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Executive Summary

Validating the Draft Revised ITTO Principles AND Guidelines for the Sustainable Management of Natural Tropical Forests

By Dr. James K. Gasana

Executive Summary

This Note provides a summary of the Validation Process that was organized by ITTO Secretariat to prepare a final Draft integrating comments made by ITTO Member countries on a revised draft presented to the Committee on Reforestation and Forest Management (CRF) in November 2011 in Guatemala. The validation was made through three workshops in Asia (with participants from Malaysia, Indonesia, and Philippines), Africa (with participants from Benin, Cameroon, Côte d'Ivoire, Central African Republic, Congo) and Latin America (Colombia, Guatemala, Peru). After the three workshops, the recommendations were consolidated to produce one document under the title "Final Draft revised ITTO Principles and Guidelines for the Sustainable Management of Natural Tropical Forests" for the consideration of the ITTC at its 48th Session. The new Draft has 16 principles, 84 guidelines and 310 recommended actions. Its size is reduced from more than 100 pages to 70 pages. As far as the structure and the bulk are concerned, it is more user friendly than the November 2011. If approved, it is expected to add value to the existing ITTO's SFM Guidelines. For that the results from a test conducted in Côte d'Ivoire are reassuring. Although there are differences in specific policy objectives between countries, there was a considerable convergence across the three Validation Workshops on the central importance of multifunctional forest management. Although the key market products of forestry are diversified in many countries, workshop participants generally had converging views on the importance that the Guidelines give to the environmental services rendered by forests to maintain or protect other values such as biodiversity, soil and water. A point of weak convergence of views was how much attention to pay to climate change and REDD+ aspects in the Draft Revised Guidelines. The current formulation took this problem into account by a formulation that recognizes the role of tropical forest management in carbon sequestration while not over-emphasizing climate change and REDD+.

A. Introduction

1. The revision of the ITTO Guidelines for the Sustainable Management of Natural Tropical Forests was prepared by two consultants, Dr. Juergen Blaser (Switzerland) and Dr. Cesar Sabogal (Peru). In the revision process, the consultants got inputs from two experts meetings: in Thun (Switzerland) in June 2010 and Antimary (Brazil) in August 2011. The revised draft was presented by Dr. James K. Gasana to the ITTO Committee on Reforestation and Forest Management (CRF) in November 2011 in Guatemala. The Committee commended the accomplished work but considered that more time was needed to allow ITTO members to provide comments. Subsequently, ITTO Secretariat requested Member Countries to send comments on the Draft. Upon receiving the comments, the ITTO Secretariat established a validation process for the Draft Guidelines. This process consisted in engaging a consultant to prepare a new working Draft integrating the comments received from Members, and organizing three regional validation ' workshops in Asia, Africa and Latin America.

2. This Note provides a summary of the Validation Process that was organized by ITTO Secretariat to prepare a final Draft integrating Member countries comments.

B. The Validation Process

B.1 Comments from ITTO Member Countries

3. The main comments received by the ITTO Secretariat from Member Countries are presented in Annex 2. The Members who provided comments are Benin, Guatemala, Malaysia, Norway and Switzerland. Their comments relate to both the structure and the content of the Draft Revised ITTO SFM Guidelines.

4. On the structure of the Document, the comments can be summarized as follows:

    – The introduction in PART I is too lengthy and needs to be made more concise and precise.
    – The Guidelines should be kept lean, simple and practical, avoiding unnecessary prescriptions and repetitions.
    – The principles should be described by their: rationale, guideline and recommended action without preamble statement for each guideline.

- Many key concepts used are not defined in the Glossary.
- Recommended actions are not numbered. Their wording needs to be action oriented.
- In many cases there are too many recommended actions per Guideline.
- Indicative stakeholder groups' column should add among stakeholders where it is necessary «local administration» in order to be in line with the law on decentralization in countries where it exists.

5. On the content, it was commented that:
    - The drastic increase of recommended actions as compared to the previous Guidelines may result in greater demands placed on the forest managers as far as implementation is concerned.
    - A clear connectivity between the Guidelines and the ITTO's C&I needs to be clearly established.
    - Drivers of unsustainable forest management such as bad governance need to be addressed.
    - A Guideline at the level of framework conditions on secure SFM funding is needed.
    - No definition of environmental services is provided.
    - While Forest Management Planning is not described as one of the principles, some good practices under forest management at FMU level have been elevated to the level of principles; ex. yield regulation and control.
    - With regard to community involvement in SFM, obtaining «their free prior and informed consent in forest management decisions» is a new process needing more time to be implemented.
    - Putting climate change mitigation and adaptation at FMU level as an annex creates the impression that it is an additional external issue to SFM. The annex should be an integral part of SFM.
    - Issues related to carbon management, climate change and REDD+ have been over-emphasized. It is premature to include REDD+ in the guidelines. The focus should be put on SFM by paying attention to promoting certification, with the understanding that a sustainably managed forest is carbon neutral.

B.2   Preparation of the Working Document for Regional Workshops

6. The ITTO Secretariat used a consultant to analyse, assess and incorporate, as appropriate, the comments made by ITTO member countries on the Draft Revised ITTO Guidelines for the Sustainable Management of Natural Tropical Forests.   The Consultant submitted to ITTO a new Draft which was used for validation through workshops held in the three tropical regions.

C   Organization of Regional Workshops

C.1   Workshops objectives, agenda, and venues

7. The objectives of the workshops were:
    - To contribute to the validation and finalization of the Draft Revised ITTO Guidelines, taking into account experiences in implementing sustainable forest management.
    - Specifically, to review the Amended Draft Revised ITTO Guidelines (July 2012).

8. The Agenda of the first workshop (see Annex 1) was developed by the ITTO Secretariat in collaboration with the first host country (Malaysia) and the ITTO consultant. The same Agenda was translated and used in the two other workshops. The venues, dates and countries where participants came from are shown in Table 1.

9. The participants were government officials involved primarily in forest policy formulation and implementation relating to SFM in their countries, representatives of ITTO - CSAG and TAG, stakeholders implementing SFM and timber certification, scientists, researchers and academics engaged in SFM.

Table 1: Workshops venues, dates, participants

Venue	Date	Countries where participants came from

Kuala Lumpur, Malaysia	10-12 July 2012	Indonesia, Malaysia, Philippines
Libreville, Gabon	16-18 July 2012	Benin, Cameroon, Central African Republic, Congo, Côte d'Ivoire, Gabon, Togo
Punta Sal, Peru	14-16 August 2012	Colombia, Guatemala, Peru

C.2   Workshop Process

10. **Validation.** By validation it is understood that there is examination of the guidelines in order to feel assured that requirements for the intended use are fulfilled. This requires checking:

   − Robustness of guidelines, to answer the question "Will successful SFM results be obtained if proposed ITTO P&G are used to guide forest management?"
   − Reliability to answer the question "Will the ITTO P&G allow SFM results which reflect stakeholders' expectations?"
   − Understandability, clarity and conciseness, to answer the question "Are the proposed P&G clearly formulated and understandable by intended users?"

11. **Principles.** Having clarified what validation is about, it was important for the workshops to share a common understanding of the key concepts of principle, guideline, and recommended action. The principles are statements of goals or values that represent the accepted or professed requirements that guide policies, processes and practices for achieving SFM. The set of the principles is understood by its users as the essential characteristics of SFM, which means that SFM would not be effectively met if any one principle was to be ignored. The expectation is that once the principles are understood, the actors involved in SFM will be able to implement good practices, keeping in view the specificities of their own contexts and with the assistance of more specific tools as needed.

12. The principles are clarified by a short narrative interpretation providing their rationale. The language of "vision/change/value" is used instead of "action" language, in order to state and focus on what is to be maintained or different in an SFM perspective rather than what is to be done.

13. The principles aim at supporting formulation, revision of policies and supportive laws and regulations, implementation of good practices at different levels of forest management. From this viewpoint, it is desirable to establish a link between Principles and Criteria and Indicators (C&I), so that items covered in the ITTO's C&I for SFM are adequately covered and vice-versa.

14. **Guidelines.** The Guidelines are evidence-based statements which assist decision-makers, forest managers and other stakeholders to make informed decisions about appropriate forest management decision or intervention. They suggest or recommend specific good practices for complying with SFM Principles. They are formal advisory statements which should be robust enough to meet the unique circumstances and constraints of the specific situation to which they are being applied. They are framed at a certain level of generality so as to be of relevance under most forest management conditions and circumstances. Guidelines are aspirational in intent. They are not intended to be mandatory or exhaustive and may not be applicable to every forest management situation. They facilitate the continued systematic development of the SFM and help assure a high level of application of good practices.

15. Taken together under respective principles, Guidelines express a desired forest management direction. They can be turned into objectives, outcomes, targets or indicators of future national, regional or FMU management plans. They differ from standards in that standards are national mandatory practices which may be required by national law, regulation, or specific policy implementation requirements and may be accompanied by an enforcement mechanism. They are not definitive and they are not intended to take precedence over the judgment of the actors. They are framed at a certain level of generality so as to be of relevance under most conditions and circumstances.

16. **Recommended actions.** Recommended actions are tasks that are proposed for the purpose of implementing respective guidelines. The actions proposed for a particular Guideline are meant to

be suggestive. Some of the actions proposed may be relevant in some cases but not in others, while there may be circumstances that demand actions that have not been addressed here at all. Such details need to be worked out by those actively participating in the implementation of SFM and these details are bound to vary depending on the context.

17. **Important aspects in the validation process.** The particular aspects to be assured of in the validation process are the following:
    a) Information value: The Guidelines inform decision makers, practitioners, the public, and other interested parties regarding desirable SFM practices.
    b) Internal consistency: No part of the Guidelines conflicts with any other part in intent or application.
    c) Flexibility: The Guidelines do not unnecessarily limit professional judgment and discretion.
    d) Feasibility: Implementation of the particular Guidelines is feasible in the current practice environment.
    e) Aspirational and clear language: The Guidelines are clear, succinct, and unambiguous in their use of language.

D. Workshops Outcomes

D.1   Some key messages from workshops

18. **Kuala Lumpur Workshop.** The participants carried out a considerable work of improving the structure and wording the Draft Revised Principles and Guidelines of SFM. On the content, they made important contributions on all the principles, particularly on good practices on policy and legal framework, and on sustainable forest management planning. They proposed removing the column indicating stakeholders for each proposed action.

19. Many participants found climate change and REDD+ are overemphasized, asserting that if a forest is sustainably managed, it will be carbon neutral. They were not favorable to integrating climate change in the main part of the Guidelines and preferred to keep it as an addendum. A similar view was expressed by government officials who presided both the opening and closing ceremonies.

20. **Libreville Workshop.** In his opening remarks, the Minister of Waters and Forests, H.E. M. Gabriel Tchango, said that the revision of ITTO's SFM Guidelines should respect the following:
    a) The populations have increasing expectations from the forests.
    b) The increased recognition of the role played by tropical forests in climate change mitigation.
    c) The necessity to take into account the rights of indigenous and local peoples on forests and their use.
    d) The development of forest certification as a factor in promoting SFM and access to environment-sensitive markets.
    e) The necessity to combat illegal logging
    f) The increasing role of NGOs in forest management and forest policy elaboration.

21. The Minister invited the participants to pay a particular attention to the following themes:
    a) Sustainable management of non-timber forest products;
    b) Biodiversity conservation;
    c) The participation of local peoples in sustainable management of forests;
    d) Effective management of community forests;
    e) Adapting government programs to climate change.

22. **The contribution from Côte d'Ivoire.** The Libreville Workshop was enriched by an interesting validation exercise conducted by Côte d'Ivoire, whose results showed the value and practicality of the Draft Revised Guidelines. Of a total of 81 guidelines, 47 were already practiced in the country's forests (58%), 21 guidelines were not sufficiently practiced (26%), and 13 guidelines were not at all practiced (16%).

23. **Punta Sal, Peru workshop.** Participants in the Punta Sal workshop did an excellent work on all the principles, editing the text to reduce its bulk, and improving the content. They reached a good

compromise on the formulation and presentation of climate change related principle. While integrating the latter in the text, they found no justification of overemphasizing REDD+.

24. Participants in Punta Sal workshop observed problems in translating key forest management concepts from English to Spanish and recommended paying attention to the translation of the final document. They further recommended adding key concepts in the Glossary and ensuring relevance of the texts describing rational.

Table 2: Example of validation of ITTO Draft Revised SFM Guidelines by Cote d'Ivoire				
Principles	**Number of Guidelines**	**Number guidelines which are practiced**	**Number of Guidelines which are not sufficiently practiced**	**Number of Guidelines which are not practiced**
Principle 1	10	5	5	0
Principle 2	4	4		
Principle 3	3	2	1	
Principle 4	5	4	1	
Principle 5	4		3	1
Principle 6	4		2	2
Principle 7	4			4
Principle 8	2	1	1	
Principle 9	3		3	
Principle 10	5	4	1	
Principle 11	4	3		1
Principle 12	6	4	2	
Principle 13	4			4
Principle 14	4	2	2	
Principle 15	18	18		
Principle 16	1			1
Total	81	47	21	13
Percentage	100	58	26	16

D.2 Outcome

25. After the third workshop, the consultant consolidated the work of all the three workshops to produce one document under the title "Final Draft revised ITTO Principles and Guidelines for the Sustainable Management of Natural Tropical Forests" for the consideration of the ITTC at its 48th Session. This document is produced in CRF(XLVI)/8a.

E. Conclusion

26. The new Draft has 16 principles, 84 guidelines and 310 recommended actions. Its size is reduced from more than 100 pages to 70 pages. As far as the structure and the bulk are concerned, it is more user friendly than the November 2011. If approved, it is expected to add value to the existing ITTO's SFM Guidelines. For that the results from a test conducted in Côte d'Ivoire are reassuring.

27. Although there are differences in specific policy objectives between countries, there was a considerable convergence across the three Validation Workshops on the central importance of multifunctional forest management. Although the key market products of forestry are diversified in many countries, workshop participants generally had converging views on the importance that the Guidelines give to the environmental services rendered by forests to maintain or protect other values such as biodiversity, soil and water.

28. A point of weak convergence of views was how much attention to pay to Climate Change and REDD+ aspects in the Draft Revised Guidelines. The current formulation took this problem into

account by a formulation that recognizes the role of tropical forest management in carbon sequestration while not over-emphasizing climate change and REDD+.

ANNEX 1: PROVISIONAL WORSHOP PROGRAM

Provisional Programme

Workshop on Validating the Draft Revised ITTO Guidelines for the Sustainable Management of Natural Tropical Forests

10 -12 July 2012, Kuala Lumpur, Malaysia

Organized by ITTO
In cooperation with the Ministry of Plantation Industries and Commodities

Time	Theme	Speaker
DAY 1 – Tuesday, 10 July 2012		
08:40-09:00	Registration	
09:00-09:30	Opening Remarks - Representative of the Ministry of Plantation Industries and Commodities - Representative of the Ministry of Natural Resources and Environment - Representative of Peninsular Malaysia Forest Department - Representative of ITTO	
09:30-10:00	Introduction to the workshop: objectives, expected results, working modalities, logistical arrangements and presentation of participants Group photo	Dr Hwan Ok Ma, ITTO
10:00-10:20	Coffee/Tea break	
10:20-10:40	Introduction to ITTO SFM related guidelines	Dr Hwan Ok Ma, ITTO
10:40-12:00	General Overview of the Draft Revised ITTO Guidelines for the Sustainable Management of Natural Tropical Forests Contentious Issues of the Draft Revised ITTO Guidelines for the Sustainable Management of Natural Tropical Forests Plenary discussion	Dr. James Gasana
12:00-12:30	<u>Presentation 1</u> Lessons learned from SFM Planning and Implementation in Peninsular Malaysia as well as Comments on Draft Revised ITTO SFM Guidelines	Forest Department of Peninsular Malaysia
12:30-14:00	Lunch break	

14:00-14:30	Presentation 2 Lessons from Sustainable Management in Protection/Conservation Forests in Sabah	Sabah Forest Department
14:30-15:00	Presentation 3 Lessons from Sustainable Management of Production Forests in Sarawak	Sarawak Forest Department
15:00-15:30	Presentation 4 Lessons learned from SFM planning and implementation at the national and FMU levels as well as Comments on the Draft Revised ITTO SFM Guidelines	Indonesia
15:30-16:00	Coffee/Tea break	
16:00-16:30	Presentation 5 Lessons learned from SFM planning and implementation at the national and FMU levels as well as Comments on the Draft Revised ITTO SFM Guidelines	Philippines
16:30-17:00	Key Elements of the Final Draft Revised ITTO Guidelines for the Sustainable Management of Natural Tropical Forests	Dr. James Gasana
17:00-17:30	Organization of three working groups Group 1: Principles 1, 2, 3, 10, 11 + Part I (Draft revised July 2012) Group 2: Principles 4, 5, 6, 7, 8, 9, 13 + Part II (Draft revised July 2012). Group 3: Principles 12, 14, 15, 17 + Introduction and Glossary (Draft revised July 2012) Working Groups Session 1: To Review the principles, respective rationale, guidelines and recommended actions, and make suggestions to improve formulation and clarity. Group 1 Group 2 Group 3	Dr James Gasana Working group facilitators
18:30-20:00	Cocktail	

DAY 2 – Wednesday, 11 July 2012		
08:30-08:45	Summary of Day 1 and Introduction to Day 2	Moderator
08:45-09:15	Presentation 6 SFM and climate change mitigation and adaptation: Review of forest-related issues in the UNFCCC	Ministry of Natural Resources and Environment Malaysia
09:15-09:45	Presentation 7 SFM and biodiversity conservation: Review of forest biodiversity-related issues in the CBD	Ministry of Natural Resources and Environment Malaysia
09:45-10:15	Presentation 8	MTCC

	Lessons learned from promotion of timber certification from Malaysian Timber Certification Council (MTCC)	
10:15-10:45	Coffee/Tea Break	
10:45-11:15	Presentation 9 Lessons learned from SFM and certification by PT Sari Bumi Kusuma (Forest Concession Holder) in Indonesia	PT Sari Bumi Kusuma
11:15-12:30	Plenary discussion on presentations 6, 7, 8 and 9	Moderator
12:30-14:00	Lunch	
14:00-14:30	Presentation 10 Research & Development relating to SFM – natural forests in Malaysia: Main outcomes of the Intensification of Research in Priority Areas Grant (IRPA)	FRIM
14:30-17:30	Working Groups Session 2: To identify comments and Recommendations for the Improvements of the Final Draft Revised ITTO Guidelines for the Sustainable Management of Natural Tropical Forests Group 1 Group 2 Group 3 Coffee/Tea break	Working group facilitators
18:30-20:30	Workshop Dinner	

DAY 3 – Thursday, 12 July 2012		
08:30-08:45	Summary of Day 2 and Introduction to Day 3	Moderator
08:45-11:00	Working Groups Session 2 (Continue) Group 1 Group 2 Group 3 Coffee/Tea break	Working group facilitators
11:00-12:30	Working Groups feedback to plenary and discussion – Part I - Structure and Key Elements of the Final Draft Revised ITTO draft revised ITTO Guidelines for the Sustainable Management of Natural Tropical Forests	Working group facilitators
12:30-14:00	Lunch	
14:00–15:30	Working Groups feedback to plenary and discussion – Part II - Specific comments/improvements to the Final Draft Revised ITTO draft revised ITTO Guidelines for the Sustainable Management of Natural	Working group facilitators

	Tropical Forests	
15:30-15:40	Coffee/Tea break	
15:40-15:55	Conclusion and Looking Forward – Final Draft Revised ITTO draft revised ITTO Guidelines for the Sustainable Management of Natural Tropical Forests	Dr James Gasana and Dr Hwan Ok Ma
15:55-16:00	Closing Session	Ministry of Plantation Industries and Commodities ITTO

ANNEX 2:   COMMENTS RECEIVED BY ITTO SCRETARIAT ON THE REVISED SFM GUIDELINES AND HOW THEY WERE ADDRESSED

N°	Issues	Comments received from ITTO Members Countries by the ITTO Secretariat	Members who commented	How it was addressed in the September 2012 Revised Draft
Comments on the structure of the Document				
1	Part I is too long	The introduction in Part I of the Revised Guidelines is too lengthy, the background should be more concise and precise.	Malaysia	Part I was shortened to 2 pages and is "INTRODUCTION" in the new Draft. Most of its former content is included in new Part 1 "THE CONTEXT FOR SUSTAINABLE MANAGEMENT".
2	Numbering of recommended actions	The recommended actions are not numbered in the Revised Guidelines.	Malaysia	Actions were systematically numbered in accordance with respective Guidelines and Principles.
3	Wording of Principles, Guidelines and Recommended actions	Wording of the "recommended actions" should be more action-oriented as some of them are just statements and are descriptive in nature.	Malaysia	The wording is action-oriented and this was done by participants in Regional Workshops.
4		The statement of principles and Guidelines should be identical in both Parts II and III for the same principles and Guidelines.	Guatemala	This was corrected by restructuring the Document to have only one Part (PART III) describing the Principles, Guidelines and Recommended Actions.
5		In Part II and Part III, though Principles are the same, the Guidelines under the same principles may not be the same in number and content.	Guatemala	-Idem-
6	Translation	Problems in translation from English to Spanish	Guatemala	This calls attention for the final translation.
7		The level of details in the statements of the Principles is not the same for all the Principles.	Switzerland	There was an effort to correct this in the new Draft.
8	Number of Recommended Actions	The drastic increase in the number of recommended actions would result in greater demands being 9placed on the forest manager to implement SFM, be it at the national or the FMU level.	Malaysia	The new Draft comprises less Actions than the November 2011 Draft.
9	Definition of Principle.	As the "Principle" is a key concept, it is proposed to add its definition in the Glossary. With such a definition, it will be easier to see the link between the principle and the criteria.	Switzerland	The concepts Principle, Guideline and Recommended Action have been defined in the new Draft under Part 2 and in the Glossary.

	Comments on the content			
10	Bulk of the Revised Guidelines	The Guidelines should be kept lean, simple and practical, avoiding unnecessary prescriptions and repetitions. In this connection, Part III of the document should be revised to just contain the Principle, Rationale, Guideline and the recommended actions without the preamble statements for each Guideline, as most of the content of the preamble statements have been included and reflected in the recommended actions. The Rationale for each Principle could be elaborated to contain the important gist of the preamble statements.	Malaysia	By merging and restructuring former Parts II and III into one Part 2 and the bulkiness of the Document was reduced. It was further reduced through the work done in Validation Workshops to reduced repetitions.
11	Link between ITTO SFM Guidelines and ITTO C&I	Given that both the ITTO Guidelines for SFM and the ITTO C&I provide normative standards for SFM, users should establish easily a clear link between both documents.	Switzerland	This link is established in Table 2 "Overview of the ITTO SFM Principles and connectivity with ITTO Criteria and indicators" of the new Draft. It is further established in the structuring of Part 3: the principles are grouped according to corresponding SFM criterion.
12	Indicative stakeholder group	Suggestion of several additions to the column of Indicative stakeholders under many principles. Among stakeholders, local administrations are specially highlighted.	Benin	Many participants think that the column "Indicative Stakeholders is not useful" given the diversity of countries contexts. It should be deleted in the final version.
13	Drivers of unsustainable forest management	The drivers of unsustainable forest management, especially governance related issues, seem not to be well addressed. It would be important to not only address how the governance should be ideally, but also how to counteract bad governance.	Norway	This is addressed by Recommended Action A1.3.6 "Adopt strategies for control of illegal activities, focusing on preventive actions".
14	Scope of Governance in the context of SFM	The title "Forest governance" reduces the dimension governance, given that there are governance factors outside the forest sector which affect SFM (ex. Customs practices). It is proposed to have a formulation that takes into account a wider scope of good governance.	Switzerland	Principle 1 is formulated with a wider scope for Governance, as follows: "Forest Policy, Governance, Laws and Institutional Arrangements".

15	Accountability and public participation	It is proposed to add a Guideline on "Accountability and public participation in forest management", to be in line with the advocated continued commitment to SFM by all stakeholders.	Switzerland	This is addressed in Recommended Action A1.1.3 as follows: "In revising SFM legislation, observe principles for drafting better forestry laws: (i) avoid legislative overreaching; (ii) enhance provisions for transparency and accountability; (iii) enhance role of stakeholders; (iv) ensure that the drafting of laws is participative and transparent; and (v) ensure that the law includes direct enforcement mechanisms".
16	Special focus being given to REDD+.	One notable inclusion has been with regard to emerging issues related to carbon management and climate change, with special focus being given to REDD+. The topics of carbon management and REDD+ have been over-emphasized in the Revised Guidelines, with the two aspects mentioned being included in numerous Principles in the revised document. The Revised Guidelines should focus on SFM with special attention being given to promoting forest certification as a means of ensuring and assessing the practice and effective implementation of SFM. Furthermore, it has generally been acknowledged that a sustainably managed production forest is carbon neutral, that is, it will produce no net carbon emissions over the long term.	Malaysia	This was largely addressed under Principle 6 "Ensure that management at FMU level is implementing national policies and international commitments for low-carbon and climate-resilient development strategies" of the new Draft.
17		Although climate change is addressed in several parts of the text, having "CLIMATE CHANGE MITIGATION AND ADAPTATION AT THE FMU LEVEL" as an annex creates the impression that it is an additional, external issue to sustainable forest management. We feel strongly that this text should	Norway	This was addressed in the new Draft by including Principle 6 "Forest carbon management" in the Main Text. It is also addressed under G1.8 "Consider taking action to identify and integrate relevant emerging issues into SFM". Where when themes like REDD+ can be taken into account.

		be integrated in the main text to show that it is an integral part of SFM.		
18	REDD+ as a financial incentive	The full potential of REDD+ as a financial incentive to tropical countries should be explored under the United Nations Framework Convention on Climate Change (UNFCCC). As it is now, REDD+ is still an evolving process and its inclusion in the Revised Guidelines is deemed to be premature. If ITTO deems it necessary to include these emerging issues at this juncture, the Revised Guidelines should acknowledge the need for an early revision (within the next five years) to take into cognizance the latest developments pertaining to REDD+.	Malaysia	The formulation of Principle 6 in the Draft Revised SFM Guidelines address this comment as the focus is on carbon management within SFM.
	Importance to the social values of forest and inclusive decision making	The Revised Guidelines have accorded greater importance to the social values of forest and inclusive decision making as well as community involvement in SFM. This is noteworthy as social sustainability is one of the three pillars of SFM. However, in implementing respective Principles, there is a need to fully appreciate the fact that the involvement of the indigenous peoples and local communities, especially with regard to obtaining their free, prior and informed consent in forest management decisions, is a relatively new process in most tropical developing countries, and therefore needs more time to be effectively implemented. These constraints should be given due consideration and reflected in the formulation of the recommended actions.	Malaysia	It is understood that the Guidelines are not mandatory but are a source of guidance to decision-makers, professionals, forest operators, etc. who may need information on good practices of SFM.
19	Framework conditions	Under Principle 1, there are no guidelines on financial issues and promotion of private sector.	Switzerland	Financial issues are addressed by Recommended Action A1.5.5 "Seek innovative funding mechanisms such as

				national forestry funds to finance SFM programs".
20	Environmental services	The concept of environmental services lacks definition	Switzerland	A definition is provided in the Glossary.
21	Forest Management Planning	Forest management planning is a cornerstone of forestry practices. It provides prescriptions based on appropriate technical forestry principles, practices, and business techniques to the management of a forest to achieve the stated objectives. Yield regulation and control are part of the practices and techniques that Management Plan takes into account. In this regard, the Management Plan being of a higher rank as far as techniques and practices are concerned, and should be elevated to a Principle.	Switzerland	This was addressed by defining Principle 14 ": Forest management planning at national/regional level", Principle 15 "Forest management planning at FMU level" and Principle 16 "Adaptive management". This involved bringing to the level of Guidelines some good management practices which were defines as Principles.