Sunil Nautiyal, ISEC	1	Please see page 10 principles 1: in my opinion the 'local laws' can be taken under principle 2, therefore the heading of principle no 1 and principal 2 may please be modified accordingly.	Both the principles address different issues hence this is not accepted.
	2	Theme F 'ecological integrity and health of forests – conservation and management' may be rephrased as "Ecosystem Sustainability - Conservation and management of Threatened and Sensitive Ecosystems".	Theme F goes beyond the threatened and sensitive ecosystems and talks about conservation and sustainable management of the overall environment including the threatened and sensitive ecosystems
	3	In the draft document there is a scope for highlighting the limitations of this document/act. What would be the procedure to overcome or deal the various issues are being listed under the limitations	Not clear
	4	There should be provision for proper monitoring of the programme under this act.	Yes there is annual surveillance audit system for monitoring
	5	As far as forest resource (timber) is concerned, still more than 270 million tones wood is harvested for fulfilling the domestic energy requirements. Therefore, there is a need to understand how the growing demand of timber industries at various levels will be fulfilled and how the resources will be procured. So scope is to look into demand and supply without compromising the forest ecosystems sustainability.	observation

	6	Many states have implemented forest corporation/certification act as indicated by you during the presentation. Now there is a need to understand the pros and cons of the corporation/cortication acts implemented and in place in many states (the lesson learnt and provision of addressing the ambiguities in the document under preparation)	Noted; case studies will be part of the workshops. Further impact of the standard on ground will be studies during the implementation of stanadrd on the ground
	7	For resource allocation and resource management the framework has to be developed for landscape characterization. Accordingly priority areas need to be indentified for the proper implementation for successful diffusion.	noted
	8	There should be scope for impact evaluation (Socio-economic and ecological)	It is addressed in standard
	9	Phytosociological attributes need to be followed towards understanding the vegetation dynamics.	noted
	10	TEK in conservation and management of Bio-resources needs to be documented properly. This has to be highlighted in the document.	noted
	11	Reason is specific Inventory of MPTs need to be prepared based the preference of local people/farmers and various stakeholders.	noted
	12	In the act the provision should be made for active participation of local people for achieving the desired goals.	it is integral part of the document
	13	Adequate number of field staff should be made available at field level towards achieving the goals of various themes.	That will be part of the entity MP

Mr. P C Mishra	1	No. of regeneration of seedlings, saplings and poles to be fixed for a unit of forest area for certification.	
Joint Project Director, OFSDP			
	2	No. of OR and UD cases of a particular forest area may be Division/circle/reason wise to know the type of protection and hence may be an indicator. Here it is to point out that more the cases, less is the attachment of the people of the nearby areas on forests.	
	3	No. of dry months of water in a well, pond, stream, river nearby the forests may be an indicator. It is to point out that if the water bodies said above are perennial, then there is well soil and moisture conservation in the forests done through different management processes.	
	4	Types of wild lives residing in the forests with their number may be taken as an indicator for the health of the forests and hence forests certification may be made accordingly.	
	5	No. of fire days/ rainy days/cold days in a year in locality surrounding forests may be fixed to be a indicator for forest certification.	

Mr. Gurumurthy Demlapura	1	Criterion 11.4: The use of biological control agents shall be within India's regulatory framework and documented, minimized, monitored and strictly controlled in accordance with internationally accepted scientific protocols. The FME shall maintain a precautionary approach towards the introduction and use of biological control agents. Use of genetically modified organisms shall be prohibited.	addressed in 11.4
		I am not sure if the references to "genetically modified" used in this document (Principle 11, Criterion 11.4) with regard to "use of biological control agents" applies to use of GM trees that could be "insect/disease tolerant".	No it will not
	2	Indicator 11.4.3: There shall be no use (defined as commercial use as well as for research purposes) of genetically modified organisms within the FMU.	
		"Indicator 11.4.3" prohibits use of GMOs even for research purposes. This seems to be a step ahead of even FSC which as I understand doesn't prohibit use of GMOs for research purposes.	Yes
		1. Welcomed the Forest Certification and endorsing the draft standard being developed by the NCCF.	Noted

<p>Lalthlamuana Pachau Conservator of Forests Central Circle : Aizawl Mizoram</p>	<p>2. Submitted the unique land tenure system in Mizoram that there are many private tree plantations raised by individuals in non-forest lands (unclassed forests) as well as in the reserved forests notified in 1870s by the then British Government and notified in 1965 and 1970 by the then Mizo District Council. This was due to the fact that several towns, sub-towns and villages were encompassed within the reserved forest so notified without inviting or settling the rights and privileges of the local people.</p> <p>3. The State Forest Department also raised many tree plantations in non-forest lands by obtaining NOC or Land Donation Certificate from the concerned Village Council authorities. Also there are several chunks/pockets of natural forests / community forests jointly protected by the local communities and the State Forest Department.</p> <p>4. It is submitted that all those Government and private plantations and community forests under such unique land holding system may be taken into consideration while finalizing the Forest Management Certification Standard.</p>	<p>Noted</p>
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Title:		General Comments	
Stakeholder	S.No.	Comment	Review

	1	Indicators continue to be framed like Criteria. The word 'shall' should not appear in an Indicator. Indicators should be precise and definitive in substantiating whether the corresponding criteria is being fulfilled. (please refer to FSC's guidance on developing indicators).	Noted PS going forward in the process taking into consideration the accreditation body inputs also, it was decided that the language of indicators will indicate the mandatory and suggestive nature of the components of the criteria
WWF			
	2	Definitions around terms like 'appropriate' or 'periodic' or 'regular' will need to be made clear to leave less room for subjectivity/interpretation when the Standard is implemented in practice. Perhaps can be addressed at the Verifier level?	Noted
	3	Where different Criteria relate to each other across Principles these will need to be cross-referenced.	will be done at the later implementation stage

Stakeholder	Comment	Review
	List of Laws reference documents comments	
	CORRECTIONS REQUIRED	

Varun Grover, IIFM Student	1. List of Laws: Tribal and Community Missing, Page 5 The Scheduled Tribes and Other Traditional Forest Dwellers (Recognition of Forest Rights) Act, 2006. This is not a forest conservation act, it is under the Ministry of Tribal of Affairs, Gol.	Laws and regulations are being updated at intervals. The same will be reflected in the revisions of the List of laws reference document of NCCF . Further this list is for reference of the auditors. Accepted and document will be modified accordingly
	2. Under the Forest Conservation Heading, Page 5 The Indian Forest Act, 1997 to be corrected as The Indian Forest Act 1927.	
	SUGGESTIONS	
	1. The Plant Variety Protection and Farmers' Rights (PVPFR): Act- 2001 (if it needs to be added)	
	2. Wetlands (Conservation and Management) Rules 2010	
	3. Working Plan Code 2004/2014 missing	
	4. No mention of Particularly vulnerable tribal group (PVTG), Tribal Sub-Plan	
	5. Joint Forest Management (http://rtmoef.nic.in/Docs/JFM_Booklet.pdf)	
	6. Mention about the Autonomous administrative divisions of India	
	7. The Guidelines on State Compensatory Afforestation Fund Management and Planning Authority (State CAMPA)	
	8. Green India Mission (Implementation Guidelines National Mission for a Green India)	
	9. National Afforestation Programme Revised Operational Guidelines – 2009	
	10. Mahatma Gandhi National Rural Employment Guarantee Act	
	11. Guidelines For Liberalizing Felling And Transit Regime for Tree Species Grown on Non-Forest/ Private Land	
12. The Wild Life (Protection) Amendment Bill, 2013		

13. Addendum 2014 To National Biodiversity Action Plan (NBAP) 2008	
14. National Air Quality Monitoring Programme (NAMP; manual monitoring system) (http://www.cpcb.nic.in/AQI_NAMP_Rep_June2015.pdf)	
15. FRA Amendment Rules 2012	
16. Additional guidelines for the ongoing Centrally Sponsored Scheme of Project Tiger relating to new components – reg. Protocol/Guidelines for Voluntary Village Relocation in Notified Core/Critical Tiger Habitats of Tiger Reserves	
17. Guidelines for Ecotourism in and Around Protected Areas, 2011	
18. The Child Labour (Prohibition And Regulation) Amendment Bill, 2016	
19. Satellite based Mining Surveillance System (MSS)	

Title:		Foreword	
Stakeholder	S.No.	Comment	Review
	1	THEME D: SUSTAINABLE AND ECONOMIC UTILIZATION OF FOREST RESOURCES	
	line 5	Other issues proposed to be addressed in this theme include optimal utilization of forest produce by minimizing wastage, use of local resources for value addition to benefit the local economy, establishment of written framework with guiding rules for sustainable extraction of NTFPs including guidelines related to nature and type of extraction, intensity and frequency of extraction and subsequent fallow periods etc.	accepted and modified

WWF			
	2	THEME E: SOCIALLY RESPONSIBLE FOREST MANAGEMENT - SOCIAL AND COMMUNITY RIGHTS AND RELATIONS	
	line 6	Further, training of forest workers in health and safety and use of safety equipment would be an integral part of this theme. Other issues addressed by the theme would include rights of workers to form unions and collectively bargain, no discrimination among workers on the basis of caste, religion, sex, age, no employment of children below 14 years of age etc.	
	comment	Should consider changing this to 'no negative discrimination', since there ought to be space for affirmative action in terms of involving women and marginalised sections more.	accepted and modified

Title:		Theme A	
Stakeholder	S.No.	Comment	Review
WWF	1	Principle 1: Compliance to national, state and local laws and international treaties and regulations	
		Criteria 1.1 : Indicator 1.1.2	

	The FME shall comply with legislation applicable to forest management issues including forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land and resource rights for indigenous people and forest dependent communities; health, labor and safety issues; and the payment of royalties and taxes.	
comment	Replace 'legislation' with the broader term 'laws' which also includes rules made by the executive and judiciary.	Accepted
2	Indicator 1.1.4: When violations occur, the FME acts promptly to correct and remediate the circumstances associated with the violation. The frequency and nature of regulatory violations, if indicative of widespread and systemic non-compliance, will have a bearing on the continued validity and renewal of the FME's certificate.	
comment	Phrasing dilutes the effectiveness of the intended deterrence - Consider replacing 'will have a bearing on the continued validity and renewal...' with 'shall render the FME liable for cancellation...'	Accepted
3	Criterion 1.2: Indicator 1.2.2	
	The FME shall demonstrate evidence that payments of taxes, royalties, and other charges are made in a timely manner. There should be no evidence of chronic non-payment.	

	As per the definition of 'should' at page 5, 'should' being interpreted as 'preferred but not necessarily required' would be counterproductive here - consider replacing with 'shall'?	As earlier discussed, the indicators revised without the shall and should terminology
4	Criterion 1.3:	
	Indicator 1.3.1: The FME shall comply with the intentions of the international agreements and conventions that India has ratified. Once ratified, all such agreements are enforced by means of legislation, and conformance to this indicator would be judged based on compliance to applicable laws.	
comment	For FME managers / technicians - awareness and understanding of domestic laws should also be reflected in the indicators here	accepted; indicator 1.3.3. added
5	Criterion 1.4:	
	Indicator 1.4.4: If any illegal or unauthorized activities are detected, the FME and its officers shall take appropriate measures, in accordance with law , to address them.	
comment	please add 'wherever warranted'	accepted and modified
6	Criterion 1.5:	
	Indicator 1.5.1: The FME shall make available written long term commitments to forest management practices consistent with the Principles and Criteria presented in this standard.	

comment	Please remove the use of the word 'shall' in all Indicators (1.5.1 to 1.5.4) across the Standard, 'shall' makes it read like a Criterion, not an Indicator.	As earlier discussed, the indicators revised without the shall and should terminology
7	Indicator 1.5.5: The FME shall have written commitments to comply with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, forest dwellers and tribals rights and occupational health and safety.	
comment	Since indicator 1.1.1 already obligates the FME to comply with 'all applicable laws', this requirement seems superfluous. Instead, this comprehensive list of topics on which compliances are mandated should be clubbed together with Indicator 1.1.1	accepted
8	Principle 2: Land Tenure, Rights and Responsibilities	
	Criterion 2.1: The FME managers shall demonstrate availability of clear, legally secure demonstrable evidence of long-term rights to the forest land (e.g. land title, customary rights, or lease agreements).	
comment	Replace 'demonstrate availability of' with the more clear 'have available'	modified at I level

9	Indicator 2.1.1: The FME shall demonstrate the availability of documentation for clear and legally secure land tenure and rights to the forest resource.	
comment	Replace 'demonstrate the availability of' with 'have available', for greater clarity and ease of enforcement	modified
10	Criterion 2.2: Indicator 2.2.2: When communities have delegated control of their rights or use in whole or in part (a) , this is to be (b) confirmed by documented agreements and/or interviews with representatives of local communities.	
comment (a)	Consider adding 'in a manner authorised by law' after 'or in part,' to ensure the legality of the delegation of powers/rights	modified
comment (b)	replace 'is to be' with 'is'	modified
11	Criterion 2.3: Appropriate/applicable mechanisms shall be employed to resolve disputes over tenure claims and rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. For all documented disputes, the steps/mechanisms engaged in dispute resolution shall also be documented.	
comment	Please change 'Appropriate/applicable' to 'Appropriate and legally applicable', for greater clarity and to ensure that illegal methods for settling disputes are not employed.	modified

	12	Criteria 2.3: Indicator 2.3.2: The FME shall record all such conflicts and their resolution , both to avoid further litigation, as well as to set precedents for similar conflicts in future.	
	comment	Replace 'their resolution' with 'the mode of resolution, and the outcome'.. for more comprehensive records of disputes	modified
	13	Indicator 2.3.3: The magnitude and severity of unresolved tenure claims and rights disputes are minor, relative to the scale of forest management operations.	
	comment	Please remove this indicator, since it gives the impression that unresolved tenure claims and rights are acceptable, as long as the 'magnitude and severity' is low.	Not accepted

Title:		Theme B	
Stakeholder	S.No.	Comment	Review
WWF	1	Principle 3: Development and implementation of a Management Plan/Working Plan	

	<p>Criterion 3.1: Appropriate to the scale, intensity and complexity of operations, there shall be a written management plan for the defined forest area that addresses the subjects and plan components enumerated in this criterion, as well as provisions for protection against forest</p> <p>NCCF National Forest Management Standard NCCF-STD-01 V1.0 (Draft 0) Page 15 fires, forest pests and diseases, illegal settlement and harvesting, safeguarding archaeological sites and others.</p>	
comment	Consider replacing 'defined forest area' with 'the forest area for which certification is sought' for greater clarity (since no forest area has been defined as such).	accepted & modified
comment	In order to ensure this provision is fully effective, the list at Criterion 3.1 (above) should be made indicative/inclusive, and not exhaustive (with room for elements which may be required by various stakeholders)	accepted
2	Criteria 3.2 : Indicator 3.2.4	
	When the work needs to be contracted out, the FME shall ensure that the contractors are also aware of the requirements of the management plan specific to their area of operations. Wherever necessary, the FME shall use professional technicians to provide forest workers with necessary technical guidance for their field operations.	
comment	Consider replacing 'are also aware of' with 'comply with' to enhance the efficacy of the provision?	accepted & modified

3	Criteria 3.3: Indicator 3.3.3	
	The process of consultation with stakeholders is through free, prior and informed consent (FPIC) and is documented, both at plan preparation stage as well as during implementation and monitoring stages.	
comment	Replace 'is through' with 'is based on'	modified
4	Principle 4: Monitoring, Assessment and Review of management plan and its implementation	
	Criterion 4.1: Appropriate to the scale and intensity of operations, forest management should include the research and data collection needed to monitor, at a minimum, the following indicators	
comment	Replace 'should' with 'shall' at Criterion 4.1	modified
5	Indicator 4.1.3: The FME shall demonstrate a commitment to acquiring information on key indicators pertaining to the environmental and socio-economic profiles of its operation.	

	Elaboration is required on what data would indicate the 'socio-economic profiles of its operation' to ensure better enforcement of Indicator 4.1.3.	
comment	Perhaps at the Verifier level?	accepted
6	Criterion 4.2: The health and vitality of forests shall be periodically monitored, especially key biotic and abiotic factors that potentially affect health and vitality of forest ecosystems, such as pests, diseases, overgrazing and overstocking, fire, and damage caused by climatic factors, air pollutants or by forest management operations.	
comment	There should also be a separate indicator here that makes the definition of "periodic" clear	
7	Indicator 4.2.2: The FME monitoring protocols shall include a periodic monitoring of these indicators, based on the scale, intensity and risk of operations, and development of a change matrix w.r.t. these indicators, so that appropriate remedial action may be undertaken whenever there is a threat to forest ecosystem health and stability.	
comment	Replace highlighted text in Indicator 4.2.2 with 'so that appropriate preventive and remedial action may be undertaken, in that order, whenever there is a threat to forest ecosystem health and stability'	modified

	8	Criterion 4.3: The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	
	comment	'should' or 'shall'?	modified
	9	Criterion 4.6: The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic conditions prevalent in the area. Any change in legal status of the land or change in rights should be documented in the management plan.	
	comment	Replace 'should' with 'shall'	modified

Title:		Theme C	
Stakeholder	S.No.	Comment	Review
WWF	1	Principle 5: Impacts OF Forest Management – Social, Economic and Environmental	

	<p>Criterion 5.1: The FME shall undertake social and environmental impact assessments to understand the impact of its management activities on the forest ecological environment, soil and water resources as well as on the local population in and around the forest management unit (FMU) or those dependent on the forest or forest resources for food, shelter or livelihood. This includes all direct or indirect management activities within the FMU undertaken by the FME or related to the present existence or functioning of the forest in its natural state.</p>	
comment	<p>Criterion 9.4 provides for the scope and manner of conducting social impact assessments, and Criterion 11.2 for environmental impact assessments - would be good to cross-reference them here.</p>	<p>Accepted; will be considered at implementation level or in auditor guidance note later</p>
2	<p>Indicator 5.1.1: The FME shall conduct an independent social and environmental impact assessment of its management activities on the local population in and around the forest management unit (FMU) or those dependent on the forest or forest resources for food, shelter or livelihood. This assessment shall be based on the scale, intensity and risk from forest management activities.</p>	
comment	<p>It may be useful to provide guidance here for the scope of the impact assessments? In India, SIAs are mandated under the Land Acquisition law, and EIAs under the EIA Notification. These two laws could be used as guides for the process and substance of these impact assessments.</p>	<p>accepted</p>

3	Criteria 5.3: Indicator 5.3.1: Effective measures shall be taken to minimize the damage to forest areas caused by such human activities as land preparation, afforestation, tending, forest harvesting, regeneration, road construction etc. so as to maintain the natural features of the soil and its long-time productivity in the forest.	
comment	Such damage to forest lands through activities mentioned here like forest harvesting, road preparation etc. should not be allowed to occur in the first place. Prevention should be the first preference.	5.3.1 modified accordingly
4	Criterion 6.3: Indicator 6.3.4: In case it is not possible to undertake any actions suitable to the SAPCC within the FMUs, the FME should endeavor to undertake actions, within or outside the FMUs, consistent with the provisions of the SAPCC by dovetailing its actions with the recommendations of the SAPCC or existing programs like Green India Mission (GIM) etc.	
comment	Recommend removing the highlighted portion of Indicator 6.3.4 because it dilutes the essence of the obligation by giving an exit option for not complying with the SAPCC.	Retained as it is

Title:		Theme D	
Stakeholder	S.No.	Comment	Review
WWF	1	Principle 7: Criterion 7.4: Indicator 7.4.1: The FME shall have documented guidelines for the extraction and removal of NTFPs in the management plan. The guidelines shall include those related to the nature of harvest/collection, fallow periods, safe levels of sustainable harvest and the intensity and frequency of harvest.	
	comment	this should be linked to data/findings/limits established through earlier Criteria	modified
	2	Principle 8: Criterion 8.1: The FME shall strive towards sound and long term economic viability of forest management operations, along with ensuring that the investments and practices necessary to maintain and improve the forest productivity are in place, while also accounting for the environmental, social and operational costs of production.	
	comment	replace 'environmental' with 'ecological'	modified

3	Indicator 8.1.1: The FME shall undertake a short, medium and long term budgeting of its activities to include all income as well as costs associated with the forest management operations. The financial viability of the enterprise should be clearly brought out in the economic model, at least in the long run, taking into account all social, environmental and operational costs.	
comment	Replace 'environmental' with 'ecological'	modified
4	Indicator 8.1.3: The FME shall undertake a periodic review of its management activities, including income generating activities as well as present and proposed investments, so that the economic sustainability of the FME is maintained in the long term.	
comment	Please reflect in the document somewhere that the 'periodic' timelines decided for reviews etc. should all match across the document.	to be done later at final review
5	Criterion 8.3: The FME shall ensure that there is minimal damage to forest growing stock and other forest resources (including water and soil resources and regeneration) during forest management operations and shall minimize wastage during harvesting, extraction and processing of forest resources. This would include post-harvest waste, harvest residue and culling/removal of non-commercial material from the forest.	

	comment	replace 'including' with 'limited to'	modified
	6	Indicators 8.4.2: The forest management activities are designed and implemented, spatially and temporarily, with due consideration to their impacts on these forest services. The FME engages in regular dialogue with stakeholders that are subject to impact from forest operations.	
	comment	Replace 'temporarily' with 'temporally'	modified

Title:		Theme E	
Stakeholder	S.No.	Comment	Review
WWF	1	Para 1: line 9	
		Further, this theme would also address the rights of local communities on the forest resource and compensation for use of their traditional knowledge after obtaining Free Prior and Informed Consent (FPIC), and redressal for any inadvertent negative impacts on the rights, property, resources, or livelihood of local residents after consultation and consent with the stakeholders.	
	comment	please add here 'redressal in accordance with legal mechanisms where they exist, and through consultation and consent with stakeholders where they do not'	modified

	Principle 9: Community rights and relations – Forest management operations shall recognize the rights of local communities, forest dwellers and indigenous people/tribals and shall as well as maintain and enhance their long term social and economic well-being.	
2		
comment	typing error ? please delete	modified
3	Criteria 9.6 : Indicator 9.6.4: The rights of indigenous/local communities to protect such sites shall be recognized and respected by the FME.	
comment	the wording of this Indicator currently is the same as the Criteria. Please revise so that it reads like an Indicator.	modified
4	Principle 10: Criteria 10.1: Indicator 10.1.1: The FME shall foster a safe working environment by: a. Complying with all relevant workplace health and safety legislation and regulations; b. Facilitating improvements in workplace health and safety; c. Adopting working conditions that do not endanger health or safety d. Consulting with forest workers and their representatives on workplace health and safety.	
comment	Replace 'legislation and regulations' with the wider term 'laws' which also includes executive and judge-made laws - besides legislations.	modified

5	Criterion 10.3: Written guidelines shall be prepared, in accordance with relevant Indian labor laws, rules and regulations, for recruitment, promotion, dismissal, remuneration and benefits for permanent, temporary and contract workers, and the FME shall not discriminate among employees on the basis on caste, religion, gender, age etc.	
comment	please add the word 'negatively' before 'discriminate'	modified
6	Indicator 10.3.2: The working hours, wage rates, salaries and benefits to be provided to the workers shall be clearly communicated to them and the FME shall have written documentation regarding their acquiescence to the same before the engagement of workers in field duties. In cases where NCCF National Forest Management Standard NCCF-STD-01 V1.0 (Draft 0) Page 34 such rights are not legally covered, the FME shall identify and put in place provisions as per prevailing industry best practices .	
comment	'prevailing industry practice' and 'best practice' contradict each other in this case.,. prevailing industry practice is not industry 'best practice'. please remove the word 'prevailing'	modified

	7	Indicator 10.3.3: The FME shall not discriminate among employees/workers on the basis of caste, religion, gender, age, region etc.	
	comment	please add 'negatively'	modified

Title:		Theme F	
Stakeholder	S.No.	Comment	Review
WWF	1	Principle 11: Criteria 11.1	
		Indicator 11.1.5: If it is not practically possible or feasible to clearly map the protected zones and biological corridors in an FMU, or in the surrounding landscape, then the FME shall ensure that an adequate area shall be kept for each forest type, keeping in mind general areas of occurrence and wildlife migration patterns in the forest.	
	comment	Does 'protected zones' refer to 'protected areas'? If so, there will be no 'protected zones' within an FME - please revise	modified

2	Criterion 11.2: The FME shall consider the impacts of its forest management activities on the forest biodiversity and ecological functions and undertake rehabilitation/restoration of ecological functions/values that may have been damaged/degraded due to past management activities.	
comment	please change 'forest' to 'forest areas'	modified
3	Indicator 11.2.1: The FME shall undertake independent environmental impact assessments in the FMUs, suitable to the scale, size and complexity of forest management operations, prior to planned operations and any major management interventions.	
comment	A participatory approach to environmental impact assessments should be incorporated, as has been provided for in Criterion 9.2 for social impact assessments (using the EIA Notification as guidance)	indicator added to address the same
4	Indicator 11.2.4: The FME shall ensure that measures are taken so that no/minimal damage to forests as a result of site disturbing activities like land preparation, tending, harvesting, road construction etc. so as to maintain the natural features of the soil and its long-time productivity in the forest.	

comment	Damage to forests should not be taking place as a result of FME's activities. Such activities/FMEs should not be certifiable under this Standard.	accepted
comment	There should be a separate Criterion/Indicator on the assessment of the social impact of planned environment-related activities within the FME on the local community, and forest dwelling and dependent people. The need to assess cumulative impact (environmental and social) prior to the execution of the planned activities is important to highlight.	indicator added to address the same
5	Indicator 11.4.2: Any use of biological control agents shall take place only when unavoidably necessary and after exhaustion of all other possible avenues, and only under strict internationally accepted protocols for documentation, monitoring and control and in compliance with applicable laws and regulations. The use of biological control agents shall be always with a precautionary approach.	
comment	how will this be verified??	modified
6	Indicator 11.5.1 (a): In all cases, the introduction of exotics in natural forest areas or plantations within natural forest areas (other than areas previously designated (b) as being set aside for commercial plantations) within the FME shall be strictly prohibited.	

comment (a)	11.5.1 currently reads like a Criteria. The wording needs to be tweaked so that it reads like an Indicator.	modified
comment (b)	what time frame / threshold denotes 'previously'??	modified
7	Indicator 11.5.5: In areas where previously introduced exotics have been found to be problematic and/or invasive in nature, the FME shall develop and implement measures for controlling the harmful invasive species. This includes, but is not limited to, phasing out of exotics from the region and promotion of indigenous species to recapture the space from exotics.	
comment	the indigenous species should also be allowed to regenerate. please incorporat here	modified
8	Remove "a." from last line on page no. 39	
9	Indicator 13.1.3: The FME shall demonstrate an awareness and sensitivity to non-income generating ecosystem services, and engages in regular dialogue with stakeholders who are dependent on these services and may be potentially affected by forestry operations.	
comment	how often does 'regular' denote? please clarify but also ensure consistency in such time frames used under different P&C across the document	modified

10	<p>Criterion 13.3: The FME shall have in place written guidelines for protection of soil and water resources, and put in place appropriate soil and moisture conservation measures to maintain and enhance the soil characteristics and quality of water (ground water and surface water). Further, measures to control soil erosion, run off etc. shall also be established, including, but not restricted to, stream buffer zones, road and drainage construction guidelines, slope harvest guidelines etc.</p>	
comment	<p>The guidelines should be approved by the certifying authority and should be in accordance with law. Please reflect this in the Criterion/Indicators.</p>	indicator modified
11	<p>Principle 14: Criteria 14.2</p>	
	<p>Indicator 14.2.1: The FME should undertake an assessment of the rare, threatened, endemic and endangered species and their habitats within the FMU along with a listing of species prone to overexploitation in the forest area.</p>	
comment	<p>an 'independent' assessment ?</p>	retained as it is

	12	<p>Criterion 14.3: The FME shall measure the biodiversity values of the forest area using scientifically based monitoring methodology developed in consultation with stakeholders and relevant experts, to determine if values are being maintained or enhanced within the defined forest area. Further, the FME shall assess the possible impact of forest management operations on biodiversity and adopt an appropriate management strategy to ensure that biodiversity losses do not occur (only relevant in the case of forest areas where no High Conservation Values / REET biodiversity values are identified), through utilization of the following hierarchy viz.,</p> <ul style="list-style-type: none"> a) Avoidance of impact b) Minimization of impact c) Restoration/Rehabilitation of biodiversity attributes d) Offsetting of biodiversity impacts by ex situ conservation, forest enrichment etc. e) Additional Conservation Actions 	
	comment	please remove 'biodiversity offsets' as an option	

	<p>Indicator 14.3.6: If there is a net negative impact of forest operations on the biodiversity attributes, either inadvertently, or due to unavoidable reasons (to be determined by the certification body) the FME shall minimise the biodiversity losses, on the basis of severity of impact, by utilization of the following offset hierarchy viz.,</p> <p>a) Avoidance of impact b) Minimization of impact c) Restoration/Rehabilitation of biodiversity attributes f) Additional Conservation Actions g) Offsetting of biodiversity impacts by ex situ conservation, forest enrichment etc. (last option; provided measures a)-d) are not possible or effective</p>	
13		
comment	"f" : numbering error	modified
comment	please remove 'biodiversity offsets' as an option	retained as it is

Post Plantations within forests Principles , Criteria, Indicators

	<u>Comments received from Mr. A K Varma, Chairman , SDG</u>	<u>Review/Comment</u>
Principal 15	The Principles and Criteria 1 -14 ipso facto along with Principle 15 and its Criteria shall apply in planning and management of Plantations, the chief purpose of these plantations being not only to provide social and economic benefits, and to contribute to meeting needs for forest products, but also to promote the productivity and arresting degradation of forest land besides restoration and conservation of natural forests and complementing the management of and reducing pressures on them	
Criteria 15.1	All plantations in the forest including ANR shall be raised as per management objectives including goals for reduction of forest degradation and conservation and enhancement of natural forest that shall be clearly stated in the management plan and demonstrated in its implementation.	<u>Refer Theme 2, Principle 3 Criterion 3.1 Indicators 3.1.1 to 3.1.4</u> <u>Missing elements have been added to the Criterion</u>
Indicator 15.1.1.	All plantations are raised as per a working scheme/ management plan the objectives of which shall include economic and social benefits, reduction in forest degradation, conservation and restoration of natural forests and ecological and silvicultural requirement of species.	<u>See above</u>
Indicator 15.1.2.	All the above objectives shall also be reflected in the associated policies in forest management activities and/or administrative actions of the FME and the evidence of implementation these as well as of the objectives identified in 15.1.1 shall be provided by them	<u>See above</u>
Criteria 15.2	All forest plantations should be so designed in their lay out and constitution as to enhance its health, vitality and productivity, promote protection, restoration and conservation of natural forests, arrest their degradation, progressively reduce demand	

	on them and not increase pressures on it. Bio diversity hot spots, wildlife corridors, watershed and streamside zones and a mix of stands of different species, ages and rotation periods should be used in the layout of the plantation blocks, consistent with the scale of the operation and the patterns of forest stands found within the natural landscape.	
Indicator 15.2.1 (Applicable for non-commercial plantations)	The scale and layout of existing and new plantation blocks are consistent with the patterns of natural forest stands within the landscape including species mix and diversity	<u>New indicator added – 11.1.9</u>
		<u>New indicator added – 11.1.10</u>
Indicator 15.2.2	The FME shall design plantations to include stands with a diversity of age classes and rotation periods.	
Indicator 15.2.3	The FME identifies, protects conserves and enhances all areas of natural vegetation and wildlife corridors in accordance to Criterion ...	<u>Indicator 5.4.2, 11.1.1, 11.1.3</u>
Indicator 15.2.4	Buffer zones of natural vegetation are maintained or established along watercourses in accordance to C...	<u>Indicator 5.3.4, 11.2.8</u>
Criteria 15.3	Diversity in composition of plantations at the land scape level of the FMU is preferred including diversity in number and genetic composition of species, age classes and structures so as to enhance economic value, ecological balance and social stability.	<u>Covered in various elements of criterion 11.1</u>
Indicator 15.3.1	The FME shall employ a variety of species, provenances, and/or clones to achieve optimal economic value, ecological balance and social stability.	<u>Refer 11.1.10</u>
Indicator 15.3.2	The FME shall introduce diversity to established and new plantations in accordance to indicators 15.2.2 and 15.3.1, and through practices such as: cut blocks of different size and shape, and maintenance of volunteer (naturally established) seedlings and other structural components within plantation stands. The FME shall introduce diversity to established and new plantations in accordance to indicators 15.2.2 and 15.3.1, and through practices such as: cut blocks of different size and shape, and maintenance of volunteer (naturally established) seedlings and other structural components within plantation stands.	

Criteria 15.4	The species for planting shall be chosen based on their overall site specific suitability, their appropriateness to the management objectives and contribution to the conservation of biological diversity and the restoration of degraded ecosystems with preference for native species over exotic species, which shall be used only when their performance is greater than that of native species. Exotic species shall be carefully monitored to detect unusual mortality, disease, or insect outbreaks and adverse ecological impacts.	<u>Refer elements of Criterion 11.5 Indicators 11.5.1 - 11.5.5</u>
Indicator 15.4.1	First priority is given to native species fulfilling the chief management objective; exotic species are planted only after an assessment of native species is conducted, demonstrating that the former is superior and better in comparable performance levels.	<u>Refer elements of Criterion 11.5 Indicators 11.5.1 - 11.5.5</u>
Indicator 15.4.2	. FME conducts periodic monitoring of the adaptability of exotic stands, as indicated by measured levels of mortality, disease and insect outbreaks.	<u>New indicator added – 11.5.6N</u>
Indicator 15.4.3	Suitability of plantation species and provenances is based on documented trials that determine their selection for the plantation sites and management objectives	<u>Refer elements of Criterion 11.5 Indicators 11.5.1 - 11.5.5</u>
Indicator 15.4.4	. The management plan or another suitable document shall record full information about the source of seed or planting stock.	<u>New indicator added – 11.5.7</u>
Criteria 15.5 (Indicators Applicable for non-commercial plantations)	A proportion of the overall forest management area, appropriate to the scale of the plantation, shall be managed so as to restore the site to a natural forest cover.	
Indicator 15.5.1	Representative samples of existing natural ecosystems are being protected or restored in their natural state, per the requirements of C...	<u>Refer indicators 11.1.1- 11.1.3</u>
Criteria 15.6	Maintenance or improvement of soil structure, fertility, and biological activity shall be ensured through appropriate measures. The choice of species, techniques and rate of harvesting, road and trail construction and maintenance, shall not result in long term soil degradation or adverse impacts on water quality, quantity or substantial deviation from stream course drainage patterns.	<u>Refer Criterion 13.3; to be read in conjunction with Indicators 11.2.4-11.2.6</u>

Indicator 15.6.1	Explicit measures shall be taken to maintain or enhance the soil in terms of structure, fertility and biological activity.	<u>See above</u>
Indicator 15.6.2	Impacts to soil and water resources shall be minimized by the FME which shall implement BMPs established in C... to achieve above	<u>See above</u>
Indicator 15.6.3	For any adversely impacted and degraded soil and water resources in the FMU, the FME shall implement measures to mitigate such impacts.	<u>See above</u>
Criteria 15.7	Prevention and minimization of outbreaks of pests, diseases, fire and invasive plant introductions along with integrated pest management shall form an essential part of the management plan, with focus on prevention and biological control methods instead of chemical pesticides and fertilizers, the use of which should be progressively lessened including their use in nurseries. The use of chemicals is also covered in Criteria .	
Indicator 15.7.1	Regular monitoring and mitigating measures for pest and pathogen activity, inordinate levels of mortality, and the spread of invasive exotic plants shall form part of Plantation forest standard operating procedures	<u>Refer Criterion 4.2 indicators 4.2.1-4.2.2, also criterion 11.5, 11.1.7</u>
Indicator 15.7.2	The FME shall have policies and guidelines for integrated pest management in the management plan, that are demonstrably followed in the field for any chemical pesticides and fertilizers use or their inclusion as a management option	<u>Refer Indicator 11.3.1 – 11.3.5</u>
Indicator 15.7.3	The FME, through its policies and actions, demonstrates a commitment to progressively lessen the use of chemical pesticides and fertilizers.	<u>New indicator added – 11.3.2</u>
Indicator 15.7.4	The FME has a written fire prevention and suppression plan which it implements appropriate to the scale and intensity of fire hazard	<u>Incorporated newly in Criterion 3.1</u>
Criteria 15.8	Appropriate to the scale and diversity of the operation, monitoring of plantations shall include regular assessment of potential on-site and off-site ecological and social impacts, (e.g. natural regeneration, effects on water resources and soil fertility, and impacts on local welfare and social well-being), in addition to those elements addressed in Principles. No species should be planted on a large scale until local trials and/or experience have shown that they are ecologically well-adapted to the site, are not invasive, and do not have significant negative ecological impacts on other ecosystems. Special attention will be paid to social issues of land acquisition for plantations, especially the protection of local rights of ownership, use or access.	

Indicator 15.8.1	Monitoring of the impacts of plantations, both on and off-site, shall be conducted in the same manner as the monitoring of natural forests, in accordance with Principles...	<u>Covered as part of Theme B Principle 5 Criterion 5.1 and 5.2</u>
Indicator 15.8.2	Acquisition/transfer of land for establishment of plantation forests does not adversely impact, without due compensation, local ownership rights or access/use patterns.	<u>Covered in detail in Principle 2 Criteria 2.1, 2.2. and 2.3</u>
Criteria 15.9	Post November 1994 Plantations established in areas converted from natural forests normally shall not qualify for certification except in cases where approval under FC Act (1980) has been accorded. Certification may also be allowed in such circumstances where sufficient evidence is submitted to the certification body that the manager/owner is not responsible directly or indirectly of such conversion	<u>Refer Criterion 11.6 – covered in detail for all forest areas, including plantations.</u>
Indicator 15.9.1	Records are of sufficient detail to enable the NCCF auditor(s) to determine if conversion of natural forests to plantations has occurred since November, 1994.	<u>Refer Criterion 11.6 – covered in detail for all forest areas, including plantations.</u>
Indicator 15.9.2	The FME provides copy of the approval under FC Act 1980 for such conversion or provides clear and sufficient evidence that it was not directly or indirectly responsible for the conversion.	<u>Refer Criterion 11.6 – covered in detail for all forest areas, including plantations.</u>

Stage – Final Draft Post Consultation review sheet

1. The standard document draft has been revised and reframed as per the International certification standard format after adding introduction, foreward , table of content etc to give it a final format .
2. The review has been done taking into consideration the concerns from the perspect of accreditation requirement and views of TWG members expressed during the meeting

S. No.	DoC	Criteria/Indicator	Name	Question/Comments	Review
1		Introduction	IA Khan	in the introductory parapgraph 'broad level' should not replaced with 'generic level'	The Format of the standard has been revised as per the International and NCCF norms of the standard format and thus this comment is addressed
2		Standard	AK Bansal	Abbreviations use may be given at one place in the beginning and also first time when they are used in the text.	addressed
3		Introduction	AK Varma	Call it generic certification PCI standards for FM instead of broad level and to develop specific standards for NE areas at least where land tenures /People's rights over forests and d management of Forests are drastically different from rest of India	

4		Foreword-para 2:	AK Bansal	ADCS in NE region do not have ownership of forests – the forest are owned by the communities. ADCs have powers to make rules related to community forests.	Accepted, autonomous councils may not have ownership rights, but they exert significant management control
5	17.07.17	Foreword-para 2:		More significant compared to what? Do we mean compared to the State? Again ADC do not have ownership but role only in management of community forests owned by the communities.	Accepted, autonomous councils may not have ownership rights, but they exert significant management control
6		Foreword-para 3:		Diversion of forest for other uses including food production?	We cannot discount the possibility of any diversion of private lands for food production. Another possibility is jhum cultivation
8	17.07.17	Foreword-para 3:		"judicious use of forests and their resources would depend upon proper management of forest areas" Any specific purpose for using different terms – forest, forest resources and forest areas, lands?	No specific reason..based on the flow of the language, may be addressed better at the stage of drafting.
9		Foreword last para:		“Standard is intended for voluntary application to any forest, plantation or tree covered area, regardless of size or ownership” – potential overlap/conflict with NCCF standard for TOF .	No conflict as the ToF standards will come out of the present standards with specific PCI for

					the former.
10	17.07.17	Foreword last para:		Potential overlap with ToF standards unless we clarify the applicability of standards fro FM and TOF.	No conflict as the ToF standards will come out of the present standards with specific PCI for the former.
11		Introduction Part		“major issues relevant to forest certification have been grouped together into similar Themes, with the Themes further designed and organized to conform to the ‘triple bottom-line’ approach of sustainability and responsible forest management, with the underlying ideal of ‘socially beneficial, environmentally responsible and economically viable’ forest management.” – may be modified to “major issues relevant to forest certification have been grouped <u>together</u> into <u>similar</u> Themes, which are <u>with the Themes</u> further categorized into Principles <u>designed and organized</u> to conform to the ‘triple bottom-line’ approach of sustainability and responsible forest management, with the underlying ideal of ‘socially beneficial, environmentally responsible and economically viable’ forest management	minor drafting - accepeted (redrafted)
12	15.07.17	Pg 2; second para	A K Varma	This is also intended to serve as generic standard for development of specific standards for NWFP, Tree and Plantations outside Forest area etc .	addressed
13	17.07.17	Pg 6	AK Bansal	"There would be areas of overlap between....." Will it improve if we use may instead of would?	accepted, addressed
14	17.07.17	Pg 6	AK Bansal	Grammer “themes and their”?	accepted, addressed

15	15.07.17	pg 9	A K Varma	In the 7th line replace 'as well as' by 'and'	accepted, addressed
16	15.07.17	pg 10		Theme C description -Line 3-remove the word 'on' and in line12 replace 'as well as' by 'and'	accepted, addressed
17	15.07.17	pg 11		Theme E description -Line 5- replace the word 'no' by 'non' and remove the word 'negative' in Line 6 replace 'no employment' by 'and bar of employment'	accepted, addressed
18		Generic	AK Bansal	Generally speaking, what is the expected relationship of FM standard with the proposed standard for NWFPs. What should be additional (?) requirement for certification of NWFPs coming out of a certified FMU.	The SFM Standard will form the basis of the further standards . No conflict will be there with the standards of NWFP.
19		Standard	KD Singh	Firstly, our main concern is with "tropical forests" with a mixture of many species. To manage such mixed forests on a sustainable basis, very demanding research is required. We have to develop policy, strategy, law for SFM in our tropical forest context; and in parallel develop institution, research and capacity to guide appropriate SFM. A bit like what we did in India till say before 1980, before Supreme Court took over guidance of our forest management. SFM must be defined in the context of our national needs and priorities set by sector studies and research. Policy and law should facilitate and not hinder SFM. I have 20 year data from Adilabad, showing that our forests are aging and pole crop declining. But, silviculture is a bad word!	Generic comment - The Group agrees with the concerns , however it doesn't fall under the pervue of the certification standard rather than more with the Government and NCCF in its capacity will try and address it at institutional level

20		Standard		<p>Secondly, SFM issues are not static, but dynamic and must change with time. We must identify changing needs / priorities / strategies for forest sector development based on studies of national needs and priorities. We must develop R&D for multiple use forestry: research for very fast growing plantations and promote industries like Chile, at same time set apart significant areas for complete conservation; and leave some for low intensity community based sustainable NTFP management, and set apart significant areas for our traditional multiple use forestry. We need to develop mosaic of sustainably managed forests like an artist. We are a major country! We must inspire and enhance capacity of our young tropical foresters world-over to take over command and steer the forestry(- ship) in the turbulent world politics of SFM and not led by third party opinions, though they may be invited to express their view point and we patiently hear them.</p>	<p>The standards follows the applicable laws, policies and will have a revision period of 2 years to incorporate and be in line with the changing national and international policies</p>
21		Theme A	AK Bansal	<p>“compliance to national and international agreements to which India is a signatory” the word national may be deleted unless we have knowledge about some “national agreements”.</p>	Revised
22	17.07.17	Theme A		<p>What are national agreements? Any examples?</p>	REMOVED and revised
23		Theme A		<p>Earlier on page 8 terms “issues” has been used and here the term used is topics. Any reason.. for using different terms?</p>	<p>No particular reason for the change in the words. Further the structuring has been revised .</p>

24		Theme B		“development of objectives of the management plan (silvicultural, socio-economic, environmental) ” – perhaps we mean objective of the management”.	yes
25		Theme B		The std uses both terms – management plan and working plan? Why not use only one term?	Management plan is a generic term and also used for certain specific managemets of NWFP/ PLANATIONS and PAs etc where as WP is for forests owned by Govt. So both terms are used to suit any of above . Also both are defined in the glossary
26		Theme B	Dr Devendra Pandey	Plan not about Implementation	
27		Theme B	ICRAF	to also include/mention about the current management plans	The standard will include current managment plan
28		Theme B	AC Chaubey	"The draft document has no mention of deviations from the prescriptions of the management plan of the Forest area. If the timber/wood has been extracted from the forest area in violation of the Management Plan prescriptions then it should be treated as illicitly removed wood from the forest, because as per the Management Plan Guidelines issued by MoEF & CC, Government of India all deviations must have the prior approval of the competent authority.	Deviations are mentioned in the Standard Indicator 3.1.3 corrective action report will cover this

29		Theme D	K Rathna	Wood and Non-Wood Products	both are included
30		Theme E	AK Singh	duplicity in terms of society/labour cover in one theme, certain aspects of tribals differently	Such thing was not found in the metioned theme E
31		Standard	AK Varma	Natural forest vs Plantations- there has to be a specific c and I for plantations in addition to what is in the draft- FSC and other examples –and also the definition-of FSC which has defined them separately –See our definition –Plantations in forest land include govt and community e.g. JFPM,VFC types etc	As discussed in the previous TWG meeting , this concern was raised and decided that the Plantation within Forest will form part of the in the existing themes and principles only . The same has been addressed and revised also in the revised standard.
			WWF	Indicators continue to be framed like Criteria. The word 'shall' should not appear in an Indicator. Indicators should be precise and definitive in substantiating whether the corresponding criteria is being fulfilled. (please refer to FSC's guidance on developing indicators).	Not accepted 1. National Accreditation body requirements may differ from this context as per their guidelines and such condition make the status of the accreditation of the standard doubtful.

					2. Making the Indicators specific status clear makes it easy for NCCF also to differentiate the aspirational and mandatory requirements and thus making the gradation in the standard.
32	10.07.17	Standard	Manish Pande	Hierarchy of Principles, Criteria and indicators needs to be clearly defined	addressed
				Some of the principles have too many concepts making them heavy - the subsequent criteria also try to address more than one concept - this will create issue when auditor will check compliance in the field using the standard checklist - need to address one concept per criteria	this has been done by addressing the same in the indicator level
				The use of shall, should and endeavour. The word endeavour could be replaced with 'may' for sake of uniformity	addressed; in some places endeavour is retained due to the context requirement
				In some cases Principle cites the requirement as 'shall' whereas the Criteria mentioned underneath mentions 'should' and 'endeavour' - this will create issues during implementation and in auditing	addressed

				In some cases aspirational criteria have been made a 'shall' requirement	revised and addressed
				The term FMU and FME have been used interchangeably - they mean different - could be placed as per the context	the same has been defined in glossary for clarification
				Plantations needs to be a part of the Standard as a separate principle	As discussed in the previous TWG meeting , this concern was raised and decided that the Plantation within Forest will form part of the in the existing themes and principles only . The same has been addressed and revised also in the revised standard.
				The year of conversion should be the Forest Conservation Act, 1980 rather than taking FSC which is 1996(?) - 'Rationale' - this being a National Scheme we could be having our own benchmark rather than following FSC...PEFC would appreciate our rationale - and so would the FME both governmental and community forest owners.	

				Confidentiality - one needs to open as this is a normal expectations during the management of an FME	accepted and addressed
				There needs to be distinction between the o 'traceability' within the FMU - meaning from harvesting of the forest crop to the farm gate o 'Chain of custody' when the produce moves from one legal entity to other in the supply chain	will be part of the PEFC CoC standard
				o The FM standard and the CoC needs to be launched simultaneously and not sequentially	we are adopting the PEFC-CoC directly and hence this wont be a problem
33		C 2.2	Dr Devendra Pandey	confusing, rights or operations/settlement of rights	
34		P3 & P7	AK Varma	Combine Development and implementation of Management Plan/Working Plan for sustainable harvest regimes for all timber, bamboo, NTFP etc and Survey and Mapping of Inventory of forest resources.	Making such changes at this stage of the process (online consultations) is not recommended . There will be revision cycles of the standard in future , these issues may be considered at that stage .

35	17.07.17	I 1.1.3	A K Bansal	Who do we think is responsible to bring the non-compliances to the notice of FME? Is FME not itself responsible for ensuring compliance to applicable laws? Through this are we knowingly diluting the responsibility of FME about ensuring compliance to laws/regulations?	<p>This was an additional clause that was put by the TWG. It is to ensure that any non-compliance which may have escaped the notice of the FME, or was noticed by someone else first, is not the reason for issuance of a non-conformity against this clause. This is important especially when the FME might not be a statutory body having regulatory powers addressed;</p> <p>modified with "suitable actions";</p>
36	17.07.17	I 1.1.4	A K Bansal	And perhaps brought to the notice of FME as per indicator 1.1.3.	addressed; added to the indicator
37	17.07.17	I 1.2.3	A K Bansal	modify make to makes	addressed
38	17.07.17	C 1.3	A K Bansal	"binding" The word appears superfluous.	addressed; definition added

39	17.07.17	I 1.3.1	A K Bansal	"Once ratified....." Not very clear what laws are we referring to here?	Laws which are derived to implement these agreements on the ground. some modification made
40	17.07.17	I 1.4.3	A K Bansal	"wherever warranted" Appears superfluous. Are all illegal activities not to be dealt with in accordance with applicable laws?	minor modifications made
41	17.07.17	I 2.2.1	A K Bansal	and extent. Do we think description of rights by nature is good enough?	addressed; modified "extent added";
42		C 3.1.f	AK Bansal	Rationale for rates of annual harvest and species selection . Does it relate also to NWFPs?	depends on the scope of the FME MP (related to which species to include or which not)
43		I 3.3.1	IA Khan	I be corresponding to C	it is .
44	17.07.17	I 3.3.1 & 3.3.2	A K Bansal	Reference to stakeholder consultation in the course of implementation of management plan may be made explicit rather than covering in under 3.3.1 which seems to relate primarily to preparation of management Plan.	You are right, stakeholder engagement occurs at 3 stages viz., plan

45	17.07.17	C 3.3	A K Bansal	The FME re shall undertakebe a process of stakeholder identification, consultation and engagement during the process of plan development and implementation stages .	development, plan implementation, and plan revision (which includes an element of monitoring and evaluation as well). Suggest the following changes as marked.
46	17.07.17	C 3.4	A K Bansal	By primary elements are we meaning a-p of Criterion 3.1?	Yes, but it may include more as well, depending on the field conditions and excluding confidential information.
47	17.07.17	I 3.4.1	A K Bansal	"main contents" Is it the same as primary elements 3.4 above. If not differences?	addressed; primary elements
48	17.07.17	I 4.2.1	A K Bansal	Clubbing of overgrazing and overstocking together like pests and diseases needs a relook unless it has been done intentionally for some specific reason.	removed as already mentioned in the criteria; There is no specific reason behind this .Both the elements are under the Health and Vitality of the forests and has been clubbed together here as an enlisting

					part . The same is mentioned in the compartment description of the NWPC
49		I 4.2.1		such as pests and diseases, overgrazing and overstocking, fire, climate factors including droughts, floods, etc.	removed as already mentioned in the criteria
50		I 4.3.3	AK Bansal	The reviews are undertaken at the FME level at least annually – is it feasible under the given scenario?	will be covered under the surveillance audit
51		I 4.3.3		and the results of the reviewsameare made available to the certification assessment team on request	Removed; covered under the scope and doesn't need specific mention
52		C 4.4	AK Varma	Improvement of Criteria; about the forest to gate traceability and CoC; CW aspect be brought into this	As per the international standard setting norms, the standard setting body prepares only the FM certification and CoC Standard . The FM-CoC checklist is prepared by the CBs and further inspected/approved

					by the Accreditation Bodies to check if it has incorporated the requirements of both the standards , as applicable. This checklist (FM- CoC) may differ for each CBs as per their formats.
53	17.07.17	I 4.5.3	A K Bansal	"equitable management " Looks like a new concept “equitable management” of forest resources used in this indicator only? Hopefully it has been defined.	addressed; removed
54		P4 & P5		Combine Monitoring, Assessment and Review of management plan and its implementation and Social, Economic and Environmental Impacts of Forest Management	Making such changes at this stage of the process (after online consultations) is not recommended . There will be revision cycles of the standard in future , these issues may be considered at that stage .

55		C 5.1	AK Bansal	Includes underground water resources? No specific indicator for soil and water resources.	Yes , it includes all the water resources. The indicators for soil and water is included in the indicators (Indicator 11, Indicator 13)
56			AK Bansal	Where are the “Adequacy of resources – human, financial etc. fro implementation of management Plan” included.	Indicator 8.1.2.
57	17.07.17	I 5.4.1	A K Bansal	"as additional information is acquired. " Sentence structure?	addressed; Revised to as and when additional information is acquired
58	17.07.17	I 5.4.5	A K Bansal	"desired species..." Desired spp. conceptually contradicts natural/local spp. and natural variability in forests.	Desired species could mean different things, for plantations, or naturally stocked areas, the desired species could be those with economic value, however, for other areas, desired species could also refer to the natural vegetation and species matrix of the area, which is what we desire when we

					want to increase the biodiversity levels.
59		P6 & P8	AK Varma	Combine Benefits from Forests including identifying, quantifying and valuation of ecosystem services –both tangible and non-tangible - and contribution of forest management activities to climate change mitigation and adaptation, change in forest carbon inventories etc.	Making such changes at this stage of the process (after online consultations) is not recommended . There will be revision cycles of the standard in future , these issues may be considered at that stage .
60		C 6.1	IA Khan	carbon cycle not carbon stocking	In context of certification and calibration , carbon stock is the suitable word
61		I 6.1.3	AK Bansal	What about the carbon removal accounting at intermediate/final timber harvest. Or removal in terms of leaves, fuel wood etc.	its covered

62	17.07.17	C 6.3	A K Bansal	"forestry operations" How different they are from forest management operations since everywhere the term used is Forest Management Operation except in this and indicator 13.16.	addressed; modified as forest management plans
63		I 6.3.4	AK Bansal	Why name one programme/scheme? There may be several or none?	GIM reference removed ; As an aspirational indicator, we wish the FME actions to contribute to the national effort, which is represented by the NAPCC/SAPCC. They may be best represented by an existing program like the GIM, but not compulsorily, and the FME may evaluate other options as well
64	17.07.17	I 6.3.4	A K Bansal	Why the FME actions are to be consistent with programmes like GIM? What is the sanctity SAPCC – are they approved by state cabinet/Government?	addressed
65			AK Bansal	Two terms have been used – commercial and merchantable? Difference /definition. Also product and produce?	product

66	17.07.17	C 7.1	A K Bansal	"under the ambit of certification" Where is the ambit (to be) defined?	addressed; Which FME wants to bring under the scope of certification
67	17.07.17	I 7.1.3	A K Bansal	"with the replenishment/restocking rates for a healthy forest of similar ecological type" Standards for comparison available?	Comparison with neighboring forests or protected areas which may have a better ecological profile
68	17.07.17	I 7.2.3	A K Bansal	sustainable harvest techniques; highlighted	for non-wood products even the sustainable harvest techniques are important to ascertain resource sustainability
69		I 7.3.1	AK Bansal	For natural forest management operations, the average annual harvests, either by area, volume or mass, does not exceed the annual removable harvest limits established through Criterion 7.2 and the limits prescribed under the applicable Working Plans (for state forests). What about non-state forests?	accpeted
70	17.07.17	I 8.3.5	A K Bansal	are' modified by 'is'	addressed
71	17.07.17	C 8.4	A K Bansal	"legislative" modified as legal	addressed; but legislative can also be an apt word here – govt authroised framework

72		I 9.2.2	AK Bansal	training programs to enhance the capabilities and qualifications. What is the relevance of qualifications?	revised
73		I 10.3.5	AK Bansal	All workers are paid the legal minimum wage rates; which shall be derived as applicable from one of the following wage schedules, at rates applicable at the time of assessment: 1. Minimum wages as designated by the Minimum Wages Act, 1948 2. State specific Daily Minimum Wage Rates 3. MGNREGA state specific daily wage rates 4. Industry recognized wage agreements in consultation with workers' representatives Why refer to these? Which one takes precedence? Enough to say applicable minimum wages. Which one?	which ever is higher
74		I 10.3.6	AK Bansal	The FME has appointed an officer of sufficient rank within its management	A officially apoint authority needs to be there for the GRC committee.
75		I 10.4.3		FME ensures use and All FME employees have access to adequate safety equipment by all employees and and are trained in the appropriate training for usage of such equipment and chemicals. This training includes safety training along with usage training .	write up revised

76		Principle 11 & Principle 14	AK Varma	Combining P14 exclusively for Biodiversity Ecology, Biodiversity and Natural Resource Management – Conservation, Enhancement and Rehabilitation including measures for conservation, maintenance and rehabilitation of losses to Biodiversity values arising out of management activities or occurring within the FME	Making such changes at this stage of the process (after online consultations) is not recommended . There will be revision cycles of the standard in future , these issues may be considered at that stage .
77	17.07.17	I 11.1.3	A K Bansal	Hopefully, demarcation on ground is not provided deliberately.	added
78		I 11.1.8	AK Bansal	Stem density of well stocked forests of similar forest type needs to be the target of any NR or ANR activities. What about stand structure?	write up revised
79		I 11.2.4	AK Bansal	impact of forest management performance – what is the significance of the word performance here?	addressed; performance removed
80		C 11.3	Manish Pande	Pesticides, IPM, the process flow needs to be sorted	addressed
82		C 11.5	Dr Devendra Pandey	Covered under TOF and is coming in SFM, is the Criteria relevant to SFM or not	do-but ToF will have inflow from present generic standards

83		I 11.5.1	WWF	<p>he caveats provided in this indicator (i.e. "does not permit unless it is proved..." and "only in plantations") contradicts the Criterion which states that "introduction of exotics in natural forest areas as well as plantations within natural forest areas within the FME shall be strictly prohibited".</p> <p>Suggest deletion of Indicator 11.5.1</p>	revised
84		I 11.5.2	AK Varma	<p>shall be looked into; remove the word 'strictly'; subject to the scope of the scheme; relevant in SFM now or not as it is covered in a separate Standard</p>	revised
85		I 11.5.3	WWF	<p>please mention that this verification needs to take place prior to the introduction of the species.</p>	revised
86		Principle 13	Dr Devendra Pandey	<p>Forest Ecosystem Services; Confusing, to study and quantify the ESS, specify in the indicators</p>	revised
87		C 13.1	A K Varma	<p>Further in many places criteria much larger than indicators and they are almost ditto worded e.g.13.1 criteria is ditto as indicator 13.1.1 There are many such examples.</p>	Criteria is broad and generic whereas the indicator defines the specifications and necessary requirements
88		C 14.3		<p>REET biodiversity</p>	retained; but write up revised no longer using the acronym REET/RET
89		C 14.3	A K Varma	<p>Why escape clause in 14.3?</p>	write up revised

90		Plantations : Principle 15	A K Varma	<p>The criteria and indicators of Plantations Principles (15) viz 15.1-15.9 are specific to plantations and need to be addressed as such even though they appear in a general form in various other PCI . For example criteria 15.1 itself. There are many such examples such as given below</p> <p>As enunciated in Principle 15 itself, these would be applicable to plantation in addition to Principle 1 to 14 and therefore similarity of some of the C and I with FM will always be there. Moreover plantations have a separate and distinct identity and objectives. So it may be retained as a separate Principle as it will not cause any harm. On the other hand it would strengthen the sustainability practices.</p>	<p>All the concerns were discussed , marked and circulated during the initial phase of including the plantations in the standard at the early stage itself. Further some revision have been made in the standard pertaining to plantations. The plantations in Natural forests are being addressed in the current standard , hence currently the addition of a separate principle is not suggested and the plantations other than that will be addressed under the ToF standard. Also, making such changes at this stage of the process (after online consultations) is not recommended . However after the</p>
91		C 15.4	A K Varma	11.5 does not address full concerns of 15.4	
92			A K Varma	11.5.1- documented trial word?	
93		C 15.6	A K Varma	All concerns of 15.6 not covered including those in the criteria and 11.2.4-11.2.6 do not exactly match with 15.6.1-15.6.3 as the later is specific to forest soil and water	
94		C 15.8	A K Varma	15.8, 15.8.1 and 15.8.2 are specifically flagged for plantations whereas the criteria/indicators cited in the reply (5, 5.1, 5.2 and 2, 2.1, 2.2 and 2.3 are general C and I and do not address fully the concerns raised in former.	
95		C 15.9	A K Varma	No doubt 15.9 is covered partially in 11.6 and more fully in 11.7, but the former is specific to plantations in a much concise manner and hence may be retained.	

