

National Forest Stewardship Standard for Namibia

NFSS Draft 1.0 (January 2018)

Consultation Report and SDG Responses (June 2018)

Key: Proposals highlighted in **green** are those where a change has been made, those highlighted in **red** are those where no change has been made. SDG responses to the consultation feedback received are shown in red.



1. Introduction

1.1 Background

A public consultation to generate feedback on the first draft of the Namibian NFSS was carried out for 61 days between 01 February 2018 and 02 April 2018.

The consultation was advertised on the FSC Africa website, the Namibian Charcoal Association website, FSC Africa Facebook and Twitter accounts. In addition, an advert was placed in the FSC Africa and the Namibian Charcoal Association newsletters.

The following documents were made available to stakeholders on the 2 websites:

- The Draft National Forest Stewardship Standard, inclusive of Appendices
- A consultation feedback column.

The Draft Standard is broken down into Requirements as follows:

- 10 principal sections (e.g. 1: Compliance with Laws)
- 70 criteria (e.g. 1.1: Land tenure and management rights)

Comments were either submitted by email, with use of the consultation form provided and in some cases, without the form. The unedited comments is provided in Annexure 2

General comments are summarized in Part 2 of this report, including a summary checklist. Specific comments are summarized in Part 3. These two parts are intended as the working checklists to make it easy for the drafting team to consider each issue without recourse to the raw responses. Respondents are identified by the numbers in Appendix 1 (no respondents requested that their names be withheld).

1.2 Characteristics of respondents

07 organizations or individuals responded to the consultation.

- Forestry practitioners (1)
- Traditional People representatives (5)
- Certification bodies (1)



Where an organization has two or more roles, the organization's most relevant role was taken as its primary interest category.

A full list of respondents is provided in Appendix 1.

2. General Overall Comments

2.1. Positive Feedback

4 stakeholders agreed and supported the content of the standard

2.2. Negative Feedback

No negative feedback from the stakeholder were received.

2.3. Other Comments

A stakeholder indicated that the annexures referenced in the table required cross-checking to ensure alignment. Concern was expressed over the information included in the verifiers and guidance. The stakeholder emphasized that this information is not normative. The stakeholder encouraged use of the labelling of indicators for Group Schemes and Large Organizations' vs those required for SLIMF FMUs only.

Stakeholders required clarification within the Standard on the SLIMF definition and the application of scale and intensity - Group Schemes were categorized at the same level as Large Organizations'.

Detailed Comments with SDG response

Please refer to Appendix 2



Appendix 1: List of Respondents

Number	Stakeholder Name	Interest Group
1	Michal Brink	Forest Practitioner
2	Marie-Christine Flechard	Certification Body
3	Chief Tsamkxao Toma	Traditional Peoples Group
4	Counsellor Dillxao Lláó	Traditional Peoples Group
5	Oma Tsamkgao	Traditional Peoples Group
6	Leon	Traditional Peoples Group
7	Kileni Fernando	Traditional Peoples Group

Appendix 2: Unedited Comments from Stakeholders

Stakeholder Number	Unedited Comments	SDG Response
1	<p>1 Is the standard a charcoal standard only, or will it also be applicable to natural forest harvesting for lumber and plantation forestry? Hat about other biofuel projects?</p> <p>2. SLIMF indicators are critical for this standard to meet the needs of the Namibian people. A lot of work needs to go into the standard to make it "SLIMF friendly"</p> <p>3. It is recommended that the SLIMF threshold for Namibia is increased to 10 000 ha for low intensity farms. The 5000 is too low for charcoal burning (and possibly for other biofuel projects like pellet manufacturing)</p> <p>4. The requirement to "protect" 5% of the total area does not make sense as charcoal harvesting is in fact a way of rehabilitating the ecosystem and should thus be allowed in protected areas that have bush thickening.</p> <p>5 Production Forest Area = Farm Unit</p> <p>6 MAI = 20 years / farm size</p> <p>7 Seek clarification as to whether it is possible to change the SLIMF criteria from 5000 cubic meters to 10 000 cubic meters</p> <p>8 Indicators must be separated between SLIMF and non-SLIMF (currently not sufficient separation)</p> <p>9 ANNEX E – Elements of management plan – try amending to be more practical to Namibian context. Must SLIMF members also comply to full spectrum?</p> <p>10 ANNEX G – Monitoring - try amending to be more practical to Namibian context. Must SLIMF members also comply to full spectrum? Formal monitoring on SLIMF farms?</p> <p>11 Water Sampling – SLIMF only control measures in place no need to sample water</p> <p>12 PPE</p> <p>o No gloves required for chopping – (according to ILO) – only required when using a hand saw - PLEASE CONFIRM</p> <p>o PPE rewording - "Overalls shall be provided, but workers should have the discession of wearing them"</p> <p>o Gloves only required when working with Kilns</p> <p>13 Acceptable methods of bush thinning (mechanical, bush rolling/saws etc)</p>	<ol style="list-style-type: none"> 1. Communicated that the NFSS will cover all timber and non-timber forest products produced within a certified FMU. 2. Noted – SLIMF indicators to be highlighted within the NFSS, SLIMF size of 6000ha was previously agreed by SDG. Volumes need to be re-defined by SDG 3. As above 4. SDG included 10% conservation area as per the IGI, but upon further debate agreed 5% at landscape level, within FMUs, or at Group Scheme Level was sufficient. SDG included guidance to inform CBs on how the 5% could be met within the Namibian context. 5. This is dependent on context and management objectives of the FMU. SDG will not prescribe FMU size to be included in scope of certification 6. MAI dependent on species, geographic zone within Namibia. SDG agreed that MAI could not be prescribed within the NFSS. 7. SDG concluded to maintain current 5000m3 limit 8. Noted and addressed by the SDG 9. Annexures are Normative and CHs should follow the 'shall' and 'should' wording utilised to indicate what is mandatory. SDG has revised the Annexures 10. As above 11. SDG agreed that drinking water for employees and contractors living within the FMU needs to be carried out by all CHs 12. PPE – gloves only required for use when burning charcoal (Kilns). Revised the wearing of Overalls. Clarified within NFSS 13. Harvesting methods defined by each CH, SDG will not define methods, as they may change over time. Acceptable methods does not negatively impact environmental values.



3	<p>They understood and agreed with all of the standards and found it very good. They replied with the example of people that are coming into Bushman land east, into their conservancy with cattle, without meeting with them beforehand.</p> <p>That the cattle damage the veldt food and remove the grass they use with which to build their traditional houses. The cattle herders cut the trees with which they use to build their houses, to build kraals and camps.</p> <p>They can no longer burn the grass between three villages, like they used to in order to encourage the growth of felt food and to entice game to graze the new grass so that they could hunt.</p> <p>They used to keep their own cattle numbers down to avoid the above.</p> <p>They requested that people should make an effort to understand each other and their traditions.</p> <p>They informed me that the Bushman from Busman land west was brought in from Angola by the SADF and that they are not indigenous like the Bushman from the east who are still allowed to hunt. They have not really started utilizing their forests as they do not have as much as the west.</p>	<p>The SDG noted the concerns of stakeholder engagement with neighbouring communities. This has been included in the NFSS for CHs to adhere to.</p>
4	As above. Joint session	Noted
5	As above. Joint session	Noted
6	As above. Joint session	Noted
7	<p>Principle 3 must stay in our standard. If no San Communities are identified in 3.1, the rest of the Principle need not be addressed. The SDG should consult with the 3 San-led conservancies: Nyae Nyae, N#a Jaqna (Tsumkwe West) and the 5,752 members of the Kyaramacan Association living in Bwabwata National Park.</p>	<p>The SDG noted the concerns of the stakeholder and chose to maintain Principle 3 within the NFSS with the stipulation that only CHs with Indigenous Communities in their vicinity are required to comply with all criteria in Principle 3. All other CHs shall only comply with Criterion 3.1.</p>



Stakeholder 2 responded within the Consultation form

Principle 1	Indicator	Comment	Suggestion/ Proposed wording of the Indicator	SDG Response
	1.1.1	Missing word in the Indicator (authority?)	Review wording	noted and changed
	1.1.1	Verifiers include Forest permit: a forest permit is a license granted for harvesting over a short-term period. Not a proof of legally registered organization. Criterion 1.1. refers to “legally define entity” and “legal registration”	Review proposed verifiers	SDG noted that the Forest permit process requires validation of legal registration of the Organization (applicant) by the Authority. The Auditor can utilise 1 document to validate various processes. There is no evidence of corruption within this process between the Authority and Organisation.
	1.2.2	“...clearly marked or documented”: is the intent for the boundary to be either clearly marked in the field OR to be documented through mapping?	Clarify intent of Indicator	Noted – SDG clarified wording in the Indicator
	1.2.2	The wording of the whole indicator is rather confusing. It is unclear what is required for freehold lands and non-freehold lands. Indicator 1.2.2 & 1.2.3 seem to have been merged but this make for an indicator that is confusing & will be difficult to audit	Suggest creating separate indicators for separate land tenure systems	SDG did not merge IGI 1.2.2 and 1.2.3. SDG re-worded the Indicator



	Criterion 1.3	Only 1 indicator proposed here to cover whole Criterion. Indicator proposed by SDG i.e. 1.3.1 does not cover for part of the Criterion that requires <i>“The Organization shall pay the legally prescribed charges associated with such rights and obligations”</i> . Such charges might include e.g. Fees related to harvesting/marketing permit, VAT were applicable, etc.	Include Indicator to cover for part of Criterion that relates to fees & charges.	SDG has covered payments and related charges within 1.3.1 – part 3
	1.4.1 & 1.4.2	What is the fundamental difference between those 2 indicators? Both require measures to be implemented to protect against illegal activities	Review wording to clarify intend of both Indicators	SDG has noted the concern but notes that the current wording already describes intent and difference – 1.4.1 covers illegal activities (hunting, fishing, trapping) whilst 1.4.2 covers unauthorized/ illegal harvesting
	1.4.1	Under <i>“Verifiers”</i> it is required that <i>“At least one of the following” should apply</i> ”. This statement should be removed as confusing (i.e there might be other means not listed here) + verifiers are not normative.	Remove statement	Noted – SDG agreed
	1.4.3	Acronyms NAMPOL and TA not report in Abbreviations section	Report acronyms in Abbreviations section 10	Noted – SDG included them within the abbreviations section
	Criterion 1.5	None of the 2 Indicators proposed to cover for this Criterion are making reference to <i>“ratified international conventions and obligatory codes of practice”</i> as required under C1.5. What about compliance with CBD, ILO, UN CCD, etc.?	Suggest adding Indicator to cover for ratified international conventions	The SDG included the ratified international conventions within Indicator 1.5.1 but chose to omit the Codes of Practice – there are no <u>obligatory</u> codes of practice in Namibia.



	Criterion 1.5	No reference to compliance to <u>Code of Practices</u> in any of the Indicators. A number of references are given under Annex A / Section D (Local Standards & best Operating practices). Those could be very good references and farmers should be encouraged to use them?	Suggest adding Indicator to cover for Code of Practices	As above – there are no <u>Obligatory</u> Codes of Practice in Namibia. SDG has included reference to the Best Operating Practices in the Guidance Sections of the Indicators, where relevant
	1.6.1	2scenario are given under “Verifiers” for “ Group Scheme & Large-scale organizations “ and for “SLIMF & Small-scale Organisations”. Verifiers are not normative so if the intent was to create 2 different conditions for those 2 scenario then 2 separate Indictors should be created to reflect this Group Schemes seem to be considered de facto as large scale Organizations. This is not necessarily the case See also my comments below under section “Other comments” regarding Scale.	Remove wording from verifiers and create separate indicators for “small” and “large” scale organisations See my comments under section “Other comments” below.	Noted – SDG has separated indicators for SLIMF CHs SDG has reconsidered the application of Group Schemes being held at the same level as Large Organizations’. Group Schemes were combined with Large scale Organizations for Indicators that the SDG felt appropriate.
	1.6.2	Same comment as above	Same comment as above	noted
	1.8.1	2scenario are given under “Verifiers” for “ Group Scheme & Large-scale organizations “ and for “SLIMF & Small-scale Organisations”. Verifiers are not normative so if the intent was to create 2 different conditions for those 2 scenario then 2 separate Indictors should be created to reflect this	Remove wording from verifiers and create separate Indictors for “small” and “large” scale organisations	noted



	1.8.1	Under SLIMF & Small-scale operations a MP is required for compliance with this requirement. A MP won't suffice to establish compliance, but a statement within the MP might.	Consider review	The intent of the SDG was a statement within the management plan – this has been clarified within the verifier
	1.8.1	Group Schemes seem to be considered de facto as large scale Organizations. This is not necessarily the case See also my comments below under section "Other comments" regarding Scale.	See my comments under section	Noted. Scale was clarified by the SDG
Principle 2	Indicator	Comment	Suggestion/ Proposed wording of the Indicator	
	2.1.1	<p>Compliance with Namibian Labour Act is already included under Indicator 1.3.1. Could this Indicator be more prescriptive and clearly requires contracts to be in place for workers?</p> <p>Give consideration under this Indicator for cases where workers are employed (e.g. under contract with farm owner) and where workers are self-employed.</p> <p>Guidance indicate "where relevant... the collective agreement signed by the NCA.." What if this agreement goes beyond the labour law requirement?</p>	<p>Consider re-wording Indicator</p> <p>Consider either developing separate Indicators or include different employment conditions within same Indicator</p>	SDG agreed to separate indicators for different employment methods



	2.1.3	Verifiers are not normative. If the intent for “ <i>Group Scheme & Large-scale organizations</i> “ is for a written agreement to be in place then a separate Indicator should be developed to reflect this, and in association with this verifier.	Consider specific Indicator for Group Scheme & Large-scale organizations	SDG agreed to separate indicators for different employment methods
	2.1.3	Verifiers are not normative. If the intent for “ <i>Small-scale & SLIMF organisations</i> “ is for a memorandum to be in place then a separate Indicator should be developed to reflect this, and in association with this verifier	Consider specific Indicator for Small-scale & SLIMF organisations	SDG agreed to separate indicators for different employment methods
	2.1.4	Guidance on debt bondage is provided under Indicator 2.4.1, and could be reported here. Debt bondage can potentially be very high (i.e. in the form of farm shop bill) and an issue for charcoal workers. A separate and specific Indicator could be develop to tackle this issue.	Consider developing a specific Indicator on debt bondage	The SDG considered the debt bondage and decided to maintain this within the initial indicator. The SDG highlighted the concern within the Guidance
	2.1.4	Under “ <i>Verifiers</i> ” it is required that “ <i>At least one of the following</i> ” should apply”. This statement should be removed as there might be other means not listed here e.g. farm shop debt + verifiers are not normative.	Remove statement	noted
	2.1.5	The Labour Act 2007 indicates 14 as the minimum age, but makes provisions (i.e. Minister regulations) for work for children aged 16 to 18 under specific circumstances.	Align Indicator with Labour Act	SDG agreed



		The Indicator here refers to 15 years; this seems to contravene the Labour Act?		
	2.2.1	Verifiers are not normative. If the intent for “ <i>Group Scheme & Large-scale organizations</i> “ is to have a policy in place then a separate Indicator should be developed to reflect this, and in association with this verifier.	Consider specific Indicator for Group Scheme & Large-scale organizations	SDG has decided to revise the wording of indicators
	2.2.2	Unclear what the intent of this Indicator is. Is it to promote equal opportunities for job and training for both women and men? If so what is the relevance of H&S in this context (which equally apply to women and men)?	Consider re-wording of Indicator to clarify intent	SDG has decided to revise the wording of indicator
	2.2.4	Re. paternity leave the Guidance indicates that it is not catered for by the Labor Law, so unclear under what circumstances the statement “ <i>May be booked as Leave, where Applicable</i> ” could apply? If paternity leave is made compulsory by this Indicator then it shall apply in any case...	Clarify Guidance	SDG elaborated the intent within the Guidance
	2.3.2	Indicator 2.3.1 is quite generic in its wording. Could 2.3.2 be re-worded to require for a risk evaluation to be conducted for each task and each equipment used?	Consider re-wording	SDG has re-worded the indicator to clarify the intent
	2.3.3	Annex C is only referred to under Guidance. Can Annex C be directly referred to in the Indicator itself since the SDG has developed specific requirements for PPE?	Consider refereeing to Annex C directly in the Indicator	SDG agreed



	2.3.5	Verifiers are not normative. If the intent for “ <i>Group Scheme & Large-scale organizations</i> ” is to provide training then a separate Indicator should be developed to reflect this, and in association with this verifier.	Consider specific Indicator for Group Scheme & Large-scale organizations	This Indicator was revised by the SDG – as per Labour Law, all organizations are required to maintain records for employees.
	2.3.5	Verifiers are not normative. If the intent for “ <i>Small-scale & SLIMF organisations</i> ” is to verbally communicate with workers then a separate Indicator should be developed to reflect this, and in association with this verifier. Also the wording here contradicts the intent of the Indicator that states “ <i>Records are kept on health and safety practices</i> ”.	Consider specific Indicator for Small-scale & SLIMF organisations	As above
	2.3.6	Verifiers are not normative. If the intent for “ <i>Group Scheme & Large-scale organizations</i> ” is to have an assessment + training in place then a separate Indicator should be developed to reflect this, and in association with this verifier.	Consider specific Indicator for Group Scheme & Large-scale organizations	SDG separated indicators
	2.3.6	Verifiers are not normative. If the intent for “ <i>Small-scale & SLIMF organisations</i> ” is to only verbally communicate with workers then a separate Indicator should be developed to reflect this, and in association with this verifier.	Consider specific Indicator for Small-scale & SLIMF organisations	SDG separated indicators



	2.3.7	Annex D is only referred to under Guidance. Can Annex D be directly referred to in the Indicator itself since the SDG has developed specific requirements for workers accommodation?	Consider refereeing to Annex D directly in the Indicator	SDG agreed
	2.4.1	<p>It is not clear to me if “<i>Namibian Minimum Wage Rate</i>” is applicable in the context of charcoal workers in Namibia (i.e. virtually the sole type of FSC certified operations that exist in the country currently)? My understanding is that a minimum wage applies to domestic workers, but that the Agri. sector was covered by collective agreement with Unions and should also include compensation in case no ration is provided to workers staying on site (see notes below in blue). In this sense I believe that the IGI most suitable for the context of Namibia is not 2.4.1 but 2.4.2 1) (i.e. farm workers minimum wage) and also 2.4.12 2) (i.e. agreed rate/ton within the charcoal industry).</p> <p>If charcoal workers are paid per ton of charcoal (which is most commonly practiced) there should be a system in place to ensure that the corresponding minimum wage (either weekly or monthly) is effectively been monitored and paid by the employer</p>	<p>Consider re-wording Indicator to make this requirement more specific to the Namibian context.</p> <p>Consider developing a separate Indicator requiring employer to monitor that they effectively pay corresponding minimum wage</p>	SDG adapted 2.4.2 with reconciliation of payments and removed 2.4.1 of the IGI



		<p>Guidance: Makes reference to Labour Act but can other source of info be given since the Labour Act does not in itself give any indications about minimum wage rate</p>	<p>when price is agreed per ton of charcoal</p> <p>Consider other relevant source of Information as guidance</p>	
	<p>2.4.1 (Notes for SDG to consider)</p>	<p><i>Successful wage negotiations between the Agricultural Employers Association (AEA), Namibia National Farmers Union (NNFU), Namibia Emerging Commercial Farmers Union (NECFU) and Namibia Farm Workers Union (NAFWU) took place on October 9, 2017. Thus the previous farm workers minimum wage of 2014 was increased with 25%: the minimum cash wage increased from N\$3,70 to N\$4,62 per hour or N\$900 per month for a worker who works 45 hours per week. For those who do not give free rations, the ration allowance increases from N\$400 to N\$500 per month. The total minimum basic wage for a farm worker's value is thus now N\$1 400 per month. To calculate the value of free rations an average price of N\$30,00 per kg meat and N\$6,00 per litre milk is taken. Other free products are calculated at cost price. The part of the supply of housing, sanitary- and water facilities as well as electricity (if available) has not changed. The AEA is of the opinion that unskilled workers on farms are better off than in other industries as farm workers usually get free housing, rations, water and fire wood</i></p>		



		<p><i>whilst workers in other industries have to pay a lot for this. The aim of the farm workers minimum wage is a starting wage for young entering workers without any experience into the market. The real average basic salary of farm workers on commercial farms were according to the 2016 AEA wage report already N\$1 975 per month, inclusive ration value. This is 41% more than the minimum wage which will now come into force on November 1, 2017.</i></p>		
	2.4.2	<p>Delayed payment is common practice in charcoal industry (as noted under Guidance). Can the Indicator be more specific and require payment being effective from 2nd load of charcoal maximum.</p>	<p>Consider rewording Indicator to make it more prescriptive</p>	<p>SDG revised the indicator</p>
	2.5.1	<p>Annex B should be referenced in the Indicator</p>	<p>Consider refereeing to Annex B directly in the Indicator</p>	<p>SDG agreed</p>
	2.5.3	<p>Verifiers are not normative. If the intent for “ <i>Small-scale & SLIMF organisations</i>” is to only verbally communicate with workers (i.e. no register kept) then a separate Indicator should be developed to reflect this, and in association with this verifier.</p>	<p>Consider specific Indicator for Small-scale & SLIMF organisations</p>	<p>SDG revised the indicator</p>



	2.6.1	The term “ <i>developed through culturally appropriate engagement with workers</i> ” has disappeared from the wording of the proposed Indicator. This notion of <i>engagement</i> is one of the major change introduced by the P&C V5 and the IGI. I believe this should be reintroduced in the wording	Consider re-wording in line with initial IGI wording	SDG revised the indicator
	2.6.1	Verifiers are not normative. If the intent for “ <i>Group Scheme & Large-scale organizations</i> ” is to have documented procedure in place then a separate Indicator should be developed to reflect this, and in association with this verifier.	Consider specific Indicator for Group Scheme & Large-scale organizations	SDG revised the indicator
	2.6.1	Verifiers are not normative. If the intent for “ <i>Small-scale & SLIMF organisations</i> ” is to verbally communicate with workers then a separate Indicator should be developed to reflect this, and in association with this verifier.	Consider specific Indicator for Small-scale & SLIMF organisations	SDG revised the indicator
	2.6.3	Verifiers are not normative. Verifiers indicate to keep record for 5 years. If the intent for this to be normative then this should be included in the Indicator	Re-word Indicator to require records to be kept for 5 years.	SDG revised the indicator
Principle 3	Indicator	Comment	Suggestion/ Proposed wording of the Indicator	



		No comments		noted
Principle 4	Indicator	Comment	Suggestion/ Proposed wording of the Indicator	
	4.1.1	Verifiers are not normative. If the intent for “ <i>Group Scheme & Large-scale organizations</i> ” is to have documented procedure in place then a separate Indicator should be developed to reflect this, and in association with this verifier.	Consider specific Indicator for Group Scheme & Large-scale organizations	SDG separated indicators
	4.1.1	Verifiers are not normative. If the intent for “ <i>Small-scale & SLIMF organisations</i> ” is to verbally communicate with workers then a separate Indicator should be developed to reflect this, and in association with this verifier.	Consider specific Indicator for Small-scale & SLIMF organisations	SDG separated indicators
	4.1.2	The term “ <i>through culturally appropriate engagement with the local communities</i> ” has disappeared from the wording of the proposed Indicator. This notion of <i>engagement</i> is one of the major changes introduced by the P&C V5 and the IGI. I believe this should be reintroduced in the wording	Consider re-wording in line with initial IGI wording	SDG has included consultation with the local community into the indicator
	4.1.2	The aspect re. “ <i>aspirations & goals</i> ” does not appear in the proposed IGI. I can see how this might be irrelevant	Consider re-wording in line with initial IGI wording	



		in private farms, but what about communal areas or re-settlement farm where IP communities might be living?		
	4.2.1	Same comment as above under 4.1.2 re. <i>culturally appropriate engagement</i>	Consider re-wording in line with initial IGI wording	SDG revised wording
	4.3.1	Verifiers are not normative. If the intent for “ <i>Group Scheme & Large-scale organizations</i> “ is to have policies in place then a separate Indicator should be developed to reflect this, and in association with this verifier.	Consider specific Indicator for Group Scheme & Large-scale organizations	SDG separated indicators
	4.3.1	Verifiers are not normative. If the intent for “ <i>Small-scale & SLIMF organisations</i> “ is to verbally communicate with workers then a separate Indicator should be developed to reflect this, and in association with this verifier	Consider specific Indicator for Small-scale & SLIMF organisations	SDG separated indicators
	4.4.1	This should be identified with communities through <i>culturally appropriate engagement</i>	Consider re-wording in line with initial IGI wording	SDG revised wording
	4.5.1	Verifiers are not normative. If the intent for “ <i>Group Scheme & Large-scale organizations</i> “ is to have a documented SIA in place then a separate Indicator should be developed to reflect this, and in association with this verifier.	Consider specific Indicator for Group Scheme & Large-scale organizations	SDG separated indicators



	4.5.1	Verifiers are not normative. If the intent for “ <i>Small-scale & SLIMF organisations</i> ” is not to have a documented social impact in place but be aware of and mitigate impact then a separate Indicator should be developed to reflect this, and in association with this verifier	Consider specific Indicator for Small-scale & SLIMF organisations	SDG separated indicators
	4.6.1	This should be developed with communities through <i>culturally appropriate engagement</i>	Consider re-wording in line with initial IGI wording	SDG included ‘consultation with local community’
	4.6.4	What about situations where dispute over management activities (e.g. though stakeholders consultation) but no legal case filed? This should also be considered here.	Consider re-wording	Indicator refers to cases of significant magnitude, duration etc. Indicator 4.6.2 refers to disputes communicated through consultations with stakeholders.
	4.7.1 & 4.7.2	Those should be identified with communities through <i>culturally appropriate engagement</i>	Consider re-wording in line with initial IGI wording	SDG re-worded the indicator
Principle 5	Indicator	Comment	Suggestion/ Proposed wording of the Indicator	
	Criterion 5.2	Best available Information is sparse in Namibia on growth & yield, and no national inventory exists that can be used by Organisations to ensure that products are	Consider developing additional Indicators to ensure resources is known and sustainable harvesting is based on tangible & field-	SDG has included clarification to the application of this Criterion in Namibia. The management objective differs between FMUs in Namibia, as the primary objective may



		<p>harvested “<i>at or below a level that can be permanently sustained</i>” as required by Criterion 5.2</p> <p>In this context additional Indicators under this Criterion could be developed to require:</p> <ul style="list-style-type: none"> - (5.2.1) in the 1st instance that a system be put in place to evaluate existing resources through e.g. stem counting, species inventory (en-croacher, protected, etc.), growth estimate per harvestable species, etc. and, - (5.2.2) in the 2nd instance for rate of harvesting (AAC and MAC) and harvesting rotation be defined based on the analysis of information collected under 5.2.1. 	<p>based data in the absence of Best Information available in the country</p>	<p>not be sustainable charcoal production but rather range-land management, etc.</p> <p>Objective would there not include harvesting “<i>at or below a level that can be permanently sustained</i>” as per ADV-20-007-09</p> <p>SDG has revised 5.2.1</p>
	<p>5.2.2</p>	<p>Verifiers: harvesting permits are noted here as verifiers. Harvesting permit give a legal threshold for harvesting, but this threshold is not based on a level that can be “<i>permanently sustained</i>”. This is because information on growth are almost inexistent (see comments above). Alternative verifiers could be resources inventory based on suggestions made above.</p>	<p>Consider alternative verifiers, and in line with additional Indicators as proposed above</p>	<p>SDG has revised indicators</p>



	5.3.1	<p>I don't understand how a budget could reflect "costs & benefits" for mitigation, prevention, etc.? The requirement of the initial IGI is to ensure for financial provisions to exist to mitigate social & environmental negative impacts</p> <p>Guidance regarding positive impacts is unclear.</p>	<p>Consider re-wording of Indicator for clarification, and to be in line with intent of the associated Criterion</p> <p>Consider re-inserting IGI 5.3.2 re. identification of positive impacts in MP</p> <p>Review Guidance notes</p>	SDG has re-worded the indicator to clarify the intent
Principle 6	Indicator	Comment	Suggestion/ Proposed wording of the Indicator	
	Criterion 6.2	<p>SEA and EMP are referenced under this Criterion as potential Guidance & Verifiers. Are those documents compulsory under specific circumstances/scale of impacts? If so could specific Indicators created to request those to be in place?</p> <p>No specific Indicator has been developed under this Criterion for "Small-scale & SLIMF organisations". Could this be considered?</p>	.	SDG clarified guidance. Informal EIA is required by all FMUs. Not to be confused with the EMP required by the SEA.



6.3.3	<p>This Indicator should relate to maximum AAC as defined under indicator 5.2.2 (see also comments above under Indicator 5.2)</p> <p>A specific Indicator could be considered here for SLIMF/low intensity to require a system to be in place to record yield & monitor yield against SLIMF threshold (i.e. 20% max of AAC).</p>	<p>Reference Indicator 5.2.2 in wording of Indicator 6.3.3</p> <p>Consider developing specific Indicator for SLIMF</p>	SDG revised Indicators 5.2.1 and 5.2.2.
6.3.6	<p>Verifiers are not normative. If the intent for “ <i>Group Scheme & Large-scale organizations</i> ” is to have pre & post-harvesting checklists in place then a separate Indicator should be developed to reflect this, and in association with this verifier.</p>	<p>Consider specific Indicator for Group Scheme & Large-scale organizations</p>	SDG separated indicators
6.3.6	<p>Verifiers are not normative. If the intent for “ <i>Small-scale & SLIMF organisations</i> ” is to have an informal system in place but be aware of and mitigate impacts then a separate Indicator should be developed to reflect this, and in association with this verifier</p>	<p>Consider specific Indicator for Small-scale & SLIMF organisations</p>	SDG separated indicators
6.4.5	<p>Control of alien species is covered under Criterion 10.3 in the standard rather than here.</p>	<p>Consider moving this Indicator under Criterion 10.3.</p> <p>Consider further Guidance</p>	SDG agreed



		Guidance: Does a national list of invasive species exists that could be referenced here? Or reference to a data-base such as e.g. http://www.iucngisd.org/gisd/		
	Criterion 6.5	<ul style="list-style-type: none"> Part of the Criterion requires “Where <i>representative sample areas</i>* do not exist or are insufficient, <i>The Organization</i>* shall* restore* a proportion of the <i>Management Unit</i>* to more <i>natural conditions</i>*”. This normative element of the standard is not reflected in any of the Indicators under Criterion 6.5. 	Consider Indicators re-lated to ecosystem restoration	SDG removed this element of the Criterion as it is not applicable in Namibia, where management objective is to restore land by removal of tree species and not vice versa. Criterion 6.6 details responsible silviculture practices Ecosystem restoration covered by separate standard.
	6.5.1	<p>Are “<i>sensitive ecosystems</i>” define as per Guidance i.e. “<i>mountains/hills/ridges; pans; perennial & ephemeral drainage lines</i>”? If so then this should be clearly stated here and included in the wording of this Indicator.</p> <p>What are the “Best Available Information” existing for Namibia to identify “<i>sensitive ecosystems</i>”?</p>	Clarify intent of Indicator, and definition of “ <i>sensitive ecosystems</i> ”	SDG revised the glossary and included reference to the best available information
	6.5.2	If “ <i>sensitive ecosystems</i> ” are defined as per comment above then this Indicator should refer to 6.5.1	Consider re-wording of Indicator (e.g. <i>Buffer zones around sensitive ecosystems* as defined under 6.5.1 are maintained</i>)	SDG revised the wording of the Indicator



	6.5.3	6.5.3 refers to “sensitive areas” while 6.5.1 & 6.5.2 refer to “sensitive ecosystems”. What is the difference? If the same then similar terminology should be used throughout to avoid confusion and clarify intent of this Indicator.	Clarify terminology	SDG agreed
	6.5.3	Criterion 5.3 requires the size of the area to be “ <i>proportionate to...SIR of the management activities</i> ”. Page 9 of the NFSS defines “Large” as >10,000 ha . Therefore should the (10%) threshold be bigger for “Large” scale FMU?.	Consider different threshold for “large” scale organisation	SDG revised minimum thresholds for all scales and sizes of FMUs
	Criterion 6.6	<ul style="list-style-type: none"> A number of useful management options are given under the “Guidance” sections for Indicators 6.6.1 and 6.6.2 in particular. I believe those to be important in the context of certified forest operations in Namibia where knowledge of silvicultural methods is generally lacking. Could those proposed management prescriptions be directly included in the wording of the Indicators themselves? The fact that they are included as Guidelines rather than being part of the wording of the Indicators themselves might prevent for those aspect to be effectively implemented (i.e Guidance in the FSC system is considered to be informative only – See FSC-STD-01-002). 	Consider re-wording of the Indicator to include specific management prescriptions relevant to Namibian savannah ecosystem.	SDG re-worded indicators to include options suitable to management objectives of the FMU



		<ul style="list-style-type: none"> See also my comments under Criterion 10.5 in relation to this topic. 		
	6.6.4	Indicator refers to “ <i>Namibian legislative requirements</i> ”. Can what is meant here be explicated in the wording of the Indicator	Review wording to clarify intent of the Indicator	SDG revised the indicator
	6.6.5	What about the case of game farms? Current wording of this Indicator will prevent them to be compliant.	Either create 2 Indicators or re-word current indicator to cater for case of game farms.	SDG agreed – revised the wording of the indicator
	6.7.3	<ul style="list-style-type: none"> Criterion 6.7 specifically deals with “<i>natural watercourses, water bodies*, riparian zones* and their connectivity</i>” and “<i>water quality and quantity</i>”. So is the intent of this Indicator to prevent use of pesticides in the vicinity of those water systems only? The current wording (i.e. “<i>not permitted for harvesting activities</i>”) let me believe that it is encompassing any activities, and not only the one in the vicinity of water habitats. 	Re-word to clarify intent of the Indicator	SDG dropped Indicator 6.7.3 as it is included in 10.7.3
	Criterion 6.10	<p>Should be removed since the scope of the standard is “natural forest types”</p> <ul style="list-style-type: none"> forest types” 	Remove Criterion 6.10 as n/a	6.10 was removed from the scope as indicated in the explanation with the standard.



Principle 7	Indicator	Comment	Suggestion/ Proposed wording of the Indicator	
	7.1.1	Verifiers are not normative. If the intent for “ <i>Group Scheme & single site (???) organizations</i> “ is to have a documented statement & for it to be publicly available then a separate Indicator should be developed to reflect this.	Consider re-wording of the Indicator	SDG decided that this indicator is applicable to Large organizations and Group scheme’s only
Principle 8	Indicator	Comment	Suggestion/ Proposed wording of the Indicator	
	8.2.3	Annex G referenced here. Should be Annex F	Correct reference	noted
Principle 9	Indicator	Comment	Suggestion/ Proposed wording of the Indicator	
		See comments below regarding the HCV framework		Noted – comments from SDG below
Principle 10	Indicator	Comment	Suggestion/ Proposed wording of the Indicator	
	Criterion 10.3	See comments under 6.4.5 above		SDG noted



	10.5.1	See my comments under Criterion 6.6. SDG should consider developing more prescriptive Indicators in relation to silvicultural practices relevant to savannah’s management in the context of Namibia .		Silviculture practices are dependent on the management objective within each FMU – SDG decided not to prescribe silviculture requirements. Guidance included for farmers to the NCA guideline
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Comments on Annexures:

Annex D

Refers to “*Traditional and/or corrugated housing and/or tents**”, and gives flexibility for tent to be used if workers are “*at a lengthy distance from a permanent structure*”. In my experience auditing in Namibia most farms do not have “*permanent structure*” in place to accommodate workers in the 1st place. So if required to comply with Indicator 2.3.7 & Annex D some Organisations might then use this loophole to establish workers ‘camps made of tents only, and won’t consider any other alternatives.

Term used here is “must”. Could this be “shall” if intent is for this list to be normative rather than indicative?

SDG revised wording within Annexure

Annex G



This is a list of acronyms and website, and not a framework that can guide an organisation in the identification/management/monitoring of HCV

SDG developed Framework

Annex H

What is the relevance of this list? Is it in relation to HCV 6? This needs clarification.

This refers to HCV 6 – SDG included reference in the Annexure heading