

Existing Guidelines for Eco-Certification of Natural Rubber and Rubber Wood



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Summary

This report is a compilation of existing guidelines for eco-certification of natural rubber and rubber wood. Certification systems that deal with rubber and rubber wood and products derived from them are many. Of these, the Forest Stewardship Council and Sustainable Agriculture Standards are commonly used in India for agricultural and agro-forestry crops. The Sustainable Natural Rubber initiative is a recent addition to this list. There are no specific guidelines for rubber under the FSC and SAN standards. However, for FSC, country specific guidelines for India and Sri Lanka are available and several organisations that deal with rubber, rubber wood products have been certified under FSC standard. We have compiled this, along with examples of likely non-compliances. SNR-i is a new initiative. In this report we also include a note on the criteria for certification under the SNR-i, and suggestions for strengthening the criteria that pertain to the environment and biodiversity.

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Eco-certification for Rubber

There are several Certification systems for sustainably grown and socially responsible products. Amongst these, the Rainforest Alliance and the Sustainable Agriculture Network's, Sustainable Agricultural Standards (SAN Standard) is commonly used for agricultural crops in India. This has however, not been used for rubber plantations and rubber products. On the other hand, a few rubber plantations have been certified by the Forest Stewardship Certification (FSC) which follows the guidelines created by the Scientific Certification Systems (SCS). This largely refers in general to an agro-forestry setup. While most of the country specific performance indicators will be valid, local interpretation guidelines should be drawn for rubber.

Recently, the International Rubber Study Group, an inter-governmental organisation composed of rubber producing and consuming stakeholders has launched the Sustainable Natural Rubber Initiative (SNR-i). As part of this initiative a draft of guidelines for sustainable rubber has been released and the pilot phase is currently being implemented with a number of registrants among the different value chain players by the end of May which included: Plantations (4); Plantations/ Processor (2); Plantations/ Processor/ Trader (1); Trader (1); Downstream user (1). The Government of India is a member of this group.

As a first step, we have compiled the existing performance indicators for India and Sri Lanka for the FSC certification and have included available comments on non-compliance from audit reports from two certified rubber plantations. The SNR-i indicators are also included here.

This document is structured as a table highlighting country-specific performance indicators for each of the 10 FSC principles. Guidelines created by SCS for India and Sri Lanka are included here, as both countries have certified rubber plantations. A list of country-specific guidelines, including those for the countries referenced in this document, can be seen here: <http://www.scsglobalservices.com/certification-standards-and-program-documents>.

In India there are 11 organisations (including manufacturers and plantations) and in Sri Lanka there are 26 that use or grow rubber and are listed as being certified under FSC (<http://info.fsc.org/certificate.php>). In addition, notes from certification audits available from the FSC website are included. These audits evaluated the organizations' (including farming operations') compliance with FSC criteria, using the country-specific guidelines and are indicative of non-compliances that are likely to be encountered and need to be address to get FSC certified.

The SAN standard for agriculture has not been included in this document at this time, as we did not find any reference to it being used for certification of rubber.

However, in the farm certification policy document of SAN (http://sanstandards.org/userfiles/file/farm_cert_policy.pdf) it states that the SAN Secretariat does authorize Rainforest Alliance Certified™ certification for clients who cultivate rubber, but no specific guidelines are readily available.

The advantages and drawbacks of using the SAN standard should be explored in more detail and compared to those of the FSC standards in the context of certification of natural rubber and rubber wood in India.

Following are the links to the specific documents from which the table has been compiled from:

For India: This document also includes a list of pertinent Indian laws,

www.scsglobalservices.com/files/standards/FM_STN_SCS_InterimStandard_India_V1-1_043010.pdf

For Sri Lanka:

www.scsglobalservices.com/files/standards/FM_STN_SCSInterimSriLanka_V1-0_031610.pdf

International Standards

www.scsglobalservices.com/files/standards/FSC_STD_01_001_V4_0_EN_FSC_Principles_and_Criteria.pdf

The Sustainable Natural Rubber Initiative guidelines is available at

http://snri.org/Voluntary%20Guidelines%20and%20Criteria%20Version%201_13_1.htm

The Sustainable agriculture network (SAN) standard can be accessed at <http://sanstandards.org/userfiles/file/SAN%20Sustainable%20Agriculture%20Standard%20July%202010.pdf>

Examples of non-compliance are from documents available on the FSC website for certified organizations.

Forest Stewardship Council (FSC)

Principle #1: Compliance with laws and FSC Principles

Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
1.1 Forest management shall respect all national and local laws and administrative requirements.	<p>1.1.1) An up-to-date register (reference list) of all pertinent statutes and bodies of regulations is maintained and is available to forest managers; summaries of key regulations are kept in field offices</p> <p>1.1.2) The frequency and nature of regulatory violations shall not be indicative of widespread and systemic non-compliance; when violations occur, forest managers act promptly to correct and remediate the circumstances associated with the violation</p> <p>Note: Non-conformance to this Indicator constitutes a Major Failure and precludes award of certification until appropriately corrected.</p>	<p>1.1.1) The Forest Management Enterprise (FME) maintains an up to date register of all pertinent statutes and bodies of regulations and makes this register available to forest managers; summaries of key regulations are kept in field offices.</p> <p>1.1.2) The FME shall comply with all applicable national and local forestry, environmental, and labour laws and regulations. The FME resolves any case of incompliance with these laws and regulations with the appropriate authorities.</p> <p>1.1.3) The frequency and nature of regulatory violations shall not be indicative of widespread and systemic non-compliance; when violations occur, the FME acts promptly to correct and remediate the circumstances associated with the violation.</p> <p>Note: Non-conformance to this Indicator constitutes a Major Failure and precludes award of certification until appropriately corrected.</p>
1.2 All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	<p>1.2.1) There is no evidence of chronic non-payment; rather, payments are regularly made in a timely manner</p> <p>1.2.2) Up-to-date records are kept of all payments and are available to the SCS auditor(s)</p>	<p>1.2.1) The FME shall demonstrate evidence that payments of taxes, royalties, and other charges are made in a timely manner. There is no evidence of chronic non-payment.</p> <p>1.2.2) The FME shall maintain up-to-date records of all payments and make these available to the SCS auditing team.</p>
1.3 In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity,	<p>1.3.1) Forest managers are aware of which binding international agreements apply to the nation in which their forest operations reside</p> <p>1.3.2) Forest managers demonstrate a sensitivity to all binding international agreements and endeavor to</p>	<p>1.3.1) The FME shall comply with the intentions of the international agreements that India has ratified (see Appendix 2).</p> <p>1.3.2) The FME's forest managers and field technicians shall have access to and understand the applicable international</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
shall be respected.	respect their requirements, at a level of effort scaled to the size and intensity of the forest operation	agreements and how these are respected in the forest management. Verifiers: - FME has a compendium of applicable international agreements that summarizes how the FME respects these. - Said compendium is available in offices and field sites or camps.
1.4 Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	1.4.1) Forest managers are forthright in informing the SCS auditor(s) of any possible conflicts between laws, regulations and the FSC Principles and Criteria 1.4.2) Forest managers are willing to participate in appropriate processes for resolving conflicts, at the request of SCS and/or the FSC	1.4.1) The FME shall conduct an analysis to identify potential conflicts between applicable national/local laws, the FSC P&C, and international agreements and inform SCS auditors of any such conflicts. 1.4.2) The FME is willing to participate in appropriate processes for resolving conflicts with pertinent entities in order to resolve conflicts between laws/regulations and the FSC P&C, as required by SCS and/or the FSC.
1.5 Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	1.5.1) The management plan contains express policies stating that the defined forest area shall be protected from illegal harvesting, settlement and other unauthorized activities 1.5.2) Forest managers conduct regular surveillances of the defined forest area so that unauthorized activities are promptly found and controlled	1.5.1) The management plan contains express policies stating that the defined forest area shall be protected from illegal harvesting, settlement, harvesting or gathering of RTE species, and other unauthorized activities. 1.5.2) The FME dedicates sufficient resources (human and financial) to monitor for unauthorized activities in such a way that these are promptly detected and controlled and, if appropriate, reported to the relevant authorities. 1.5.3) The FME shall demarcate and clearly post the property boundaries of the Forest Management Unit (FMU) in the field.
1.6 Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.	1.6.1) In the management plan, or another appropriate document of broad public availability, there is an express statement of commitment to the FSC Principles and Criteria 1.6.2) Written copies of the FSC Principles and Criteria are available to all management and field personnel; forest managers demonstrate a general conversancy with the P&C 1.6.3) If the defined forest area for which certification	1.6.1) In the management plan, or another appropriate document of broad public availability, there is an express statement of commitment to the FSC Principles and Criteria. When the FME uses contractors, it shall require its contractors to comply with the FSC P&C. 1.6.2) <i>Verifiers:</i> · <i>Contracts contain clear and appropriate language that requires contractors to comply with the FSC P&C</i> 1.6.3) The FME shall provide access to written or electronic copies of the FSC Principles and Criteria to all management and

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
	<p>is being sought does not constitute the entire ownership, management activities on the portions of the ownership not undergoing certification evaluation are generally compatible with the P&C and conform to the current FSC requirements on partial estate certification</p>	<p>field personnel; FME personnel demonstrate general knowledge of the P&C. 1.6.4) The FME shall provide information on all of the forested areas over which it exercises a certain degree of responsibility for forest management in order to demonstrate compliance with FSC policies on partial certification and on the exclusion of areas from the scope of the certificate. The FME shall not conduct activities that are deliberately in violation of the FSC P&C in forested areas outside the scope of the certificate.</p>
	<p>Examples of non-compliance of FSC Criteria and guidelines: A written policy on publicly available information is available but the web page for public dissemination of information is not available yet. Thus there is no publicly available statement on the need for protecting the plantation or the management commitment to FSC Principles and Criteria. Observation: Although watch and ward apparatus established to prevent illegal activities, this needs to be strengthened.</p>	<p>Examples of non-compliance of FSC Criteria and guidelines: Obtaining approval for rubber plantations in forest land is necessary under the Forest Conservation Act (1980) <i>Note: Hevea</i> is not a restricted species and permissions are not required for harvesting or transportation. However, the proximity of many rubber plantations in India to eco-sensitive areas suggests that caution is required to ensure no illegal harvesting or other illegal activities.</p>

Principle #2: Tenure and use rights and responsibilities

Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>2.1 Clear evidence of long-term forest use rights to the land (e.g. land title, customary rights, or lease agreements) shall be demonstrated.</p>	<p>2.1.1) There is bonafide, written documentation of legal use rights to the defined forest area undergoing the certification evaluation. <i>Legal use rights may be associated with: - fee-simple ownership – long-term or renewable lease rights – long-term or renewable exclusive management agreements – other mechanisms allocating long-term or renewable management rights and responsibilities to the forest manager</i></p>	<p>2.1.1) The FME shall demonstrate that land tenure and rights to the forest resource are clear, legally secure and documented. 2.1.2) <i>Legal use rights may be associated with: Authenticated copies of land titles of the FMU(s); fee simple ownership; long term or renewable lease rights; long term or renewable exclusive management agreements; other mechanisms allocating long term or renewable management rights and responsibilities to the forest manager.</i> In the case of usufruct agreements, the FME shall demonstrate documented evidence of its legal rights to the FMU and at least 10 years for forest management and use of forest resources for the FMU under evaluation for certification.</p>
<p>2.2 Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</p>	<p>2.2.1) Local communities, and/or other stakeholders with duly recognized legal or customary tenure or use rights within the defined forest area have been identified and the nature of these rights are described and documented 2.2.2) <i>Examples of legal or customary tenure or use-rights may include: -public rights of way –established easements – collection of non-timber forest products –hiking, fishing, hunting, or other recreation –firewood collection –visitation of culturally significant sites</i> 2.2.3) Forest managers maintain positive/collaborative working relationships with holders of duly recognized legal or customary tenure or use rights Allocation of duly recognized legal or customary tenure or use rights by local communities to other parties is documented,</p>	<p>2.2.1) The FME shall identify the local communities, and/or other stakeholders with duly recognized legal or customary tenure or use rights within the FMU and describe the nature of these rights in the management plan. When appropriate to the scale and intensity of operations, areas associated with these rights should also be included on maps of the FMU. <i>Examples of legal or customary tenure or use rights may include: public rights of way; established easements; collection of non timber forest products; hiking, fishing, hunting, or other recreation; firewood collection; visitation of culturally significant sites, such as religious shrines.</i> 2.2.2) When communities have delegated control of</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
	with evidence of free and informed consent	their legal rights or customary tenure or use in whole or in part, this must be confirmed by documented agreements and / or interviews with representatives of local communities. 2.2.3) Allocation of duly recognized legal or customary tenure or use rights by local communities to other parties shall be documented, with evidence of free and informed consent.
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. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.	2.3.1) Records are kept of past disputes over tenure claims and use rights, to a level of detail sufficient to enable the SCS auditor(s) to ascertain the nature and magnitude of the disputes 2.3.2) Forest managers can demonstrate, through appropriate documentation, that legally-recognized mechanisms have been employed to resolve disputes over tenure claims and use rights 2.3.3) The magnitude and severity of unresolved tenure claims and use rights disputes are minor, relative to the scale of forest management operations	2.3.1) Conflicts over land tenure and use rights shall be resolved or discussed in a systematic and legal manner, with preference given to voluntary and conciliatory methods rather than the through the judiciary mechanisms (e.g., courts). <i>Verifiers:</i> · <i>Records or other relevant documents that detail past and current disputes over tenure claims and use rights are maintained and made available to SCS auditors.</i> · <i>Agreements and / or mechanisms to resolve disputes over tenure claims and use rights are documented.</i> 2.3.2)The magnitude and severity of unresolved tenure claims and use rights disputes are minor, relative to the scale of forest management operations.
	<i>Examples of non-compliance of FSC Criteria and guidelines:</i> The company has not conducted an assessment of any existing legal or customary use rights nor have they documented any of the same. No documented approaches to resolve tenure and use rights of local communities.	<i>Examples of non-compliance of FSC Criteria and guidelines:</i>

Principle #3: Indigenous peoples' rights

The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>3.1 Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies..</p>	<p>3.1.1) Forest managers seek to determine if there are existing indigenous peoples issues (e.g., land claims) associated with the defined forest area that is the focus of the certification evaluation</p> <p>3.1.2) If the defined forest area is comprised of or includes lands or territories duly owned or controlled by indigenous peoples, management of said lands is either: i) under the control of the indigenous peoples or ii) undertaken by other parties to whom free and informed consent to manage has been granted, and appropriately documented, by appropriate indigenous representatives</p> <p>3.1.3) Where rights and use issues involving indigenous peoples are in dispute, an appropriate process for addressing and resolving grievances is in place and being actively utilized by the forest managers/owners</p>	<p>3.1.1) The FME seeks to determine if there are existing indigenous peoples issues (e.g.,land claims) associated with the FMU that is the focus of the certification evaluation.</p> <p>3.1.2) If the defined forest area is comprised of or includes lands or territories duly owned or controlled by indigenous peoples, management of said lands is either: i) under the control of the indigenous peoples or ii) undertaken by other parties to whom free and informed consent to manage has been granted by appropriate indigenous representatives, and appropriately documented in legally established agreements and contracts.</p> <p>3.1.3) Where rights and use issues involving indigenous peoples are in dispute, an appropriate process for addressing and resolving grievances is in place and being actively utilized by the FME.</p> <p>3.1.4) The FME shall comply with the contracts and agreements established with indigenous groups.</p>
<p>3.2 Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</p>	<p>3.2.1) Forest managers demonstrate, through policies and actions, a sensitivity to the resources and tenure rights of indigenous peoples</p> <p>3.2.2) As appropriate, indigenous peoples are afforded opportunities to participate in management planning, research, and monitoring on forest areas associated with indigenous resources and tenure rights</p> <p>3.2.3) Forest managers solicit—through effective consultative mechanisms—the concerns and perspectives of potentially</p>	<p>3.2.1) The FME shall demonstrate, through policies and actions, a sensitivity to the resources and tenure rights of indigenous peoples.</p> <p>3.2.2) As appropriate, indigenous peoples are afforded opportunities to participate in management planning, research, and monitoring on forest areas associated with indigenous resources and tenure rights.</p> <p>3.2.3)The FME solicits—through effective consultative mechanisms—the concerns and perspectives of</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
	affected indigenous peoples; the results of such consultation are documented, including the actions taken to reasonable accommodate concerns and perspectives that have been received	potentially affected indigenous peoples; the results of such consultation are documented, including the actions taken to reasonable accommodate concerns and perspectives that have been received. <i>Verifiers: Communications between the FME and indigenous representatives are documented.</i>
3.3 Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	3.3.1) Management activities with potential impacts to sites of special cultural, ecological, economic or religious significance to indigenous peoples are guided by the precautionary principle 3.3.2) Examples of sites may include: -ceremonial, burial, or village sites –areas used for hunting, fishing, or trapping – areas used for gathering of sustenance and culturally important materials 3.3.3) Forest managers engage in affirmative procedures for identifying and appropriately protecting sites of special cultural or religious significance; the processes for identifying and protecting such sites are documented; the management plan contains express written policies for the identification and protection of such sites 3.3.4) Field workers are appropriately trained in the procedures employed for protecting sites of special significance to indigenous peoples 3.3.5) Confidential maps recording the locations of sites of special significance are maintained up-to-date and are used by forest managers and field workers As appropriate, indigenous peoples are afforded opportunities to participate in the identification and protection of sites of special cultural, ecological, economic or religious significance within the defined forest area	3.3.1) The FME, with the participation of indigenous communities, shall define the sites of special cultural, ecological, economic or religious significance. <i>Examples of sites may include: ceremonial, burial, or village sites; areas used for hunting, fishing, or trapping; areas used for gathering of sustenance and culturally important materials.</i> 3.3.2) The management plan contains explicit written policies for the identification and protection of sites of special significance for indigenous peoples. The identified sites should be demarcated on maps of forest operations and, where appropriate, in the field. 3.3.3) Field workers are appropriately trained in the procedures employed for protecting sites of special significance to indigenous peoples. 3.3.4) Findings of special sites of archaeological interest are communicated to the appropriate authorities and the FME abides by the restrictions on use imposed by said authorities for these areas.
3.4 Indigenous peoples shall be compensated for the application of their traditional knowledge	3.4.1) If commercial utility is created through application of traditional knowledge, forest managers seek to compensate, through appropriate mechanisms, those indigenous peoples	3.4.1) Indigenous peoples shall be duly informed of the intention and nature of use of traditional knowledge by the FME. The FME shall not conduct such use until an

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence</p>	<p>with whom the traditional knowledge is associated 3.4.2) Where indigenous intellectual property and forest products are used commercially, compensation for individuals and/or tribes is agreed upon in writing, with their free and informed consent, prior to commercialization</p>	<p>agreement is reached with the indigenous peoples' representatives, with their free and informed consent. 3.4.2) Where indigenous peoples' traditional knowledge, intellectual property and/or forest products are used commercially by the FME, compensation for individuals and/or tribes is agreed upon in writing, with their free and informed consent, prior to commercialization.</p>
	<p>Examples of non-compliance of FSC Criteria and guidelines: The policy of respecting rights of local communities is to be incorporated in the management plan</p> <p>In some occasions, sites of special cultural and religious significance of workers residing in FMUs were not mapped. E.g. burial grounds and religious temples</p>	<p>Examples of non-compliance of FSC Criteria and guidelines: Wood procured by company is typically from suppliers who get from farmers who fell on privately owned land. However, there is no clarity on proximity of these private lands to forest and high biodiversity areas – the impact of agro-forestry activities on the HCV areas in the eco-region is not necessarily addressed</p>

Principle #4: Community relations and worker's rights

Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>4.1 The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</p>	<p>4.1.1) Qualified people in local communities are given preferential opportunities in employment and contracting; the forest management operation actively targets the local workforce</p> <p>4.1.2) Examples may include: -employment and contractual opportunities offered locally before they are offered outside the region</p> <p>4.1.3) Forest managers contribute to or directly develop training programs designed to enhance the capabilities and qualifications of local workers</p> <p>Forest managers give preference to local vendors of equipment and miscellaneous services, subject to cost considerations</p> <p><i>Examples may include: -timber being offered to local processors before being sold out of the region -utilization of local banks, insurance companies, etc.</i></p>	<p>4.1.1) Qualified people in local communities are given preferential opportunities in employment and contracting; the FME actively targets the local workforce</p> <p><i>Examples may include: employment and contractual opportunities offered locally before they are offered outside the region.</i></p> <p>4.1.2) The FME contributes to or directly develops training programs designed to enhance the capabilities and qualifications of local workers.</p> <p>4.1.3) There is active dialogue with representatives of workers and local communities about the identification of opportunities in employment, contracting, and training.</p> <p>4.1.4) The FME gives preference to local vendors of equipment and miscellaneous services, subject to cost considerations.</p> <p><i>Examples may include: timber being offered to local processors before being sold out of the region; utilization of local banks, insurance companies, etc.</i></p>
<p>4.2 Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	<p>4.2.1) The forest management operation demonstrates a priority towards worker safety; there is an active safety program, appropriate to the scale of operations</p> <p>4.2.2) Written guidelines and policies, appropriate to the scale of operations, exist for workplace health and safety</p> <p>4.2.3) <i>For example: written safety guidelines exist for each step of the latex production process, from rubber tapping to processing and manufacturing.</i></p> <p>4.2.4) Appropriate safety equipment is made available to all workers All equipment is periodically inspected and tested for</p>	<p>4.2.1) The FME demonstrates a priority towards worker safety; there is an active safety program, appropriate to the scale of operations.</p> <p>4.2.2) Written guidelines and policies, appropriate to the scale of operations, exist for workplace health and safety.</p> <p><i>Examples may include: written safety guidelines exist for each step of the latex production process, from rubber tapping to processing and manufacturing.</i></p> <p>4.2.3) Appropriate safety equipment is made available to all workers; workers use safety equipment appropriately and</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
	<p>safety performance</p> <p>4.2.5) Up-to-date information on pertinent health and safety laws and regulations is maintained by forest managers and appropriately disseminated to forest workers</p> <p>4.2.6) Forest managers maintain up-to-date safety records; such records indicate exemplary performance relative to industrial norms</p>	<p>demonstrate proper management and harvest techniques.</p> <p>4.2.4) All equipment is periodically inspected and tested for safety performance.</p> <p>4.2.5) Up to date information on pertinent health and safety laws and regulations is maintained by forest managers and appropriately disseminated to forest workers.</p> <p>4.2.6) The FME maintains up-to-date safety records; such records indicate exemplary performance relative to industrial norms.</p> <p>4.2.7) The FME’s policies and labour practices shall guarantee the equal treatment of all employees (without discrimination based race, gender, religion or caste) in relation to recruitment, promotion, dismissal, remuneration and benefits.</p> <p>4.2.8) The FME shall not allow the hiring or contracting of workers less than 14 years of age. In cases of such hiring or contracting, the work must be appropriate to the age, physical conditions, intellectual development, and worker’s morale (See ILO India’s ratified Conventions 5, 15, 90, and 123 and national policies, Child Labour (Prohibition and Regulations) Act of 1986 and the National Policy on Child Labour).</p>
<p>4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labour Organisation (ILO).</p>	<p>4.3.1) Forest managers, by their actions and policies, respect the rights of workers to organize or join trade unions and to engage in collective bargaining</p> <p>4.3.2) Issues and grievances raised by workers and/or their organizations are investigated fairly and objectively</p> <p>4.3.3) There are documented procedures for conflict resolution</p>	<p>4.3.1) The FME shall recognize workers for their policies and actions, the right of free organization in any lawful and legitimate form, in compliance with ILO Convention 87 and guidance from the Ministry of Labour’s guide on “India and the ILO.”</p> <p>4.3.2) The FME shall recognize the right of workers to bargain collectively with their employers, in compliance with ILO Convention 98 and guidance from the Ministry of Labour’s guide on “India and the ILO.”</p> <p>4.3.3) The FME shall have documented procedures to a) investigate objectively and honestly the issues and</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
		discrepancies raised by workers and / or their organizations and b) conflict resolution.
<p>4.4 Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations¹.</p>	<p>4.4.1) Management activities and policies are modified, as appropriate, in response to the results of social impact assessment</p> <p>4.4.2) Forest managers engage in regular communications with neighbors, forest workers, and other stakeholders within the local communities; to the extent practicable, management policies and activities are sensitive to stakeholder concerns and expectations</p> <p>4.4.3) The forest management operation can be fairly characterized as a “good neighbor” within the regional context</p> <p>4.4.4) Forest managers endeavor to keep neighbors and members of the community informed as to planned activities on the defined forest area</p> <p>For FMU’s meeting SLIMF requirements, only the following indicator(s) apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p> <p>4.4.5) Forest managers engage in regular communications with neighbors, forest workers, and other stakeholders within the local communities; to the extent practicable, management policies and activities are sensitive to stakeholder concerns and expectations</p> <p>4.4.6) The forest management operation can be fairly characterized as a “good neighbor” within the regional context</p>	<p>4.4.1) The FME shall conduct a social impact evaluation related to forest management activities.</p> <p>4.4.2) The FME shall document in writing the processes that it will use to interact and consult groups of interest, local communities, and neighbouring properties that could be affected during the planning and implementation of forest management activities.</p> <p>4.4.3) The FME shall demonstrate that the information derived from social impact evaluations and/or consultation processes with stakeholders has been considered and/or addressed in the planning and implementation of forest management activities.</p> <p>For FMU’s meeting SLIMF requirements, only the following indicator(s) of this criterion apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p> <p>4.4.4) The FME shall maintain an up-to-date list of representatives of neighbouring properties or communities that could be affected during and after the implementation of forest management activities.</p> <p>4.4.5) The FME maintains regular communication with neighbours and other stakeholders of local communities. As appropriate, the FME’s policies and activities are sensitive to the interests and expectations of these interested parties.</p>
<p>4.5 Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting</p>	<p>4.5.1) Where they exist and can be established according to bonafide procedures, preferably within legal frameworks, forest managers recognize and respect legal or customary rights that are subject to influence from management activities on the defined forest area</p> <p>4.5.2) Forest managers endeavor, through actions and</p>	<p>4.5.1) Where they exist and can be established according to bonafide procedures, preferably within legal frameworks, forest managers recognize and respect legal or customary rights that are subject to influence from management activities on the defined forest area.</p> <p>4.5.2) Forest managers endeavour, through actions and</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p>	<p>policies, to avoid adverse impacts to the property, resources and/or livelihoods of local peoples 4.5.3) Adequate procedures are employed for resolving grievances and providing fair compensation where forest operations lead to loss or damage to property, resources, livelihoods and/or legal or customary use rights of local peoples</p>	<p>policies, to avoid adverse impacts to the property, resources and/or livelihoods of local peoples. 4.5.3) Adequate procedures are employed for resolving grievances and providing fair compensation where forest operations lead to loss or damage to property, resources, livelihoods and/or legal or customary use rights of local peoples. These procedures should be agreed upon with the parties involved.</p>
	<p>Examples of non-compliance of FSC Criteria and guidelines: There is no written guidelines on safety procedures and use of equipment Contractors’ staff are not accorded the same safety requirements No social impact assessment conducted No maintenance of systematic records of accidents First Aid boxes not properly equipped – often not stocked or with stocked with material past the expiry date. Safety equipments for and safety regulations in all plantation activities including tapping required and made use of and followed. Protective clothing not provided. Rubber tappers and other field workers require training Documentation required of any processes that have occurred vide grievance resolution mechanism – any grievance should, based on evidence, result either in modification of the appropriate management policy or justification for retention of unchanged policy and this should be documented.</p>	<p>Examples of non-compliance of FSC Criteria and guidelines: Implementation of the new regulations must be controlled systematically. A regular control system including the definition of sanctions for non-compliances must be introduced. All controls and results must be documented. The next surveillance audit must be done when the tree harvesting is performed. IMO must be informed of the working program as soon as possible. Reports of all accidents at the work spots – field and processing – must be maintained. Specific actions taken must be recorded separately from other illnesses. The accidents must be analyzed and serve as the basis for any preventive and remedial measures. It was observed that working conditions in some of the rubber processing centres (RPCs) were poor with the structures becoming dilapidated and aged and are functioning at very basic level. Over time, this may lead to negative impacts to worker health and safety, as well as productivity. Helmets, gum boots, first aid boxes, issued to the workers who were found using them. However, the workers were not found to be using the face masks that had been provided by the management as they found it cumbersome to use while working. Safety equipments although provide, workers do not use them – training of workers and making them use these</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
		<p>equipments required.</p> <p>No documentation of procedures for workers grievance. Often these are verbal and not recorded including the resolution of the grievance. This is especially the case with temporary staff.</p> <p>Consultation process the FME employs with stakeholders not recorded.</p> <p>Not undertaken an evaluation of the social impacts of its management practices nor has it undertaken a process of consultation with people and groups directly affected by the management operations</p> <p>No specific procedure to address grievance/compensation when operations lead to loss or damage of property / resources / livelihoods / legal or customary use rights of the local people.</p>

Principle #5: Benefits from the forest

Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>5.1 Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.</p>	<p>5.1.1) The forest operation has sufficient financial capital and human resources to implement the management plan, over the long run</p> <p>5.1.2) The full costs of forest management, including environmental and social costs, are considered and adequately covered by the financial resources of the forest operation</p> <p>5.1.3) Adequate investments of capital, machinery and human resources are made so as to maintain or restore the productive capacity, ecological integrity and socio-economic profile of the define forest area</p> <p>5.1.4) Commercial (income generating) activities are financially viable, given short and medium-term market conditions and costs</p>	<p>5.1.1) The FME has sufficient financial capital and human resources to implement the management plan, over the long run (at least one rotation in the case of plantations).</p> <p>5.1.2) The FME shall conduct a long-term financial projection (e.g., budget) that includes income and environmental, social, and operational costs. The assumptions included in the budget or financial model must be duly substantiated.</p> <p>5.1.3) The FME shall make adequate investments of capital, machinery and human resources so as to maintain or restore the productive capacity, ecological integrity and socio-economic profile of the FMU.</p> <p>5.1.4) Commercial (income generating) activities are financially viable, given short and medium-term market conditions and costs. <i>Verifiers: Annual or semi annual balance sheets or other records that show the costs of management activities conducted, as well as the income received.</i></p>
<p>5.2 Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.</p>	<p>5.2.1) Management and marketing policies, as well as field-level decisions, systematically assure that commercial forest products are being sold for their highest and best uses <i>Examples may include: -new products are explored and developed for common but less used species -access to new markets is explored and developed</i></p> <p>5.2.2) Forest managers strive to diversify the mix of commercial products recovered from the forest and marketed</p> <p>5.2.3) The forest operation has a demonstrated track record</p>	<p>5.2.1) Management and marketing policies, as well as field-level decisions, systematically assure that commercial forest products are being sold for their highest and best uses. <i>Examples may include: -new products are explored and developed for common but less used specie;s -access to new markets is explored and developed.</i></p> <p>5.2.2) The FME strives to diversify the mix of commercial products recovered from the forest and marketed. Examples: · When financially and technically viable, the FME</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
	of favoring or encouraging local processing of wood and latex products	commercializes non-timber forest products (NTFPs); · When financially and technically viable, the FME commercializes environmental services, such as the protection of watersheds that serve hydroelectric dams or forest carbon offsets projects. 5.2.3) The FME has a demonstrated track record of favouring or encouraging local processing of wood, latex, and other forest products.
5.3 Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	5.3.1) Harvesting operations minimize waste and residual stand damage <i>Examples may include: -bumper trees and directional felling techniques are used to minimize unintentional tree damage</i> 5.3.2) Yarding and log sorting operations minimize product wastage, degrade and foregone revenue opportunities. 5.3.3) Log landings are kept to a minimum practicable number and size and are located so as to minimize adverse environmental impacts 5.3.4) Where on-site processing takes place, the footprint of the milling facility is kept to the smallest practicable size; the processing facilities are located in the most environmentally benign locales as well as in locations where losses to productive forest area are minimized 5.3.5) While minimizing undue waste, forest managers establish field guidelines that recognize the ecological value of biomass (e.g., tops and branches) being left on site; forest managers have written guidelines for retention of downed woody debris and standing snags within harvest areas	5.3.1) Harvesting operations minimize waste and residual stand damage <i>Examples may include: -bumper trees and directional felling techniques are used to minimize unintentional tree damage.</i> 5.3.2) Yarding and log sorting operations minimize product wastage, de-grade and foregone revenue opportunities. 5.3.3) Log landings are kept to a minimum practicable number and size and are located so as to minimize adverse environmental impacts. 5.3.4) Where on-site processing takes place, the footprint of the milling facility is kept to the smallest practicable size; the processing facilities are located in the most environmentally benign locales as well as in locations where losses to productive forest area are minimized. <i>Examples may include: -the FME locates charcoal kilns or portable sawmills only after evaluating the environmental impacts of the selected sites.</i> 5.3.5) While minimizing undue waste, forest managers establish field guidelines that recognize the ecological value of biomass (e.g., tops and branches) being left on site; forest managers have written guidelines for retention of downed woody debris and standing snags within harvest areas. <i>Verifier: ·Written field guidelines for the biomass retention (snags, tops, and downed woody debris).</i>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>5.4 Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	<p>5.4.1) Forest managers can demonstrate their efforts to diversify the mix of commercial products recovered from the forest and marketed</p> <p>5.4.2) Forest managers can demonstrate efforts taken to encourage local value-added processing</p> <p>5.4.3) Where market opportunities exist and where such use does not compromise the ecological health of the forest, the marketing of non-timber forest products is undertaken by forest managers</p> <p><i>Examples may include: -compatible uses such as recreation, ecotourism, hunting, fishing, rubber harvesting, Christmas tree cutting, etc.</i></p>	<p>5.4.1) The FME can demonstrate its efforts to diversify the mix of commercial products recovered from the forest and marketed.</p> <p>5.4.2) The FME can demonstrate efforts taken to encourage local value-added processing.</p> <p>5.4.3) Where market opportunities exist and where such use does not compromise the ecological health of the forest, the marketing of non-timber forest products is undertaken by forest managers.</p> <p><i>Examples may include: -compatible uses such as recreation, ecotourism, hunting, fishing, rubber harvesting, Christmas tree cutting, etc.</i></p>
<p>5.5 Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p>	<p>5.5.1) The management plan addresses the full range of forest services associated with the defined forest area including: municipal watersheds, commercial and recreational fisheries (or the supply of water to downstream fisheries), visual quality, contributions to regional biodiversity, recreation and tourism</p> <p>5.5.2) Timber management activities are designed and implemented, spatially and temporally, with due consideration to the impacts on other forest services</p> <p>5.5.3) Forest managers demonstrate an awareness of and sensitivity to non-timber forest services, many of which may not generate income</p> <p>5.5.4) Forest managers engage in regular dialogue with stakeholders and advocates of forest services that are subject to impact from forest operations</p>	<p>5.5.1) The management plan addresses the full range of forest services associated with the FMU including: municipal watersheds, commercial and recreational fisheries (or the supply of water to downstream fisheries), visual quality, contributions to regional biodiversity, recreation and tourism as identified by the FME.</p> <p>5.5.2) Forest management activities are designed and implemented, spatially and temporally, with due consideration to the impacts on the forest services identified in 5.5.1.</p> <p>5.5.3) The FME demonstrates an awareness of and sensitivity to non-timber forest services, many of which may not generate income.</p> <p>5.5.4) The FME engages in regular dialogue with stakeholders and advocates of forest services that are subject to impact from forest operations.</p>
<p>5.6 The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p>	<p>5.6.1) Appropriate to the scale of operations and the frequency of commercial activity, timber harvesting is guided by a timber management plan that includes a calculated periodic allowable harvest</p> <p>5.6.2) Average annual harvests do not exceed the calculated</p>	<p>5.6.1) For natural forest management operations, the annual allowable cut (AAC) of forest products, either by area or volume, shall be established by a combination of empirical data and published literature, based on conservative, well-documented growth and yield estimates to ensure that the</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
	<p>allowable harvest Note: Non-conformance to this Indicator constitutes a Major Failure and precludes award of certification until appropriately corrected.</p> <p>5.6.3) Appropriate to the scale of operations and the frequency of commercial activity, estimates of total periodic timber growth on the defined forest area—by species categories—are generated through a combination of empirical data and published literature; growth estimates are conservative</p> <p>5.6.4) Harvest levels shall be set such that inventories of desired species increase over time, unless it is established (in the management plan) that current inventories (measured in average standing volume per hectare) exceed optimal levels</p> <p>5.6.5) For operations entailing regular annual harvesting, the 10-year rolling average harvest level does not exceed average annual increment</p> <p>5.6.6) For smaller operations that do not harvest annually, the frequency and intensity of harvest entries is set such that inventory levels are allowed to recover—and increase, as appropriate—between entries</p> <p>5.6.7) For operations harvesting non-timber forest products such as rubber, management strategies incorporate the best available monitoring and inventory data to calculate a sustainable rate of harvest; harvest of non-timber forest products is also subject to Indicator 5.6.2.</p>	<p>rate of harvest does not exceed the calculated rates of long-term regeneration.</p> <p>5.6.2) Average annual harvests shall not exceed the calculated AAC. Note: Non-conformance to this indicator constitutes a Major Failure and precludes award of certification until appropriately corrected.</p> <p>5.6.3) For plantation forest management, the growth and harvest rates (for thinning and final cuts), shall be based on well-documented information and/or field trials, and be consistent with the observed behaviour of the species at the national or regional level.</p> <p>5.6.4) Harvest levels shall be set such that inventories of desired species increase over time, unless it is established (in the management plan) that current inventories (measured in average standing volume per hectare) exceed optimal levels.</p> <p>5.6.5) For operations entailing regular annual harvesting, the 10-year rolling average harvest level does not exceed average annual increment. <i>Verifiers: Comparison of records of harvested volume by species (or species groups) with the AAC established for the species (or species groups).</i></p> <p>5.6.6) For smaller operations that do not harvest annually, the frequency and intensity of harvest entries is set such that inventory levels are allowed to recover—and increase, as appropriate—between entries. <i>Verifiers: Comparison of records of harvested volume by species (or species groups) with the AAC established for the species (or species groups).</i></p> <p>5.6.7) For operations harvesting non-timber forest products such as rubber, management strategies incorporate the best available monitoring and inventory data to calculate a conservative growth and harvest rates; harvest of non-timber forest products is also subject to Indicator 5.6.2.</p> <p>5.6.8) For timber investment¹ management programs: If growth projections are used to make claims on the rate of financial return, the FME shall include a visible declaration</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
		<p>on all material that carries the FSC or certification body trademarks regarding the responsibility of financial claims (e.g., “the FSC and SCS are not responsible for, and do not endorse, any financial or profit claims made by the timber investment organization.”) (See FSC-TMK-50-201, V1.0, section 16).</p>
	<p><i>Examples of non-compliance of FSC Criteria and guidelines.</i> No SOP written for the protection of water catchment sites within the FMU. Management and marketing policies should ascertain highest commercially obtainable value for timber. Extended time between uprooting of previous tree crop and replanting should be minimized to prevent loss of produce, soil erosion (sufficient precautions often not taken when land is left with no crop), and increase in management for field clearing operations. Scientific felling procedures not in place – these should be communicated with contractors also.</p>	<p><i>Examples of non-compliance of FSC Criteria and guidelines.</i> The FME is fully independent and a profit making entity with sufficient financial capital and required sanctioned staff strength. However, although sufficient staff strength is sanctioned to not only implement management plans but also to take up expansion of its activities, it is observed that at present more than 50% of the same are vacant. Plans for increasing outputs would necessitate engaging more workers and staff besides filling above vacancies to maintain and to add to its profitability. FME has not taken into account the full social and environmental costs of the management operations which have definite impact on the financial projections. E.g., effect on wage rates and availability of trained manpower, area under green cover, effect of effluents from latex factories on downstream agriculture, cost of ETP operations etc. Field level sanitation was poor. Although felling and field clearing operations were completed and replanting also had taken place, in many instances the timber had not yet been removed from the fields and was decaying beyond salvage in the heavy monsoon rains.</p>

Principle #6: Environmental impact

Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>6.1 Assessment of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</p>	<p>6.1.1) Project (site)-level environmental impact assessments, scaled to the size and complexity of operations, are systematically completed prior to commencement of site disturbing activities</p> <p>6.1.2) In addition to project-level assessments, forest managers also complete landscape- level environmental impact assessments in which the cumulative effects of forest operations are considered</p> <p>6.1.3) To provide background for environmental impact assessments, the regional, sub- regional, and landscape environmental context of the defined forest area is established and documented (preferably in the management plan), consistent with the scale and intensity of operations</p> <p>6.1.4) Planned management activities are appropriately modified based upon the results of the environmental impact assessments</p> <p>For FMU’s meeting SLIMF requirements, only the following indicator(s) apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p> <p>6.1.5) The forest operation demonstrates knowledge of the possible negative impacts of its activities and seeks to minimize them.</p>	<p>6.1.1) Project (site)-level environmental impact assessments, scaled to the size and complexity of operations, are systematically completed prior to commencement of site disturbing activities.</p> <p>6.1.2) In addition to project-level assessments, forest managers also complete landscape-level environmental impact assessments in which the cumulative effects of forest operations are considered. <i>Examples may include: - the FME does not conduct clearcuts next to adjacent previous clearcut harvests unless these previous harvests have adequate regeneration.</i></p> <p>6.1.3) To provide background for environmental impact assessments, the regional, sub- regional, and landscape environmental context of the FMU is established and documented (preferably in the management plan), consistent with the scale and intensity of operations.</p> <p>6.1.4) Planned management activities are appropriately modified based upon the results of the environmental impact assessments.</p> <p>For FMU’s meeting SLIMF requirements, only the following indicator(s) of this criterion apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p> <p>6.1.5) The FME demonstrates knowledge of the possible negative impacts of its activities and implement measures to minimize them.</p>
<p>6.2 Safeguards shall exist which protect rare, threatened and endangered</p>	<p>6.2.1) Forest managers forge positive and collaborative working relationships with pertinent officials from local, state and federal agencies charged with enforcing endangered</p>	<p>6.2.1) Using the best information available and the results of field surveys, the FME shall identify the potential presence of rare, threatened or endangered (RTE) species (see</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping and collecting shall be controlled.</p>	<p>species statutes 6.2.2) “Listed” species, their habitats, and sites with unusually high species and/or ecosystem diversity are identified through field surveys or other sources and are protected or managed at a level sufficient to ensure that viable populations are maintained or restored; the level of effort should be scaled to the size and complexity of the forest operation 6.2.3) Field employees are trained in the recognition of endangered species and their habitats 6.2.4) Areas of critical habitat for listed species are duly delineated, appropriately managed, and recorded on maps of appropriate scale 6.2.5) Illegal and inappropriate hunting, fishing, trapping, or collecting of rare, threatened, or endangered species is controlled and minimized For FMU’s meeting SLIMF requirements, only the following indicator(s) apply; the indicator(s) are not to be used for assessing non-SLIMF operations: 6.2.6) Measures are in place to control illegal and inappropriate hunting, fishing, trapping, and collecting 6.2.7) Where information exists on rare, threatened and endangered species and their habitats, the forest manager uses this information to map and protect them. 6.2.8) Habitat features that are important for conservation are identified and protected.</p>	<p>Appendix 3) and their habitats within the FMU (e.g., nesting and feeding areas). 6.2.2) The FME shall establish, appropriate to the scale and intensity of the operation, conservation zones and/or other adequate protection measures for RTE species and their habitats. These conservation zones and other protection measures shall be described in the management plan. 6.2.3) The FME shall demarcate RTE conservation zones on maps, and when appropriate and it does not interfere with conservation objectives, in the field. These zones shall be respected in forest management activities. 6.2.4) The FME shall not harvest species that are included in Appendix I of CITES (also applicable to SLIMF). 6.2.5) The FME shall have adequate control over and minimize illegal, unauthorized and/or inappropriate activities, such as hunting, fishing, trapping, harvesting of NTFPs or the collecting of RTE species (also applicable to SLIMF). <i>Examples may include: -Fences are installed to control grazing when appropriate; -Established hunting or gathering seasons are respected in order to allow for reproduction.</i> For FMU’s meeting SLIMF requirements, only 6.2.4, 6.2.5, and the following indicator(s) of this criterion apply; the following indicator(s) are not to be used for assessing non-SLIMF operations: 6.2.6) Where information exists on RTE species and their habitats, the FME uses this information to map and protect these resources. 6.2.7) The use of fire is controlled within the FMU and the FME helps in its prevention and control in contiguous areas.</p>
<p>6.3 Ecological functions and values shall be maintained intact, enhanced,</p>	<p>6.3.1) Known ecological functions and values are described in the management plan and updated periodically as additional information/knowledge is acquired; forest managers take</p>	<p>6.3.1) Known ecological functions and values are described in the management plan and updated periodically as additional information/knowledge is acquired; the FME</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p>	<p>affirmative steps to eliminate gaps in information and knowledge about ecological functions within the defined forest area 6.3.2) Subject to the scale of operations, the forest is managed so as to maintain a full range of successional stages at distributions within the range of natural variability 6.3.3) The management plan incorporates principles of landscape and ecosystem-based planning; the plan contains goals pertaining to biological diversity for the range of spatial scales from genetic diversity to landscape diversity 6.3.4) Harvesting prescriptions maintain, enhance or restore natural forest composition; management is aimed at maintaining all naturally occurring species 6.3.5) Harvesting is designed and laid out, over time and space, with consideration of the types, sizes and frequency of natural disturbances as well as connectivity of wildlife habitats 6.3.6) Regeneration after final harvests are timely and successful; young stands, either planted or naturally established, are well-stocked with desired species, vigorous and on the trajectory to healthy merchantable stands</p>	<p>takes affirmative steps to eliminate gaps in information and knowledge about ecological functions within the FMU. 6.3.2) Subject to the scale of operations, the forest is managed so as to maintain a full range of successional stages at distributions within the range of natural variability. 6.3.3) The management plan incorporates principles of landscape and ecosystem- based planning; the plan contains goals pertaining to biological diversity for the range of spatial scales from genetic diversity to landscape diversity. 6.3.4) Harvesting prescriptions maintain, enhance or restore natural forest composition; management is aimed at maintaining all naturally occurring species. 6.3.5) Harvesting is designed and laid out, over time and space, with consideration of the types, sizes and frequency of natural disturbances as well as connectivity of wildlife habitats. 6.3.6) Regeneration after final harvests are timely and successful; young stands, either planted or naturally established, are well-stocked with desired species, vigorous and on the trajectory to healthy merchantable stands.</p>
<p>6.4 Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	<p>6.4.1) Forest managers review the amount of representative samples of existing ecosystems protected within the regional landscape 6.4.2) Where deficiencies exist within the landscape, forest managers take actions to make contributions to the network. 6.4.3) Protected areas within the defined forest area are delineated on maps and protection policies are included in the management plan For FMU’s meeting requirements, only the following indicator(s) apply; the indicator(s) are not to be used for assessing non-SLIMF operations: 6.4.4) Representative samples of ecosystems are identified, recorded on maps, and excluded from the harvesting area. If</p>	<p>6.4.1) The FME compiles and reviews information on the amount of representative samples of existing ecosystems protected within the regional landscape, both within and outside of the FMU. 6.4.2) Where deficiencies (i.e., opportunities to protect and restore the extent of certain representative sample ecosystems) exist within the landscape, the FME takes actions to make contributions to the regional network. <i>Verifiers:</i> · <i>Information on regional protected areas, such as national parks, is reviewed and analyzed in the management plan.</i> · <i>The FME documents and takes measures to prevent</i></p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
	<p>existing representative samples of ecosystems are already adequately protected on other private or public properties within the region then no additional samples need to be identified and protected</p>	<p><i>adverse effects to protected areas.</i> 6.4.3) Protected areas within the FMU are delineated on maps and protection policies are included in the management plan. For FMU’s meeting requirements, only the following indicator(s) apply; the indicator(s) are not to be used for assessing non-SLIMF operations: 6.4.4) Representative samples of ecosystems are identified, recorded on maps, and excluded from the harvesting area. If existing representative samples of ecosystems are already adequately protected on other private or public properties within the region then no additional samples need to be identified and protected.</p>
<p>6.5 Written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources.</p>	<p>6.5.1) The management plan, or another pertinent policy document, contains express written guidelines for effectively minimizing soil erosion and damage to forest vegetation as a result of site disturbing activities 6.5.2) The management plan, or another pertinent policy document, contains provisions for protecting water resources (e.g., stream courses and adjoining riparian areas, wetlands, seeps and springs) found within the defined forest area 6.5.3) Forest managers and forest workers demonstrate a working knowledge of these protection guidelines and, in fact, systematically implement them in day-to-day operations 6.5.4) All watershed, riparian, and aquatic features are identified, classified, and mapped 6.5.5) Road construction, maintenance and closure standards are followed in the field; road surfaces are well drained, culverts are large enough to accommodate peak flow, and water bars are appropriately installed 6.5.6) Areas with extremely unstable slopes or at high risk of landslides are not logged</p>	<p>6.5.1) The management plan, or another pertinent policy document, contains express written guidelines for the protection of water resources (e.g., stream courses and adjoining riparian areas, wetlands, seeps and springs) found within the FMU and minimization of soil erosion and damage to forest vegetation as a result of site disturbing activities. 6.5.2) Prior to conducting site disturbing activities, the FME shall prepare maps, of sufficient scale and detail, in which primary and secondary roads, skid trails, landings, large drainage structures, watercourse crossings, buffer zones, and conservation areas are identified. 6.5.3) The FME and its contractors use the maps in the planning and implementation of management activities and demonstrate a working knowledge of the protection guidelines from 6.5.1 and, in fact, systematically implement them in day-to-day operations. 6.5.4) The FME shall have written guidelines for the construction, maintenance, and closure of roads within the FMU.</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
		<p>6.5.5) Road construction, maintenance and closure standards are followed in the field; road surfaces are well drained, culverts are large enough to accommodate peak flow, and water bars are appropriately installed.</p> <p>6.5.6) The FME does not log areas with extremely unstable slopes or at high risk of landslides and avoids inappropriate site disturbing activities in these areas.</p>
<p>6.6 Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>	<p>6.6.1) All chemical pesticide use occurs within the context of an integrated pest management program; pesticides are only used when non-chemical management has been proven ineffective</p> <p>6.6.2) A complete and up-to-date list of all chemical pesticides used on the defined forest area shall be maintained and made available to the SCS auditor(s); no chemicals prohibited under criterion 6.6 are used unless a formal derogation has been granted by the FSC Note: Non-conformance to this Indicator constitutes a Major Failure and precludes award of certification until appropriately corrected.</p> <p>6.6.3) All pesticide use is guided by site-specific written prescriptions designed to avoid human and environmental hazard and to maximize efficacy of use</p> <p>6.6.4) Field personnel applying pesticides are properly licensed (where applicable) and trained; appropriate equipment and gear to assure safe application is used by field personnel</p> <p>6.6.5) Forest managers demonstrate a commitment to reducing, and in due course eliminating, planned reliance upon chemical pesticides</p>	<p>6.6.1) All chemical pesticide use in nurseries, FMUs or processing facilities occurs within the context of an integrated pest management program; pesticides are only used when non-chemical management has been proven ineffective or cost-prohibitive.</p> <p><i>Verifiers:</i></p> <ul style="list-style-type: none"> · <i>Silvicultural prescriptions are selected and designed to minimize the dependence on chemical pesticides;</i> · <i>The FMU can demonstrate evidence of reduction or elimination of the use of chemical pesticides over time.</i> <p>6.6.2) If the FME uses chemical pesticides: ·</p> <ul style="list-style-type: none"> The FME shall have a complete list of chemical pesticides used; · The FME shall maintain records of all pesticides used, including the name of the product, active ingredient(s), location and method of application, total quantity applied, and the dates of application; · The FME shall comply with all safety regulations during the transport, manipulation, application, and storage of chemical pesticides; · Where required by law, field personnel shall be properly licensed to apply chemical pesticides; · FME personnel and contractors shall use appropriate equipment and gear to assure safe application; The FME shall provide adequate supervision and training to personnel and contractors related to the

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
		<p>transport, storage, manipulation, and application of chemical pesticides.</p> <p>6.6.3) The FME shall not use highly hazardous chemical pesticides as defined by the FSC (FSC-POL-30-601), those prohibited in India, pesticides classified as Type 1A or 1B by the World Health Organization (WHO) or pesticides composed of hydrocarbons or chlorine. Exceptions are made when the FSC has permitted a formal derogation in the applicable territory. In such cases, the FME shall follow the terms of the approved derogation. Note: Non-conformance to this Indicator constitutes a Major Failure and precludes award of certification until appropriately corrected.</p>
<p>6.7 Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</p>	<p>6.7.1) Toxic chemicals and their containers are disposed of, off site, in an environmentally sound and legal manner</p> <p>6.7.2) There are contingency plans and procedures for prevention and cleanup following spills or other accidents involving chemical pesticides, oils and fuels</p> <p>6.7.3) There are on-site facilities for secure collection of waste, including oil and fuel</p>	<p>6.7.1) Toxic chemicals and their containers are disposed of, off site, in an environmentally sound and legal manner.</p> <p>6.7.2)The FME shall have contingency plans and procedures for prevention and cleanup following spills or other accidents involving chemical pesticides, oils, fuels, and other chemicals.</p> <p>6.7.3) There are on-site facilities for secure collection of waste, including oil and fuel.</p>
<p>6.8 Use of biological control agents shall be documented, minimized, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</p>	<p>6.8.1) There shall be no use (defined as commercial use as well as research) of genetically modified organisms within the defined forest area Note: Non- conformance to this Indicator constitutes a Major Failure and precludes award of certification until appropriately corrected.</p> <p>6.8.2) All use of biological control agents takes place within the context of an integrated pest management program that will document, minimize, monitor, and strictly control their application</p> <p>6.8.3) Use of biological control agents takes place only where demonstrably necessary and only under strict protocols in compliance with applicable laws and regulations</p>	<p>6.8.1) There shall be no use (defined as commercial use as well as for research purposes) of genetically modified organisms within the FMU. Note: Non- conformance to this Indicator constitutes a Major Failure and precludes award of certification until appropriately corrected.</p> <p>6.8.2) All use of biological control agents takes place within the context of an integrated pest management program that will document, minimize, monitor, and strictly control their application.</p> <p>6.8.3) Use of biological control agents takes place only where demonstrably necessary and only under strict protocols in compliance with applicable laws and</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>6.9 The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</p>	<p>6.9.1) Exotic species (tree species as well as other flora and fauna) are introduced into the defined forest area only after active investigation demonstrates that they are not invasive 6.9.2) Exotic species use is governed by written guidelines for controlling off-site regeneration; active ongoing monitoring is mandatory 6.9.3) In areas where invasive exotic plants are problematic, forest owners or managers develop and implement appropriate control measures</p>	<p>regulations.</p> <p>6.9.1) Exotic species (tree species as well as other flora and fauna) are introduced into the defined forest area only after active investigation demonstrates that they are not invasive. 6.9.2) Exotic species use is governed by written guidelines for controlling off-site regeneration; active ongoing monitoring is mandatory. <i>Verifier:</i> · <i>Control and monitoring of exotic species is included in the management plan (C7.1) and monitoring program (C8.1).</i> 6.9.3) In areas where invasive exotic plants are problematic, the FME develops and implements appropriate control measures</p>
<p>6.10 Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) entails a very limited portion of the forest management unit; and b) does not occur on high conservation value forest areas; and c) will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit.</p>	<p>6.10.1) No more than 5% of the defined forest area has (since 1994) or will be converted to non-forest land or plantations (as defined by the FSC) 6.10.2) Areas of high conservation value are not being converted to plantations or non-forest land 6.10.3) Forest managers are able to demonstrate the conservation long-term benefits of converting portions of the defined forest area to plantations or non-forest land.</p>	<p>6.10.1) The FME shall not convert forests or threatened non-forested habitats to plantations or other non-forest land uses, except when the conversion complies with indicators 6.10.2 to 6.10.5. 6.10.2) If there is conversion, this shall not exceed 5% of the FMU during any given period of 5 years and this conversion shall have the backing of the responsible government agencies and the support of social and environmental stakeholders (See FSC-ADV-30-602). 6.10.3) If the FME has the intention of creating plantations or converting to other non-forested land uses in forests or savannahs, the FME shall supply written, verbal or visual guidelines to its staff for the identification of acceptable areas and implement technically appropriate management practices. 6.10.4) Plantations or conversion to non-forested land uses shall not occur in High Conservation Value Forests or Areas. 6.10.5) The FME shall demonstrate the long-term conservation benefits of converting portions of the FMU to plantations or non-forest land.</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
		<p><i>Examples may include: -The installation of a charcoal kiln allows for the use of small woody residues, which can be proven to improve the conditions for the regeneration of some commercial species. -The construction of a look-out tower to detect illegal logging or forest fires.</i></p> <p>6.10.6) The FME shall not conduct activities that contribute to the destruction or substantial alteration of natural forest, or other natural ecosystem types, in areas outside of the FMU under evaluation.</p>
	<p><i>Examples of non-compliance of FSC Criteria and guidelines.</i></p> <p>An EIA report has not been written for the FMU. Site specific assessment of potential Environmental impact not carried out prior to disturbance. EIA report should take into consideration the cumulative effect of various Ground inventories of the natural resources especially rare, threatened and endangered species and their habitats had not been initiated or has been done only for a portion of the plantation and not all FMU. Permanent Sample Plots (PSP) have been established but are not sufficient in size or number to document these species. A contingency plan for possible spillage of fuel and chemicals not written The management plan does not incorporate principles of landscape and ecosystem planning. Written guidelines defining acceptable practice for all operations not available. External agencies and experts not consulted while identifying and delineating extent of land allocated for conservation zone and protected areas. Guidelines are not available for all acceptable practice such as road construction, maintenance of culverts, drainage and uprooting on steep or sensitive sites</p>	<p><i>Examples of non-compliance of FSC Criteria and guidelines.</i></p> <p>All appropriate State Pollution Control Board approvals should be got for ETP and other pollution control mechanisms implemented. Rare, endangered and threatened fauna must be identified and a concept for the protection of endangered species must be formulated. Information about rare and endangered species (plant and animal) must be available for all workers and field staff. Training on identification and protection is needed. The diversity of each stand must be increased. A clear concept of how to reach this goal and the percentages of native species must be developed. Protection zones along watercourses must be developed. Natural regeneration of native species must be protected in order to increase biodiversity and ecological functions. Clear instruction to protect these species must be given to workers. All used chemicals must comply with the FSC standard. The chemicals used by third parties must be authorized by FME prior to the application. An evaluation of the possible environmental impacts of its activities has not been conducted</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
	<p>It is suggested field note book used by field officers may include environmental observations</p> <p>Very old plantations are unlikely to have many Rare, threatened and endangered species, but it is suggested that field officers may monitor endangered species occurring inside the estate.</p> <p>Most of the streams that were observed in the plantation were less than 15ft wide and there are no specifications regarding the buffer zone for such areas. Also, there is no clarity regarding the status of the rubber trees existing within these buffer zones once they have completed their economic life cycle. Similarly, clarity on status of old rubber trees in areas where the terrain is steep.</p> <p>The company was using chemicals like Chlorpyrifos, Paraquat dichloride, Mancozeb and Oxyflorfen which are banned as per the FSC list of hazardous chemicals.</p>	

Principle #7: Management plan

A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long term objectives of management, and the means of achieving them, shall be clearly stated.

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>7.1 The management plan and supporting documents shall provide:</p> <p>a) Management objectives.</p> <p>b) Description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</p> <p>c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.</p> <p>d) Rationale for rate of annual harvest and species selection.</p> <p>e) Provisions for monitoring of forest growth and dynamics.</p> <p>f) Environmental safeguards based on environmental assessments.</p> <p>g) Plans for the identification and protection of rare, threatened and endangered species.</p> <p>h) Maps describing the forest resource base including protected areas, planned management</p>	<p>7.1.1) 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, above, Note: Non-conformance to this Indicator constitutes a Major Failure and precludes award of certification until appropriately corrected.</p> <p>7.1.2) The management plan contains both long term goals and objectives as well as short and near term tactical direction</p> <p>7.1.3) There are sufficient resources invested in plan development so as to produce a functional and effective management plan For FMU's meeting SLIMF requirements, only the following indicator(s) apply; the indicator(s) are not to be used for assessing non-SLIMF operations: A written management plan exists and is implemented. The management plan includes at least the following:</p> <p>a) the objectives of management</p> <p>b) a description of the forest</p> <p>c) how the objectives will be met,</p> <p>d) harvesting methods and silviculture (clear cuts, selective cuts, thinnings) to ensure sustainability</p> <p>d) sustainable harvest limits (which must be consistent with FSC criteria 5.6)</p> <p>e) plans for monitoring forest growth</p> <p>f) environmental/ social impacts of the plan</p> <p>g) conservation of rare species and any high conservation</p>	<p>7.1.1) 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, above, 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. Note: Non-conformance to this Indicator constitutes a Major Failure and precludes award of certification until appropriately corrected.</p> <p>7.1.2) The management plan contains both long term goals and objectives as well as short and near term tactical direction.</p> <p>7.1.3) There are sufficient resources invested in plan development so as to produce a functional and effective management plan. For FMU's meeting SLIMF requirements, only the following indicator(s) of this criterion apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p> <p>7.1.4) A written management plan exists and is implemented. The management plan includes at least the following:</p> <p>a) the objectives of management;</p> <p>b) a description of the forest;</p> <p>c) how the objectives will be met, harvesting methods and silviculture (clear cuts, selective cuts,</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>activities and land ownership. i) Description and justification of harvesting techniques and equipment to be used.</p>	<p>values h) maps of the forest, showing protected areas, planned management and land ownership i) Pest and weed control planned j) Duration of the plan</p>	<p>thinnings) to ensure sustainability; d) sustainable harvest limits (which must be consistent with FSC criteria 5.6) e) plans for monitoring forest growth; f) environmental/ social impacts of the plan; g) conservation of rare species and any high conservation values; h) maps of the forest, showing protected areas, planned management and land ownership; i) Pest and weed control planned; j) Duration of the plan.</p>
<p>7.2 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 circumstances.</p>	<p>7.2.1) The management plan is revised and updated at regular intervals, the frequency of which is appropriate to the scale and intensity of operations 7.2.2) Forest managers maintain conversancy in emerging scientific and technical information pertinent to the management of the defined forest area 7.2.3) Over time, the management plan is kept current and relevant; as such, the plan is able to provide ongoing guidance to the management of the defined forest area For FMU's meeting SLIMF requirements, only the following indicator(s) apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p>	<p>7.2.1) The management plan is revised and updated at regular intervals, the frequency of which is appropriate to the scale and intensity of operations. 7.2.2) The FME shall incorporate the results of monitoring or new scientific or technical information (e.g., silvicultural, environmental, social, and economic conditions) in the revision or adjustment of the management plan, appropriate to the scale and intensity of operations. 7.2.3) Over time, the management plan is kept current and relevant; as such, the plan is able to provide ongoing guidance to the management of the defined forest area. For FMU's meeting SLIMF requirements, only the following indicator(s) of this criterion apply; the indicator(s) are not to be used for assessing non-SLIMF operations: 7.2.4) The management plan is revised and updated at regular intervals, the frequency of which is appropriate to the scale and intensity of operations.</p>
<p>7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation</p>	<p>7.3.1) Appropriate to the scale and intensity of operations, there is a documented protocol by which forest workers (including subcontractors and rubber tappers) are duly</p>	<p>7.3.1) Appropriate to the scale and intensity of operations, there is a documented protocol by which forest workers (including subcontractors and rubber</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
of the management plan.	<p>trained as to their role in implementing the management plan</p> <p>7.3.2) Records are maintained as to when each forest worker received management plan training</p> <p>7.3.3) There is a demonstrable track record of compliance with and implementation of the management plan</p> <p>7.3.4) Forest workers are supervised by qualified managers who provide guidance in the implementation of the management plan.</p> <p>For FMU’s meeting SLIMF requirements, only the following indicator(s) apply:</p> <p>7.3.5) Appropriate to the scale and intensity of operations, forest workers (including subcontractors and rubber tappers) are duly trained, according to a documented protocol, as to their role in implementing the management plan</p>	<p>tappers) are duly trained as to their role in implementing the management plan.</p> <p>7.3.2) Records are maintained as to when each forest worker received management plan training.</p> <p>7.3.3) There is a demonstrable track record of compliance with and implementation of the management plan.</p> <p>7.3.4) Forest workers are supervised by qualified managers who provide guidance in the implementation of the management plan.</p> <p>For FMU’s meeting SLIMF requirements, only the following indicator(s) apply:</p> <p>7.3.5) Appropriate to the scale and intensity of operations, forest workers (including subcontractors and rubber tappers) are duly trained, according to a documented protocol, as to their role in implementing the management plan.</p>
7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	<p>7.4.1) Interested stakeholders are readily able to obtain a public summary of the management plan, which provides information on the primary elements of the plan, including those enumerated in criterion 7.1</p> <p>7.4.2) The public summary is appropriate to the scale and intensity of operations</p> <p>7.4.3) The public summary is updated periodically, at a frequency appropriate to the scale and intensity of operations</p> <p>For FMU’s meeting SLIMF requirements, only the following indicator(s) apply:</p> <p>7.4.4) Interested stakeholders are readily able to obtain a public summary of the management plan</p>	<p>7.4.1) Interested stakeholders are readily able to obtain a public summary of the management plan, which provides information on the primary elements of the plan, including those enumerated in criterion 7.1.</p> <p>7.4.2) The public summary is appropriate to the scale and intensity of operations.</p> <p>7.4.3) The public summary is updated periodically, at a frequency appropriate to the scale and intensity of operations.</p> <p>For FMU’s meeting SLIMF requirements, only the following indicator(s) apply. These indicators cannot be used to evaluate non-SLIMF operations:</p> <p>7.4.4) Interested stakeholders are readily able to obtain a public summary of the management plan.</p> <p>7.4.5) The FME shall update all public summaries at least one time during the period of validity of the forest</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
		management certificate (5 years).
	<p>Examples of non-compliance of FSC Criteria and guidelines. Long term goals and objectives not clearly defined The Forest Management Plan and the estate operation plan presented during the assessment do not provide the complete set of information specified in the criterion (C 7.1). Do not have a formal system to monitor the performance of uprooting contractors to comply with contract specifications. Training records not maintained.</p>	<p>Examples of non-compliance of FSC Criteria and guidelines. Management plan does not mention the long term goals and objectives nor the short and near term direction of estate. A formal management plan must be complied with from all the various individual documents. An annual public summary about the management plan of the plantation must be made available on demand. An internal training concept for workers must define which qualification and training is required for which work.</p>

Principle #8: Monitoring and assessment

Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>8.1 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.</p>	<p>8.1.1) Appropriate to the scale and intensity of operations, there are written protocols for periodic monitoring of forest conditions, management activities, plan compliance and chain-of-custody</p> <p>8.1.2) Forest managers have a demonstrated track record of implementing monitoring protocols which are consistent and replicable over time</p> <p>For FMU’s meeting SLIMF requirements, only the following indicator(s) apply:</p> <p>8.1.3) Appropriate to the scale and intensity of operations, periodic monitoring of forest conditions, management activities, plan compliance and chain-of-custody is conducted, and done so according to written protocols.</p>	<p>8.1.1) Appropriate to the scale and intensity of operations, there are consistent and replicable procedures for the periodic monitoring of forest conditions, management activities, management plan compliance and chain-of-custody.</p> <p>8.1.2) The frequency and intensity of monitoring shall be based on the scale and intensity of the operation, as well as the fragility of the resources to be managed.</p> <p>8.1.3) Forest managers have a demonstrated track record of implementing monitoring protocols which are consistent and replicable over time.</p> <p>For FMU’s meeting SLIMF requirements, only the following indicator(s) apply:</p> <p>8.1.4) Appropriate to the scale and intensity of operations, periodic monitoring of forest conditions, management activities, management plan compliance and chain-of-custody is conducted, and done so according to written protocols.</p>
<p>8.2 Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:</p> <p>a) Yield of all forest products harvested. b) Growth rates, regeneration and condition of the forest. c) Composition and observed changes in the flora</p>	<p>8.2.1) Appropriate to the scale and intensity of operations, forest managers periodically gather information on the indicators enumerated in this criterion, above</p> <p>8.2.2) Written records are kept of the annual or periodic harvest levels of each commercial forest product, at levels of specificity appropriate to the scale and intensity of operations</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> · <i>Records of timber harvest volume by species</i> · · <i>Records of rubber collection or latex production by</i> 	<p>8.2.1) Appropriate to the scale and intensity of operations, the FME’s monitoring plan shall include protocols to periodically gather information on components a) – e) enumerated in this criterion, above.</p> <p>8.2.2) Written records shall be kept of the annual or periodic harvest levels of each commercial forest product, at levels of specificity appropriate to the scale and intensity of operations</p> <p><i>Examples may include: -Records of timber harvest volume by species; -Records of rubber collection or latex production by</i></p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>and fauna. d) Environmental and social impacts of harvesting and other operations. e) Costs, productivity, and efficiency of forest management.</p>	<p><i>volume</i></p> <p>8.2.3) Forest managers demonstrate a commitment to acquiring and utilizing information on key indicators pertaining to the production, environmental and socio-economic profiles of their operation For FMU’s meeting SLIMF requirements, only the following indicator(s) apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p> <p>8.2.4) Appropriate to the scale and intensity of operations, forest managers periodically gather information on the indicators enumerated in this criterion, above</p> <p>8.2.5) Information necessary to judge progress towards management objectives is collected and recorded. In all cases this will include: § Amount of all commercial forest products harvested, by species § Effects of operations as identified under Criteria 6.1 § Changes in features identified under Criteria 6.2 § Annual monitoring of high conservation values identified under Criteria 9.1 § Invasive exotic species <i>For example:</i> · <i>Records of timber harvest volume by species</i> · <i>Records of rubber collection or latex production by volume</i></p>	<p><i>volume.</i></p> <p>8.2.3) The FME shall demonstrate a commitment to acquiring and utilizing information on key indicators pertaining to the production, environmental and socio-economic profiles of its operation. For FMU’s meeting SLIMF requirements, only the following indicator(s) of this criterion apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p> <p>8.2.4) Appropriate to the scale and intensity of operations, forest managers periodically gather information on components a) – e) enumerated in this criterion, above.</p> <p>8.2.5) Information necessary to judge progress towards management objectives is collected and recorded. In all cases this will include: § Amount of all commercial forest products harvested, by species § Effects of operations as identified under Criteria 6.1, § Changes in features identified under Criteria 6.2 § Annual monitoring of high conservation values identified under Criteria 9.1 § Invasive exotic species <i>Examples may include:</i> -<i>Records of timber harvest volume by species;</i> -<i>Records of rubber collection or latex production by volume.</i></p>
<p>8.3 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>8.3.1) In forest management certification evaluations where the landowner/manager wishes to make on-product use of the FSC logo, pertinent individuals are knowledgeable of the FSC’s current chain of custody requirements and submit a logo approval request to SCS prior to FSC logo usage.</p> <p>8.3.2) For “stump to forest gate” chain of custody, there exist written descriptions of the materials handling and inventory control procedures (i.e., chain-of-custody procedures) to assure that logs from the certified forest area are not mixed with logs from uncertified sources. The chain-of-custody procedures conform with the current FSC requirements.</p>	<p>8.3.1) The FME shall have written procedures for the tracking of certified products, also known as “Chain-of-Custody” (COC). At a minimum, these procedures shall include:</p> <ul style="list-style-type: none"> · The measures to control and track data related to volume and origin of harvested forest products (e.g., weights, inventories, and other measurements) in the forest, during transport, in logging decks and landings and processing centres controlled by the FME; · A description of the FSC product group (e.g., FSC-Pure rubber sheets) and the FME’s certificate code (e.g., SCS-FM/COC-XXXXXX) on invoices and other documentation

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
	8.3.3) Written descriptions exist of the materials handling and inventory control procedures (i.e., chain-of-custody procedures) to assure that rubber and other non- timber forest products originate from the certified forest area.	related to the sale of certified products; and · A description of the measures used to segregate certified forest products from non-certified ones through marking, labels, separate storage, and invoices or other documentation that accompanies the product until the point of sale, or the “forest gate.” The FME shall implement consistently the COC procedures defined in indicator 8.3.1. If the FME wants to use the logo and/or other trademarks of FSC or SCS on its products or in publications, including websites, it shall ask for documented approval from SCS prior to use.
8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.	8.4.1) Forest managers and planners demonstrate a commitment to adaptive management where information gathered during systematic monitoring is incorporated into revisions to the management plan as well as revisions to standard operating procedures, see Criterion 7.2 8.4.2) The evolution of the management plan over successive revisions demonstrates that the results of monitoring are being appropriately incorporated For FMU’s meeting SLIMF requirements, only the following indicator(s) apply: 8.4.3) Forest managers and planners demonstrate a commitment to adaptive management where information gathered during systematic monitoring is incorporated into revisions to the management plan as well as revisions to standard operating procedures, see Criterion 7.2	8.4.1) The FME shall demonstrate a commitment to adaptive management where information gathered during systematic monitoring is incorporated into revisions to the management plan, as well as revisions to its annexes, standard operating procedures or other planning documents (see Criterion 7.2). 8.4.2) The evolution of the management plan over successive revisions demonstrates that the results of monitoring are being appropriately incorporated and used to implement new or modified procedures in the field. For FMU’s meeting SLIMF requirements, only the following indicator(s) apply. These indicators cannot be used to evaluate non-SLIMF operations: 8.4.3) The FME shall demonstrate a commitment to adaptive management where information gathered during systematic monitoring is incorporated into revisions to the management plan, as well as revisions to its annexes, standard operating procedures or other planning documents (see Criterion 7.2).
8.5 While respecting the confidentiality of information,	8.5.1) Interested stakeholders are readily able to obtain a public summary of the results	8.5.1) The FME shall make available a public summary of the results of periodic monitoring that addresses the

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</p>	<p>of periodic monitoring that addresses the indicators listed in criterion 8.2 8.5.2) Forest managers endeavor to the keep the monitoring summary up-to-date</p>	<p>indicators listed in criterion 8.2.1. 8.5.2) The FME shall propose and respect an adequate and economically realistic time period for the periodic update of the public summary of monitoring, appropriate to the scale and intensity of operations. 8.5.3) For timber investment programs, the FME shall make public, at least to its investors and/or shareholders, the results and analysis of the forest inventory program. For FMU’s meeting SLIMF requirements, only the following indicator(s) of this criterion apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p>
	<p><i>Examples of non-compliance of FSC Criteria and guidelines.</i> No public summary of the monitoring results available Impacts of the plantation activities on flora and fauna and local communities not conducted. Monitoring of waste water from latex processing unit was found not complying with the parameters required by local guidelines issued by the concerned authorities Disposal methods for polythene and other waste may be improved or an alternative method may be explored. FM certificate number on a log dispatch record not indicated</p>	<p><i>Examples of non-compliance of FSC Criteria and guidelines.</i> A public report must inform about the activities of the company including information about: any complaints and conflicts statistics of accidents growth and yield of forest products composition of forests and species used and allowed to regenerate naturally At the time of the audit the FME had not prepared a publically available summary of the results of the monitoring indicators and as such, there was no time frame specified for the update of the same</p>

Principle #9: Maintenance of high conservation value forests

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

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p>	<p>9.1.1) An assessment of the defined forest area has been completed for the presence of areas meeting the FSC definition of high conservation value</p> <p>9.1.2) The assessment for the presence of HCVFs includes consultation with pertinent stakeholders and outside experts. Where available, an existing national toolkit is used to assist in the identification of HCVFs.</p> <p>9.1.3) Forest managers demonstrate a working understanding of the HCVF concept and definition and endeavor to comply with the spirit of this principle</p>	<p>9.1.1) The FME shall conduct an evaluation to identify High Conservation Values (HCV) attributes present in the FMU. This evaluation, at a minimum, shall include:</p> <ul style="list-style-type: none"> · Consultation of regional or national conservation databases and maps; · Consultation of the national HCVF toolkit, if it exists, or the first and third parts of the international toolkit for HCV presence (see <i>HCVF Toolkit</i> by WWF); · Consideration of forest inventory data and observations from field workers, contractors or consultants of the FME; · Interviews with biologist and scientific experts, local communities, and other stakeholders; · Identification and documentation of possible threats to HCVs. <p>9.1.2) For non-SLIMF operations, the FME shall:</p> <ul style="list-style-type: none"> · Provide a written evaluation for HCVs that includes the elements of 9.1.1 and proposals to protect these HCVs; · Provide a technical explanation for the HCVs identified and the recommendations presented for the protection of these attributes; and · Demonstrate that actions are being taken to protect and/or reduce threats to HCVs that stem from the FME's management activities. <p>For FMU's meeting SLIMF requirements, only the following indicator(s) of this criterion apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p> <p>9.1.3) The FME shall consult environmental stakeholders, government officials or researchers to identify HCVs and/or</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
		<p>HCVFs. If there are HVCs or HCVFs present, the FME shall take all reasonable action to protect these values and/or reduce threats to them.</p> <p>9.1.4) The FME shall consult the national HCVF toolkit, if it exists, or the first and third parts of the international toolkit for HCV presence (see footnote below).</p>
<p>9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>	<p>9.2.1) Forest managers provide to SCS a list of pertinent stakeholders who may be consulted regarding HCVFs</p> <p>9.2.2) Stakeholder consultation indicates that the forest management operation consistently considers and protects areas of high conservation value</p>	<p>9.2.1) The results of stakeholder consultation related to HCVs shall specify clearly the conservation values that were identified, as well as the proposed strategies for their maintenance, enhancement or reduction of threats. Non-SLIMF FMEs shall document this consultation.</p> <p>9.2.2) The FME shall maintain a list of all of pertinent stakeholders that the certifier can interview related to HCVFs.</p> <p>9.2.3) The results of stakeholder consultation shall indicate that the FME consistently considers and protects areas of HCV.</p>
<p>9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p>	<p>9.3.1) The conservation attributes of each identified HCV area found within the defined forest area are described in the management plan</p> <p>9.3.2) The management plan and public summary thereof contain specific policies for maintenance and enhancement of the conservation attributes that define HCV areas; these protections are consistent with the precautionary approach.</p>	<p>9.3.1) The FME, in the management plan and its public summary, shall describe the conservation values of each area of HCV identified in the FME, as well as the actions taken to maintain and/or enhance these values.</p> <p>9.3.2) A) For non-SLIMF operations, the FME shall propose and respect an adequate and economically realistic time period for the periodic update of the public summary of areas of HCV, appropriate to the scale and intensity of operations. B) For SLIMFs, the FME shall update all public summaries at least one time during the period of validity of the forest management certificate (5 years).</p> <p>9.3.3) The FME shall provide evidence in the field that it takes measures to protect HCVs, consistent with a precautionary approach.</p>
<p>9.4 Annual monitoring shall be conducted to assess the effectiveness of</p>	<p>9.4.1) Measurable effectiveness indicators are developed and presented in the HCVF section of the management plan</p> <p>9.4.2) Appropriate to the scale of and intensity of operations,</p>	<p>9.4.1) Measurable effectiveness indicators are developed and presented in the HCVF section of the management plan.</p> <p>9.4.2) Appropriate to the scale of and intensity of operations,</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>the measures employed to maintain or enhance the applicable conservation attributes.</p>	<p>annual monitoring is conducted that focuses on the effectiveness by which HCVF management and protection measures are maintaining and/or enhancing the pertinent conservation attributes 9.4.3) The results of HCVF monitoring are used adaptively in modifying HCVF management and protection policies as well in revising the management plan</p>	<p>annual monitoring is conducted that focuses on the effectiveness by which HCVF management and protection measures are maintaining and/or enhancing the pertinent conservation attributes according to the indicators developed in 9.4.1. 9.4.3) The results of HCVF monitoring are used adaptively in modifying HCVF management and protection policies, as well in revising the management plan.</p>
	<p>Examples of non-compliance of FSC Criteria and guidelines. The attributes of HCVF have not been established through consultation with relevant stakeholders. Investigation of the HCVF attributes has not been conducted according to accepted inventory techniques. There is no evidence of a management plan which include specific measures to ensure that maintenance and / enhancement of conservation attributes consistent with the precautionary approach. Specific measures for the implementation and maintenance of HCVF not written in the management plan. Monitoring indicators and frequency have not been defined with consultation of acknowledged experts, local and national stakeholders and no plan available. Plantation has not been assessed for any high conservation value forests or biological attributes. The status of HCVF or biological attributes to be verified. HCV may occur in jungle areas within FMUs and these areas are protected by default. The scope of the assessment was restricted to the residual forest tracts and did not include any areas in the rubber fields. There is no clarity on how the results of monitoring activities were being included in the management plan, as there had been no revisions of the management plan since commencement of monitoring activities.</p>	<p>Examples of non-compliance of FSC Criteria and guidelines. Measures required to maintain and enhance the conservation value of HCV areas should be identified, recorded in management plan. Summary of action taken and extent of conservation area needs to be prepared, updated and shared with the public The FME has not conducted an evaluation to identify the various HCV attributes present in the FMU. It has identified certain possible HCV attributes, but the identification has not been conducted as per the HCVF Toolkit. The identification process has also not considered HCV attributes related to sites having cultural values. Audit team concludes that the assessment was incomplete and not thorough. The FME has not provided a written evaluation of the HCVFs identified and the rationale for identification of the same.</p>

Principle #10: Plantations

Plantations shall be planned and managed in accordance with Principles and Criteria 1 - 9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
10.1 The management objectives of the plantation, including natural forest conservation and restoration objectives, shall be explicitly stated in the management plan, and clearly demonstrated in the implementation of the plan.	10.1.1) The management plan for the defined plantation forest area includes a presentation of the landowner and/or plantation owner objectives 10.1.2) The plantation forest objectives include express policies for natural forest conservation as well as restoration of degraded natural forest areas. 10.1.3) Plantation forest managers demonstrate a systematic pattern of implementing the management plan	10.1.1) The management plan for plantations shall include silvicultural and socioeconomic objectives, as well as for conservation and restoration of natural forests. 10.1.2) The FME shall demonstrate evidence of implementation of the objectives identified in 10.1.1 and their associated policies in forest management activities and/or administrative actions.
10.2 The design and layout of plantations should promote the protection, restoration and conservation of natural forests, and not increase pressures on natural forests. Wildlife corridors, streamside zones and a mosaic of stands of different ages and rotation periods, shall be used in the layout of the plantation, consistent with the scale of the operation. The scale and layout of plantation blocks shall be consistent with the patterns of forest stands found within the natural landscape.	10.2.1) The spatial pattern of planted stands within the plantation forest operation mimics natural patterns found within the landscape 10.2.2) Streamside buffer zones are established, within which natural vegetative cover is maintained or established. Width of buffer zones meet or exceed regional norms 10.2.3) Appropriate to the scale and intensity of operations, natural vegetative corridors are established for wildlife movement 10.2.4) The plantation design includes stands with a diversity of age classes and rotation periods	10.2.1) The spatial pattern of planted stands within the plantation forest operation mimics natural patterns found within the landscape. 10.2.2) Streamside buffer zones are established, within which natural vegetative cover is maintained or established. Width of buffer zones meets or exceeds regional norms. 10.2.3) Appropriate to the scale and intensity of operations, natural vegetative corridors are established for wildlife movement. 10.2.4) The plantation design includes stands with a diversity of age classes and rotation periods.

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>10.3 Diversity in the composition of plantations is preferred, so as to enhance economic, ecological and social stability. Such diversity may include the size and spatial distribution of management units within the landscape, number and genetic composition of species, age classes and structures.</p>	<p>10.3.1) A variety of species or provenances are employed in the planting program 10.3.2) The management regime introduces diversity through practices such as: variable rotations, cut blocks of different size and shape, maintenance of volunteer (naturally established) seedlings within planted stands 10.3.3) The plantation forest management plan contains biodiversity objectives, policies and guidelines</p>	<p>10.3.1) A variety of species or provenances are employed in the planting program. 10.3.2) The management regime introduces diversity through practices such as: variable rotations, cut blocks of different size and shape, maintenance of volunteer (naturally established) seedlings within planted stands. 10.3.3) The plantation forest management plan contains biodiversity objectives, policies and guidelines.</p>
<p>10.4 The selection of species for planting shall be based on their overall suitability for the site and their appropriateness to the management objectives. In order to enhance the conservation of biological diversity, native species are preferred over exotic species in the establishment of plantations and the restoration of degraded ecosystems. Exotic species, which shall be used only when their performance is greater than that of native species, shall be carefully monitored to detect unusual mortality, disease, or insect outbreaks and adverse ecological impacts.</p>	<p>10.4.1) Exotic tree species are planted only after an assessment of native species is conducted, in which it is demonstrated that native species cannot achieve comparable performance levels 10.4.2) Periodic monitoring is conducted of the adaptability of exotic stands, as indicated by measured levels of mortality, disease and insect outbreaks 10.4.3) Selection of plantation species and provenances is based on documented trials that demonstrate their suitability to the plantation sites and management objectives 10.4.4) Information about the source of seed or planting stock is presented in the management plan or another suitable document</p>	<p>10.4.1) Exotic tree species are planted only after an assessment of native species is conducted, in which it is demonstrated that native species cannot achieve comparable performance levels. 10.4.2) Periodic monitoring is conducted of the adaptability of exotic stands, as indicated by measured levels of mortality, disease and insect outbreaks. 10.4.3) Selection of plantation species and provenances is based on documented trials that demonstrate their suitability to the plantation sites and management objectives. 10.4.4) Information about the source of seed or planting stock is presented in the management plan or another suitable document.</p>
<p>10.5 A proportion of the overall forest management area, appropriate to the scale of the</p>	<p>10.5.1) Representative samples of existing natural ecosystems are being protected or restored in their natural state, on- or off-site</p>	<p>10.5.1) Representative samples of existing natural ecosystems are being protected or restored in their natural state, on- or off-site.</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>plantation and to be determined in regional standards, shall be managed so as to restore the site to a natural forest cover.</p>	<p>10.5.2) The percentage of the plantation forest operation that is devoted to natural forest cover exceeds regional plantation forestry norms</p> <p>10.5.3) Areas of natural forest or natural vegetative cover within the FMU are delineated on maps and, as necessary, delineated in the field for purposes of assuring protection For FMU’s meeting SLIMF requirements, only the following indicator(s) apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p> <p>10.5.4) Improvements to the ecological value of the plantation are made particularly around conservation features</p> <p>10.5.5) Where it is ecologically and economically unviable for a small plantation to manage a restoration area, the plantation manager or group is able to demonstrate off-site contributions to the management and/or restoration of similar landscape and ecosystem types either jointly with other adjacent small operations, or in-kind by supporting an existing protected area.</p>	<p>10.5.2) The percentage of the plantation forest operation that is devoted to natural forest cover exceeds regional plantation forestry norms.</p> <p>10.5.3) Areas of natural forest or natural vegetative cover within the FMU are delineated on maps and, as necessary, delineated in the field for purposes of assuring protection. For FMU’s meeting SLIMF requirements, only the following indicator(s) of this criterion apply; the indicator(s) are not to be used for assessing non-SLIMF operations:</p> <p>10.5.4) Plantation design and management practices shall maintain or enhance ecological values, especially those that relate to protected areas.</p> <p>10.5.5) Where it is ecologically and economically unviable for a small plantation to manage a restoration area, the plantation manager or group is able to demonstrate off-site contributions to the management and/or restoration of similar landscape and ecosystem types either jointly with other adjacent small operations, or in-kind by supporting an existing protected area.</p>
<p>10.6 Measures shall be taken to maintain or improve soil structure, fertility, and biological activity. The techniques and rate of harvesting, road and trail construction and maintenance, and the choice of species shall not result in long term soil degradation or adverse impacts on water quality, quantity or substantial deviation from stream course drainage patterns.</p>	<p>10.6.1) Plantation forest managers actively engage in field research to assess trends in soil productivity; soil types found within the plantation forest area are mapped and considered during field operations</p> <p>10.6.2) Prescriptions for the establishment, tending and final harvest of planted stands are designed with consideration to soil health and productivity</p> <p>10.6.3) Site disturbing activities do not adversely impact aquatic and riparian resources including water quality and do not significantly alter the hydrologic characteristics of the site; planted stand establishment is limited to flat or gently sloping terrain</p> <p>10.6.4) All stream courses within the operating area are identified and mapped</p>	<p>10.6.1) Plantation forest managers actively engage in field research to assess trends in soil productivity; soil types found within the plantation forest area are mapped and considered during field operations.</p> <p>10.6.2) Prescriptions for the establishment, tending and final harvest of planted stands are designed with consideration to soil health and productivity.</p> <p>10.6.3) Site disturbing activities do not adversely impact aquatic and riparian resources including water quality and do not significantly alter the hydrologic characteristics of the site; planted stand establishment is limited to flat or gently sloping terrain.</p> <p>10.6.4) All stream courses within the operating area are identified and mapped.</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
	10.6.5) The management plan contains policies and guidelines for soil maintenance and water quality protection	10.6.5) The management plan contains policies and guidelines for soil maintenance and water quality protection.
10.7 Measures shall be taken to prevent and minimize outbreaks of pests, diseases, fire and invasive plant introductions. Integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and biological control methods rather than chemical pesticides and fertilizers. Plantation management should make every effort to move away from chemical pesticides and fertilizers, including their use in nurseries. The use of chemicals is also covered in Criteria 6.6 and 6.7.	10.7.1) Plantation forest standard operating procedures include regular monitoring for pest and pathogen activity, inordinate levels of mortality, and the spread of invasive exotic plants 10.7.2) The management plan contains policies and guidelines for integrated pest management that are demonstrably followed in the field 10.7.3) Forest managers, through their policies and actions, demonstrate a commitment to progressively lessen the use of chemical pesticides and fertilizers 10.7.4) Appropriate to the scale and intensity of operations, there is a written fire prevention and suppression plan	10.7.1) Plantation forest standard operating procedures include regular monitoring for pest and pathogen activity, inordinate levels of mortality, and the spread of invasive exotic plants. 10.7.2) The management plan contains policies and guidelines for integrated pest management that are demonstrably followed in the field. 10.7.3) The FME, through its policies and actions, demonstrates a commitment to progressively lessen the use of chemical pesticides and fertilizers. 10.7.4) Appropriate to the scale and intensity of operations is the FME has a written fire prevention and suppression plan.
10.8 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 8, 6 and	10.8.1) Monitoring incorporates ecological and social impacts of plantation forest activities, see Criterion 4.4 and 8.2 10.8.2) Monitoring focuses on both on-site and off-site impacts such as landscape level effects generated by the species that are being planted 10.8.3) Species are selected for planting only after local trials and other empirical evidence demonstrates their suitability to the site	10.8.1) Monitoring incorporates ecological and social impacts of plantation forest activities, see Criterion 4.4 and 8.2. 10.8.2) Monitoring focuses on both on-site and off-site impacts such as landscape level effects generated by the species that are being planted. 10.8.3) Species are selected for planting only after local trials and other empirical evidence demonstrates their suitability to the site. 10.8.4) Acquisition of land for establishment of plantation forests does not adversely impact, without due compensation, local ownership rights or access/use

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
<p>4. 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.</p>		<p>patterns. For FMU’s meeting SLIMF requirements, only the following indicator(s) apply. 10.8.5) Monitoring incorporates ecological and social impacts of plantation forest activities, see Criterion 4.4 and 8.2.</p>
<p>10.9 Plantations established in areas converted from natural forests after November 1994 normally shall not qualify for certification. Certification may be allowed in circumstances where sufficient evidence is submitted to the certification body that the manager/owner is not responsible directly or indirectly of such conversion.</p>	<p>10.9.1) Records are of sufficient detail to enable the SCS auditor(s) to determine if conversion of natural forests to plantations has occurred since November, 1994 10.9.2) Any such conversions, if they have taken place, can be demonstrated to not be attributable to the current managers/owners</p>	<p>10.9.1) Records are of sufficient detail to enable the SCS auditor(s) to determine if conversion of natural forests to plantations has occurred since November, 1994. 10.9.2) Any such conversions, if they have taken place, can be demonstrated to not be attributable to the current managers/owners. 10.9.3) In cases of conversion post-November 1994, actions shall be taken that compensate said conversion convincingly with the support of field evidence and interviews and/or evidence obtained from stakeholders.</p>
	<p><i>Examples of non-compliance of FSC Criteria and guidelines.</i> There are no written defined objectives of the plantation in the management plan. Although various policy statements have been written on protection of wildlife, sensitive sites and protected forest there are no biodiversity objectives, policies and guidelines in the management plan. An absence of monitoring of social impacts of the plantation activities was observed.</p>	<p><i>Examples of non-compliance of FSC Criteria and guidelines.</i> Existing regional forest ecosystems must be identified; a representative protection and restoration concept for native forests must be set up based on this information. Interconnections between existing nature reserve areas must be established to create representative samples for each regional forest type with a sufficient size. In order to improve the poor genetic diversity within rubber fields some trials with normal seedlings must be started.</p>

<i>FSC International Standards Criteria</i>	<i>Country-specific Guidelines – Performance indicators (Sri Lanka)</i>	<i>Country-specific Guidelines – Performance indicators (India)</i>
		<p>Trials/experiments to reduce the use of chemicals must be conducted.</p> <p>The management plan does not include any ecological, silvicultural or socio economic objectives. As such, the estate is also not able to show how the management decisions and administrative actions are in tune with these objectives.</p> <p>Soil testing and research required – should be mapped and considered during planning of field operations</p> <p>Integrated pest management plans should be put in place, this may not be of use at present, but might be required in the future.</p> <p>Measures to monitor social and environmental impacts of plantation activities need to be put in place</p> <p>Record of all varieties that are being planted should be maintained.</p>

Sustainable Natural Rubber Initiative (SNR-i) Criteria and performance indicators:

The SNR-i is a voluntary initiative, requiring no third party audit or certification. There are five criteria that should be compiled with which covers improvement of crop productivity, rubber quality, forest sustainability, water management, human and labour rights. For the criteria pertaining to the environment, we find the SNR-i weak in comparison to other sustainability standards such as the FSC and SAN standards. It fails to address many important aspects of a rubber plantation that should have been included for sustainability certification. Below we give the performance indicators and their objective as per the guidelines available to the public. We also suggest local guidelines (for India and Kerala) for key environmental indicators. We believe, it is critical to strengthen the environmental criteria and that the rubber industry should be more pro-active and take more responsibility in safeguarding the environment. Appended is a note on some key environmental aspects that should be made part of the indicators for the respective criteria. This note is being shared with the IRSG and the SNR-i for their perusal.

<i>Performance Indicators</i>	<i>Suggested local guidelines</i>
Criteria 1: Support improvement of productivity	
Performance indicator 1.1: Optimizing the planting of recommended clones	The Rubber Board of India recommends the use of multiple clones to prevent pest and disease attack. The IRSG should also encourage more diversity within a plantation for its various benefits
Performance indicator 1.2: Optimizing planting density	The Rubber Board India's recommended spacing is 4.9 m x 4.9 m (420 plants/ha) in square planting or 6.7m x 3.4 m (445 plants/ha) in rectangular planting. A higher initial stand of about 500 plants/ha is recommended.
Performance indicator 1.3: Optimizing fertilizers and chemical use	Fertilizer and chemical use should be based on soil requirements. Also, all necessary precautions should be taken to ensure safe use of agro-chemicals. The Rubber Board of India identifies chemicals that are banned or are identified for restricted use in the state of Kerala
Criteria 2: Enhance Natural Rubber quality	
Performance indicator 2.1: Commitment to natural rubber quality	-
Performance indicator 2.2: Compliance with testing and grading	-
Criteria 3: Support forest sustainability	
Performance indicator 3.1: Compliance with relevant local legal requirements	Relevant local legal requirements include: Indian Wildlife Protection Act (1972): http://envfor.nic.in/legis/wildlife/wildlife1.html Forest Conservation Act (1980) : http://www.moef.nic.in/sites/default/files/Forest.pdf Indian Forest Act (1927) : http://www.moef.nic.in/sites/default/files/Indian%20%20Forest.pdf
Performance indicator 3.2:	This is repetitive as the first performance indicator. The local legal requirements includes respecting and following the laws related to protected

<i>Performance Indicators</i>	<i>Suggested local guidelines</i>
Protection/conservation of protected areas	areas.
Criteria 4: Water management	
Performance indicator 4.1: Compliance with relevant local legal requirements and local customary water use rights	Some local leg requirements pertaining to water include The Environment (Protection) Rules, 1986 rules relating to Natural rubber and rubber processing industries: http://www.cpcb.nic.in/Industry-Specific-Standards/Effluent/425.pdf Kerala Drinking water standard: http://keralapcb.nic.in/cmsadmin/fileUploads/Drinking_Water.pdf General effluent standard: http://keralapcb.nic.in/cmsadmin/fileUploads/General_Effluent_Standards.pdf
Performance indicator 4.2: Treatment of industrial waste water	The legal requirements are available at this link: The Environment (Protection) Rules, 1986 rules relating to Natural rubber and rubber processing industries: http://www.cpcb.nic.in/Industry-Specific-Standards/Effluent/425.pdf
Criteria 5: Respect human and labour rights	
Performance indicator 5.1: Child labour and minimum age for workers	-
Performance indicator 5.2: Forced labour	-
Performance indicator 5.3: Freedom of association and collective bargaining	-

Appendix 1: FERAL Comments on the sustainable natural rubber initiative (SNR-i) criteria and guidelines

June 1st 2015

This document summarizes the comments by Foundation for Ecological Research, Advocacy and Learning on the SNR-i and covers comments and suggestions for the criteria and performance indicators for these dealing with the environment.

FERAL congratulates, commends and puts on record its support of the IRSG's sustainable natural rubber initiative. The Hevea brasiliensis is a tree species known to grow well in tropical areas of the world. These areas also are biodiversity hotspots. To be a responsible industry and contribute to conserving the biological diversity of the world, adopting a sustainable approach is imperative and FERAL sees the SNR-I by the rubber industry as a positive step in this direction.

Criteria and performance indicators

Criteria 1: Support Improvement of productivity

Performance indicator 1.1: Optimizing the planting of recommended clones

The Rubber Board of India recommends the use of multiple clones to prevent pest and disease attack. The IRSG should also encourage more diversity within a plantation for its various benefits.

Performance indicator 1.2: Optimizing planting density

Inter-cropping has advantages – such as reduced loss to pests and diseases, and an alternate source of income in the case of small farmers. Optimizing planting density with provision for some intercropping might be an option that growers should consider.

Performance indicator 1.3: Optimizing fertilizers and chemical use

Fertilizer and chemical use should be based on soil requirements. Also, all necessary precautions should be taken to ensure safe use of agro-chemicals. The use of banned and restricted chemicals should be discouraged in certified farms at the least. Plantations should be pro-active in ensuring that their workers are provided with proper equipment, protective gears, safety

measures, and are made aware of potentially dangerous chemicals. Taking care of your workers and letting them know that you care goes a long way in getting a committed work force.

Criteria 3: Support forest sustainability

Performance indicator 3.1: Compliance with relevant local legal requirements

Performance indicator 3.2: Protection/conservation of protected areas

Under law, all persons are required to comply with the stated performance indicators. The SNR-i should come with stronger and more pro-active indicators. Some suggestions include

- 1. Natural ecosystems such as forests, grasslands, wetlands within and adjoining plantations identified and protected.
In addition to supporting many threatened and endemic plants and animals, they are important service providers to the plantation as well as to the local communities. Some services include watersheds, NTFP, natural enemies of pests.*
- 2. An inventory of plants and animals that are found on the plantation within and outside production areas should be made. Many endangered species that are protected under the law may be found and sufficient effort to inform the employees about their status and preventing harvesting or poaching of these should be communicated. Also, wildlife use areas should be identified and if required, restoration/habitat improvement measure should be taken*
- 3. If wildlife poaching is seen on the plantation, efforts to prevent and protect wildlife should be taken pro-actively.*
- 4. Often times, plantations are located in a manner that impacts connectivity for wild animals, making it difficult for them to access resource patches. Plantations should address connectivity where possible – simple steps such as planting native vegetation along roadside, water courses, use of live fences, shade trees within production areas, live barriers, etc. can provide safe passage for many small and medium sized animals.*
- 5. Buffer area between forests and other ecosystems and production area. Need more specific indicators (see SAN standard for example), some minimum width needs to be indicated.*
- 6. If prior to becoming a volunteer SNR-i signatory, if any ecosystems were affected or destroyed in the last decade or so, needs to be identified and mitigation measures taken*
- 7. Invasive species: Identifying and controlling invasive plant and animal species within plantations*
- 8. Planned usage and curbing indiscriminate use of chemicals especially those that are listed as prohibited internationally*

Criteria 4: Water management

Performance indicator 4.1: Compliance with relevant local legal requirements and local customary water use rights

Performance indicator 4.2: Treatment of industrial waste water

1. *Water budget, reducing wastage, encouraging water harvesting and informed water management for efficient use of water*
2. *Protection of wetlands, water bodies and other sources of water and conservation of watersheds that fall within the plantation boundaries and contributing to the protection of those that act as source of water to the plantation*

This report was written as part of the project titled “Exploring Sustainable Land use Practices in Rubber Plantations in a Critical Wildlife Corridor” undertaken by



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