



Record of ALL comments received per Indicator – compiled on 25/10/2018

Principle 1	Indicator	Stakeholder	Comment	Suggestion/ Proposed wording of the Indicator	SDG Response <i>As per Frank Detering, compiled for Meeting 30th October 2018</i>
	1.2.1	CMO Logistics	Can also be a management contract instead of a lease	Add: Management contract	Added into verifier
	1.2.2	CMO Logistics	In the vast Namibian landscape boundaries are often fence lines	Add fence lines for SLIMF	Added to verifier
	1.6.1 Z	CMO Logistics	Word missing	“engagement* with affected stakeholders”	Corrected in indicator
		Saligna Development Company	No objection to content		No action required
Principle 2	Indicator	Stakeholder	Comment	Suggestion/ Proposed wording of the Indicator	SDG response
	C 2.1	Soil Association	No more reference to contracts between farm manager/owner and workers. Could the SDG give consideration under this Indicator for cases where workers are employed (e.g. under contract with farm	Provide Indicator under Criterion 2.1 to cover for agreement/contract requirements between employer and employee	Labour Act, 2012, as amended, Article 128a



			owner) and where workers are self-employed.	as per labor law in Namibia	Covered in Indicator 1.3.1, included within indicator in 2.1.4
	2.1.4Z & 2.1.4S	Soil Association	I can't see the difference in the wording between those 2 Indicators?	Clarify difference of intent between 2.1.4Z & 2.1.4S	Removed S version of this indicator and revised wording in 2.1.4
	2.2.1	Stakeholder workshop – Windhoek	1. Change: 2.2.1 – worst forms of child labour		Included the definition into the Glossary
	2.2.1	Stakeholder workshop – Otjiwarongo	1. Change: 2.2.1 – worst forms of child labour		As above
	Leave payment	Stakeholder workshop – Windhoek	2. Payment of leave not taken – charcoal contract workers, confusion over contract workers vs employed workers in them taking leave. As per the Collective Agreement, 3% of the charcoal produced		To be emphasized during calibration workshop – how the legal requirement (labour act) is met should be determined by the land manager/owner.
	2.3.3. PPE	Stakeholder workshop - Otjiwarongo	Should all PPE be free of charge or one set per annum as per the Labour Act		As per Labour Act, PPE is to be provided.



	2.2.1 S	CMO Logistics	No formal job descriptions are required for SLIMF	Remove “ Job descriptions ”	the verifier states interviews with workers – so no formal job description required. Clarified wording in verifying
	2.3.5	Stakeholder workshop – Windhoek	7. Ensure the 2.3.5 guidance is correct – the accessibility of National Risk Maps on HIV and AIDS, and TB		Website links to resources are included in the Guidance
	2.3.6	Soil Association	Annexure D: <ul style="list-style-type: none"> - Item 10: This item is misleading, and in my view should be remove. Indicator 2.3.6 in the context of certified operations in Namibia applies to charcoal workers being in the field for lengthy amount of time. Annex D has been developed by the SDG to provide clear requirements as to the standard required for workers accommodation in this context. So why adding this item which is ambiguous as it suggests that this option might be acceptable? - Item 13: Could this be re-worded for clarity? 	Item 10: Remove Item 13: re-word	10. The use of tents are described further within the footnote in Annex D – stipulation is limited to temporary use. 13. Farm Manager/ Owner is responsible for the transportation of sick workers* and sick family members of workers* to the nearest hospital and/or clinic, as required by ILO



		Saligna Development Company	No objection to content		No action required
Principle 3	Indicator		Comment	Suggestion/ Proposed wording of the Indicator	
		CMO Logistics	No comments		No action required
		Saligna Development Company	No objection to content		No action required
Principle 4	Indicator		Comment	Suggestion/ Proposed wording of the Indicator	
		CMO Logistics	No comments		No action required
		Stakeholder workshop - windhoek	Can you consult your neighbours verbally?		Yes, the current draft states that no records required except for disputes for both SLIMF and non-SLIMF
	C4.8	Stakeholder workshop – windhoek	4.8: Re-instate IGI for Traditional knowledge and intellectual property.		IGI reinstated



		Saligna Development Company	No objection to content		No action required
Principle 5	Indicator		Comment	Suggestion/ Proposed wording of the Indicator	
	5.1.2	CMO Logistics	Under verifier: NTFP permits are mentioned, but “hunting permits” could be specifically added due to its prominence in Namibia	Add “NTFP permits, e.g. hunting permits ”	Criterion states diversified products and benefits – added the hunting permit under the verifier
	5.2.1	Soil Association	Remove the word “For” at the beginning of the sentence		Amended the sentence
	5.2.1	Soil Association	I believe the intent of 5.2.1 (judging on the guidance provided) is to obtain a baseline of the resources (NTFP or timber) available. If so the term “ <i>harvesting level</i> ” is incorrect as it refers to harvesting yield rather than the actual evaluation (e.g. through inventory or other methods) of the actual NTFP or timber resource.	Clarify intent of Indicator 5.2.1 through re-wording of Indicator	Changed wording - Organisations shall quantify the timber and NTFP resources, based on current Best Available Information* on growth and yield; inventory of the forest*; density data models*, mortality rates. This shall be based on the Management Objectives of the FMU.



	5.2.1	CMO Logistics	<p>Under verifiers:</p> <p>Use hunting permit to determine number of species that may be hunted</p>	<p>Under verifiers: Add “Hunting permit species numbers”</p>	<p>Added NTFP permit conditions which covers hunting</p>
	5.2.1	CMO Logistics	<p>Under verifiers: Stem count per ha of target species is not the only acceptable way of determining available biomass and should not be a verifier for SLIMF. The way this is written auditors may enforce this as what shall be done, which needs to be avoided.</p>	<p>Under verifiers: Add “Stem count per hectare of target species (excl. SLIMF)”</p> <p>It may also be too much for “Z” farms, in which case one can add the word “or” after Stem count per hectare of target species</p>	<p>Amended - Scientific field assessment of resource – options to be determined by landowner/manager</p>
	5.2.2	Soil Association	<p>What is meant by “<i>FSC integrated management plan</i>”?</p>	<p>Clarify meaning of “FSC integrated”</p>	<p>Changed wording - The Organisation shall determine the maximum allowable annual cut based on the results of 5.2.1. This shall not negatively impact environmental values and is done as part of a Management Plan based on the FSC P&Cs</p>



	5.2.2	Soil Association	A specific Indicator should be considered here (i.e. 5.2.2 S) to reflect SLIMF/low intensity threshold defined in this standard as <20% of the MAI.	Add separate indicator for SLIMF/Low intensity	Requirement still needs to be met regardless of Slimf status. SDG confirmed that the current indicator suffices.
	5.2.2	CMO Logistics	“Refer to Glossary for Density Data Model Data Models for Rangeland Management and for Sustainable Timber Production” should be a recommendation as there are other means to establish available biomass – especially for SLIMF	Add “ Recommendation ” to the guidance statement.	This is under Guidance – it is not normative and is a recommendation for source of information
	5.2.3	Soil Association	In order to ensure adequate monitoring of charcoal production (and charcoal transaction) an additional aspect should be considered within/along with this Indicator i.e. compare/reconcile harvesting records with allowable cut as determined under 5.2.2	Suggest creating a separate Indicator (i.e. 5.2.4) to require reconciliation of figures between allowable cut and harvesting yields, and for any deviation to be justified.	Amended to include ‘...and reconcile against planned volumes’
	5.3.2	CMO Logistics	Key examples of positive impacts are employment and restoration of bushveld	Add Employment and restoration as examples	added to Guidance



		Saligna Development Company	No objection to content		No action required
Principle 6	Indicator		Comment	Suggestion/ Proposed wording of the Indicator	
	6.1.1	CMO Logistics	We need to add “Environmental baseline risk assessment” as a verifier	Add “ Environmental baseline risk assessment ” as a verifier	Removed the word “Rapid” to accommodate both types of Risk Assessments, baseline and intermittent changes
	6.2.1	Stakeholder workshop - windhoek	Proposed Change to Standard: Justification for 6.2.1 needs to be widened to include all types of forests.		The justification for the indicator is not included in the NFSS
	6.2.1	Stakeholder workshop - otjiwarongo	6.2.1.Z -- need to include ‘impact assessment’		Revised wording in indicator and verifier
	6.2.1Z	CMO Logistics	Not sure what “authorised harvesting schedule.” Refers to	Elaborate a bit on what meaning of “authorised harvesting schedule.”	As above



	6.3.4	CMO Logistics	Management activities are implemented to avoid the harvesting of protected trees is not totally correct as the permit may allow this. The verifier states “permit conditions”, but will it be interpreted correctly by the auditors?	Add “Management activities are implemented to avoid the harvesting of protected trees, unless allowed by harvesting permit ” to the indicator	amended accordingly
	6.4.1	CMO Logistics	The following is excessive for SLIMF: Guidance: Appropriate literature review (e.g. Atlas of Namibia; Biological Diversity of Namibia, Mammals of the Southern African sub-region; Snakes & other reptiles; Frogs of Southern Africa; Roberts Birds of Southern Africa; Namibia Red, Rare & Endemic birds; Trees & Shrubs of Namibia; Red Lists, etc.) EIS (www.the-eis.com) MET; Forestry; NBRI; Consultants; local research institutions Vertebrate fauna & flora lists (including RT&E spp.)	Change to: SLIMF: “List of potential presence of endangered plants, mammals and birds and indication of those that have been positively identified in the FME”	This activity may be carried out by the GS or RMU manager on behalf of SLIMFs – via desktop review. SDG included reference to website and other types that recommendations which is freely accessible
	6.4.2	CMO Logistics	Baseline Environmental risk assessment needs to be added as the key verifier	Add “Baseline Environmental risk assessment” as a verifier	Amended wording
	6.4.3	CMO Logistics	Not a requirement for SLIMF:	Add: “Connectivity shall be allowed within the FMU	Revised Indicator - The rare and threatened species* and their habitats* are protected, including through the



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			<p>“Connectivity shall be allowed within the FMU and shall only be prevented with approval from Ministry of Environment and Tourism.” As this will force farmers to spend significant amounts of money fruitlessly on consultants to obtain approval from MET</p>	<p>and shall only be prevented with approval from Ministry of Environment and Tourism. (not applicable to SLIMF)”</p>	<p>provision of conservation zones*, protection areas*, and other direct means for their survival and viability, such as species’ recovery programs. Connectivity shall be encouraged within the FMU.</p>
	6.5.1	CMO Logistics	<p>What is NBRI</p>	<p>Write out “NBRI” - National Botanical Research Institute</p>	<p>added to verifier with website link</p>
	6.5.2	Stakeholder workshop – otjiwarongo	<p>2. 6.5.2. Termite mound is not a sensitive ecosystem – but micro-habitat</p> <p>3. 6.5.2 need to clarify buffers in terms of legislation</p>		<p>Amended note in 6.5.1.</p> <p>100m from rivers as per legislation (Forest Act)</p> <p>(1) Unless otherwise authorised by this Act, or by a licence issued under subsection (3), no person shall on any land which is not part of a surveyed erven of a local authority area as defined in section 1 of the Local Authorities Act,</p>



					<p>1992 (Act No. 23 of 1992) cut, destroy or remove -</p> <p>(a) vegetation which is on a sand dune or drifting sand or on a gully unless the cutting, destruction or removal is done for the purpose of stabilising the sand or gully; or</p> <p>(b) any living tree, bush or shrub growing within 100 metres of a river, stream or watercourse.</p> <p>(2) A person who wishes to obtain a licence to cut and remove the vegetation referred to in subsection (1) shall, in the prescribed form and manner, apply for the licence to a licensing officer who has been designated or appointed for the area where the protected area is situated.</p> <p>(3) may- (a) On receipt of an application made under</p>
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					<p>subsection (2) a licensing officer</p> <p>subject to an applicable management plan if any, or to a notice creating a protected area; and</p> <p>(b) where he or she is reasonably satisfied that the cutting and removal of vegetation will not interfere with the conservation of soil, water or forest resources; issue a licence which authorises the holder to cut and remove the vegetation in question.</p> <p>(4) A licensing officer may require the holder of a licence issued under subsection</p> <p>(3) to plant vegetation on the land in question or impose conditions which are reasonable and necessary in the circumstances.</p>
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					(5) The Minister may, by regulation, declare any plant or species of any plant to be a protected plant and shall impose conditions under which that protected plant shall be conserved, cultivated, used or destroyed by any person. (6) No person shall do anything which is contrary to a condition imposed under subsection (5).
	6.5.3	Soil Association	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 Also the glossary refers to “sensitive ecosystems” not “sensitive areas”.	Use same terminology throughout to avoid ambiguity	Sensitive ecosystems is the correct terminology - corrected in NFSS



6.5.3	CMO Logistics	Sensitive Areas* in combination with other components of the conservation areas network* comprise a minimum 5% area of the Management Unit* - the above sentence is allowed at landscape level for SLIMF	Add: "SLIMF: 5% may be calculated at landscape level as defined in FSC STD 30-005".	SDG agreed, aligned standards
6.6.2	CMO Logistics	"(including encroacher species)," Should be removed as it is not always true	Remove: "(including encroacher species),"	removed the 'encroacher species from the indicator
6.6.6	CMO Logistics	A system of regular and punctual controls to ensure hunting policies are respected is implemented Above is a clumsy sentence	Reword: Implement a system of regular and punctual controls to ensure hunting policies are respected	Indicator revised accordingly
6.7.2	Soil Association	"depending on slope gradient" this is too vague & will be subjected to interpretation (either by Organization or auditor) if not clearly define. Please clarify	Avoid use of threshold to prevent subjectivity, or clarify gradient scale	Removed slope gradient. No site disturbance within 100m as per Forest Act
6.7.2	Soil Association	"Site disturbance": what is meant here? Criterion 6.7 specifically related to water ecosystems. Does it mean no harvesting activities?	Clarify intent of indicator	Included in Glossary - Site Disturbance: Any activity which detrimentally affects perennial/ephemeral rivers/drainage lines; omaramba's; pans; fountains (e.g. all forms of harvesting,



					road construction, chemical application, etc.).
	6.7.2	CMO Logistics	This is not practical the way it is written. We have used the rule of “width of the river/stream and 5m around a pan. It is also far to onerous to keep a buffer of 50m in virtually all cases we have encountered in Namibia. The effect of such a large buffer could have more negative than positive environmental effects in biodiversity. The idea is to rehabilitate the bush to its original state – not to leave excessive amounts of bush encroachment that defies the management objective at the expense of the environment	Change the sentence to: “Site disturbances do not occur within the buffer zone of the sensitive areas as defined by the FME. E.g. maintain a buffer that is at least the width of a steam or river”	Legal requirement states 100m – Forest Act No. 12 of 2001 – detailed in earlier comment.
	6.7.3	<i>Soil Association</i>	“ <i>depending on slope gradient</i> ” this is too vague & will be subjected to interpretation (either by Organization or auditor) if not clearly define. Please clarify	Avoid use of threshold to prevent subjectivity, or clarify gradient scale	Removed slope gradient
	6.7.3	Soil Association	The Guidance of this Indicator refers to “ <i>after-care</i> ”. This Indicator is referred back under Indicator 10.7.3 which also stipulates after “ <i>after-care</i> ” but in the body of the Indicator rather than under the Guidance	Clarify intent of Indicator 6.7.3. If appropriate remove Indicator 6.7.3	Removed guidance. This is not limited to after-care but protection of water resource.



			<p>(which is not normative). So not clear what exactly the intent is.</p> <p>If the intend is to restrict use of chemicals for “after-care” operations only then suggest Indicator 6.7.3 to be removed as already covered under Indicator 10.7.3.</p>		
	6.7.3	CMO Logistics	<p>This is not practical. The Soil Association standard talks about 10m, which is internationally accepted. In a dry country like Namibia it would be more important to have a control measure that refers to the rainy season. See also 6.7.2 above</p>	Change 50-100m to 10m	As above
	10.12	Stakeholder workshop – otjiwarongo	<p>10.12 Chemical containers – need to include legislation reference, options in guidance to discard containers</p>		<p>Added to Guidance: Occupational Health and Safety in Namibia, governed by the Labour Act Nr 11 of 2007 in conjunction with Regulation 156</p> <p>Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies Act 36 of 1947 (SA) (SA GG 3834)</p>



	6.6.1 – glossary	Stakeholder workshop – otjiwarongo	Use of roller on FSC land – mosaic approach, straight lines in mechanised operations allowed		<p>Mechanised operations are allowed, within acceptable environmental practices. Straight lines within harvesting area are allowed but boundaries of harvested areas not to be straight as this affects the ecotone & ecological practices.</p> <p>Added to Glossary;</p> <p>Mosaic approach: Harvesting should ensure a mosaic of patches that differ in size, shape, composition, history, and boundary characteristics. This emphasizes dynamics of heterogeneity within a system (i.e. that each area of an ecosystem is made up of a mosaic of small 'sub-ecosystems').</p>
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		Saligna Development Company	No objection to content		No action required
Principle 7	Indicator		Comment	Suggestion/ Proposed wording of the Indicator	
	7.4.1	CMO Logistics	The management plan in the Namibian charcoal; burning context is rolling annual updated plan	Suggest that 5-year is removed	SDG disagreed. Guidance includes minor updates where significant changes are made annually
	7.5.1		If the certified FME chooses to make the whole management plan available, then a summary is not required.	Reword to capture this, as it is the way it is done most often in Group scheme certificates	Revised wording in indicator to include 'full or summary'
		Saligna Development Company	No objection to content		No action required
Principle 8	Indicator		Comment	Suggestion/ Proposed wording of the Indicator	
	8.5.2	CMO Logistics	Should the indicator not explicitly state that the FSC100% claim should be shown as well as the certificate code also on delivery notes?	Add claim and certificate number as requirements to 8.5.2	Already covered under Point 6 in 8.5.3.



Principle 9	Indicator		Comment	Suggestion/ Proposed wording of the Indicator	
		CMO Logistics	No comments		No action required
		Saligna Development Company	No objection to content		No action required
Principle 10	Indicator		Comment	Suggestion/ Proposed wording of the Indicator	
	10.1.1	Soil Association	Review last sentence of the Indicator (i.e. unclear wording)	Review wording of Indicator	amended
	Criterion 10.2	Soil Association	Rationale given for n/a of the Criteria is unclear. Regeneration of species can be done through coppicing	Clarify rationale	Natural regeneration covered in 10.1
	10.3.1	Soil Association	If the intent is to eradicate alien species, then an additional Indicator should be included to prohibit their introduction in the 1 st place	Include additional Indicator to prohibit alien species introduction	10.1 and 10.2 cover this aspect sufficiently. Illegal to introduce Invasive alien species.
	10.5.1	CMO Logistics	Density Data Models* shall be applied.		Included as a verifier.



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	10.6.1	CMO Logistics	100m from riparian zone is excessive. Reduce to the same buffer as what is applied for harvesting in P6	Use to the same buffer as what is applied for harvesting in P6 in this indicator for fertilizers	Legal requirement, as above (Forest Act)
	10.7.3	Soil Association	Unclear what is meant by “manipulate landscape”? If intent is to confine use of chemicals to “after-care” operations only then this should be made clearer	Clarify intent of Indicator	Amended - Pesticides are utilised for specific operational activities as per management objectives
	10.7.3	Soil Association	<i>“Application shall be ecologically appropriate in relation to the management objectives”</i> . This is very vague and this addition to Indicator 10.7.3 makes for a long Indicator	Suggest creating a separate and clarify intent of <i>“ecologically appropriate”</i>	As above
	10.7.3	Stakeholder workshop- otjiwarongo	1. Clarification on the use of pesticides on firebreaks and roads is needed		Included in Guidance in Indicator
	10.7.3	Stakeholder workshop – Windhoek	1. Pesticide use on using for firebreak and ‘poaching’ preparation prior to harvesting ----needs to be in management plan. Minimum of 15m in width.		As above, in guidance
		Saligna Development Company	No objection to content		



Annexes	Annex paragraph		Comment	Suggestion/ Proposed wording of the Indicator	
	Annex B	Stakeholder workshop - windhoek	<p>2. Annex B: Training. Refer to the MAWF/MET booklet on how to comply with the Acts titled: “Forestry and Environmental Authorisation Process for Bush Harvesting Projects, 2017.”</p> <p>3. Consider the note ‘ may be allocated’ in Annex B ---not all training required by workers*</p>		Included in footnotes in Annex B and reference for training
	Annex C	Stakeholder workshop - windhoek	<p>3. 18cm trees to be added to height of trees</p> <p>4. Point 8 Annex C – need to elaborate 1 first aider per 10 people by accredited trainer</p> <p>5. Gum boots and/or canvas and/or safety boots – cotton/leather gloves ---refer to Act, don't specify the boot. Similar to overall....no prescription to type of overall. SDG response – risk assessment identified where ILO is met and where not, need to be prescriptive to ensure right correct of boot is used. Sufficient guidance is required. PVC Gloves – to be considered.</p>		<p>The SDG did not agree to add diameter to justification of risk matrix; (C2.3, height at 4.5m)</p> <p>Clarified the First Aider ratio to number of workers.</p> <p>PVC gloves not appropriate for charcoal burning operations.</p>
	Annex C	Stakeholder workshop – otjiwarongo	<p>2. Annex C – include “PVC” gloves under chemical operations</p>		Clarified the requirement for PVC Gloves for chemical operations



	Annex c	CMO Logistics	<p>Rather follow what is on the MSDS sheet instead of prescribing what is required. Huge variability between different chemicals</p> <p>6. The following protective equipment SHALL be provided for Chemical operations: Consult the Chemical Label to ensure compliance</p> <ul style="list-style-type: none"> a. Overalls which are impermeable to the chemical b. Eye protection c. Gloves d. Gum boots e. Respiratory mask, where required by the Chemical Label 	<p>Replace:</p> <p>“6. The following protective equipment SHALL be provided for Chemical operations: Consult the Chemical Label to ensure compliance</p> <ul style="list-style-type: none"> a. Overalls which are impermeable to the chemical b. Eye protection c. Gloves d. Gum boots e. Respiratory mask, where required by the Chemical Label” <p>with the following:</p> <p>Adhere to prescriptions contained on the chemical's MSDS.</p>	SDG agreed, clarified in Annex C
	Annex C	CMO Logistics	<p>The following is excessive (especially for SLIMF) under 8b. The likelihood in terms if a risk-based approach is negligibly low and does not warrant unnecessary expenditures</p> <ul style="list-style-type: none"> ii. Burn shield iv. Emergency blanket 	<p>Remove Burn shield and risk from 8b in Annex C</p>	<p>First Aid must follow legal compliance (OHS Act).</p> <p>Emergency blanket removed from the list.</p>



	Annex D	Soil Association	See my comments under Indicator 2.3.6		As attended to, 2.3.6.
	Annex D par 2	CMO Logistics	Add “not more than 6 persons per room, as stipulated in ILO Code “not overcrowded” is subjective	Replace “overcrowded” with “not more than 6 persons”	Amended to as per ILO Housing guidelines.
	Annex D par 5	CMO Logistics	200 m away from charcoal processing related dust is excessive – change to 100m	Replace 200m to 100m	One (1) km away from charcoal burning (as per Forestry Permits); and 200m for sifting operations (OHS Regulations for milling and related operations).
	Annex D par 6	CMO Logistics	10 people is extremely excessive – will not even be found in an office complex in Windhoek	Replace 10 persons with 25 persons	ILO stipulates 1:6 for toilets; but SDG proposed 1:10 to remain in line with government policy guidelines.
	Annex D	Stakeholder workshop – windhoek	8. Annex D – toilets not being used, culture awareness - perhaps move away from structured toilets and include option to move away from ILO based on current use and agreement from workers* (effective non-pressurized engagement*)		As above
	Annex D	Stakeholder workshop – otjiwarongo	3. Annex D – specify minimum size of housing and number of toilets, availability of males and females facilities or could verbal confirmation be more practical? need to		As above, housing dealt with under IGI 2.3.6 and Annex D.



			<p>consider local customary use of toilets</p> <p><i>Cooking facilities (shade areas to be able to cook in shade and when raining)</i></p>		<ul style="list-style-type: none"> - Density standards are expressed either in terms of minimal volume per resident or of minimal floor space. Usual standards range from 10 to 12.5 cubic metres (volume) or 4 to 5.5 square metres (surface). - A minimum ceiling height of 2.10 metres is provided. - In collective rooms, which are minimised, in order to provide workers with some privacy, only a reasonable number of workers are allowed to share the same room (2 -8 workers). <p>Cooking facilities non-negotiable as per ILO</p>
	Annex F	Soil Association	<ul style="list-style-type: none"> - General comment: Could this annex be tailored to address specific requirements for SLIMF category? Something similar to Annex E which provides 2 columns (Non 		<p>SDG noted the comment, but disagreed. The Monitoring listed in Annex F is required to some level by SLIMF and</p>



			<p>SLIMF/SLMF) for each elements. E.g. under item 5 records of dispute resolution doesn't need to be documented for SLIMF organisation, while it is for other organisations as per Indicator 4.6.3 of the draft NFSS</p> <p>- Item 2: Plan versus Actual... What? I think a term is missing here..? Please check wording.</p>		<p>non-SLIMF. This Annexure does not relate to the record keeping, only to the type of monitoring required.</p> <p>Item 2 – Word “volume” was added</p>
	Glossary	Soil Association	<p>- “Sensitive ecosystems”: Was the intent to the SDG to be restrictive in terms of what constitutes “sensitive ecosystems” in Namibia, or is this intended to be a potential list of sensitive sites?</p>		<p>Sensitive Ecosystems* already in glossary, This was intended to be a potential list.</p>
	SLIMF	Soil Association	<p>- Considering that the SDG has considered that SLIMF “small” is defined as <100 ha then in effect only SLIMF “low intensity” will apply in the context of Namibia.</p> <p>- Was it really the intent of the SDG to set the threshold for SLIMF “small” so low? The previous draft version gave a threshold of <5,000 ha... This seems like a massive change and the rationale for this is rather unclear...</p>		<p>The SLIMF criteria was sent out to current certificate holders to consider. Pending finalization.</p> <p>In terms of defining small – the calculation of 5250ha is included, but is pending finalization.</p>



	General	CMO Logistics	<p>Job well done.</p> <p>We just need to tone down some of the requirements which bring no significant social or environmental benefits but has significant economic implications – these have been reflected in the evaluation above. In some cases, there are excessive environmental requirements because the traditional harvesting approach is being considered by the compilers instead of rehabilitation of bushveld. Such requirements do in some cases lead to the opposite result than what is desired in the standard – for example excessive buffers have a definite negative impact on forest restoration and therefore biodiversity.</p> <p>If this standard is to also apply to native forest harvesting (e.g. miombo woodlands in the northern parts of Namibia) then I would support most of the stricter environmental and social requirements that are reflected in the standard as it stands in this draft. These are typical harvesting operations and not forest restoration activities, where environmental impacts in particular need to take a precautionary approach.</p>		<p>Thank you!</p> <p>FSC Nam Standard will accommodate all types of forest operations, including natural forest and non-timber forest products.</p>
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	Risk Based Approaches and Risk Designations per indicator	Stakeholder workshop- Windhoek	<ul style="list-style-type: none">• It will help the operation to prioritise the key risk indicators although you still have to be compliant with all aspects of the standard.• It will reduce auditor time and therefore costs.		Noted. SDG will be release summary of risk designations per indicator in November – January for 60 days.
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