

Intact Forest Landscapes

A Forest Stewardship Council® (FSC®) discussion paper

Dr Owen Davies
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0 Executive summary

The concept of Intact Forest Landscapes (IFLs) was first applied in Russia in the early 2000s before being adopted as the basis for a global mapping initiative by an IFL Mapping Team. Data sets are now available for IFL extent in 2000, 2013, 2016 and 2020.

An Intact Forest Landscape is defined by the IFL Mapping Team as an unbroken expanse of natural ecosystems within the zone of current forest extent, showing no signs of significant human activity and large enough that all native biodiversity, including viable populations of wide-ranging species, could be maintained. Technical aspects of the definition include a minimum area (50,000 hectares), and a distinction is made between areas with evidence of certain types of human influence that are considered disturbed and consequently not eligible for inclusion in an IFL, and areas with evidence of low-intensity and old disturbances that are treated as subject to “background” influence and are eligible for inclusion in an IFL.

As the definition suggests, IFLs are valuable for the conservation of biodiversity, but they are also important for ecosystem services such as carbon storage. Published results gave the area of IFLs in 2000 as 12.8 million square kilometres, and showed that the area had decreased by 919,000 km² by 2013, mostly in tropical regions. Threats to IFLs include logging, agricultural expansion, and fragmentation by roads, pipelines and other infrastructure associated with mining and oil and gas extraction.

Even before the introduction of the IFL concept, the FSC system required the maintenance or enhancement of globally, regionally or nationally significant large landscape level forests. At their General Assembly in 2014, however, FSC members passed a motion on IFL protection, and IFLs were explicitly incorporated into the definition of one of the categories of High Conservation Value (HCV) recognised by FSC. At the heart of the motion was a requirement for Forest Stewardship Standards “to protect the vast majorities of IFLs”. The motion further specified that protection measures must be implemented in core areas, and included a default requirement, defining the core area as an area of forest comprising at least 80% of the IFL falling within a certified management unit, which would apply if a relevant Forest Stewardship Standard had not been implemented by the end of 2016.

The motion was controversial even before it passed, as it was felt to largely ignore the role of Indigenous Peoples, an issue only partly resolved by last minute changes. It was also widely misunderstood, with many members in tropical countries believing that the description of IFLs was compatible with reduced impact logging, for example. Concerns about implementation arose almost immediately, and at the General Assembly in 2017 FSC members passed another motion calling for regional assessments of the short and long-term impacts of IFL management and protection measures. When reports for four geographical areas were completed in 2020 and 2021, they found only very small proportions of the total IFL areas subject to FSC certification (0.6% in Brazil, 7% in Canada, 1.4% in the Congo Basin, and 2.3% in Russia), and flagged issues with potential contract breaches for

concessionaires, the risk of losing certificates due to uncompensated revenue loss, reductions in local employment and less investment in services for workers and communities.

In the meantime, implementation of IFL requirements continued. The related concept of Indigenous cultural landscapes was also introduced to the FSC system. Another motion was passed at the 2022 General Assembly which highlighted the lack of alignment between FSC's approach to IFLs and the lessons learned since 2014, and called on FSC to focus efforts on effective landscape-level conservation of IFLs and to relieve certificate holders from some of the restrictions on management which were seen as counterproductive. This resulted in pilot processes in Brazil, Canada, Peru and the Republic of the Congo, which are still ongoing.

Implementation of IFL requirements remains a challenge in 2025, and the FSC Board of Directors has recently approved two temporary exemptions from requirements to avoid losses in certified area while pilot processes are underway. More IFL-related motions have been proposed for the 2025 General Assembly. Recognising the need to enter into broader discussions with the membership about the overall role that FSC can play in the definition, management and protection of IFLs, including beyond the instrument of certification, the Board mandated the development of this discussion paper.

Interviews with and written submissions from a range of stakeholders revealed diverse and divided opinions, although there was widespread acknowledgement that FSC's current approach to IFLs was not working, whether stakeholders viewed it from primarily economic, environmental or social perspectives. Proposals for discussion were developed taking into account:

- The lack of stakeholder agreement on even the most fundamental aspects of the topic.
- The need to build broad stakeholder understanding and agreement, but equally the need to take urgent action to maintain the viability of the FSC system in some settings.
- The diversity of opinions on certification solutions.
- The existing provisions of the FSC system.
- The limits of certification solutions and the potential for FSC to take other actions.

Three proposals are provided for discussion:

- The first is based on robust implementation of the core area threshold-based approach to IFL protection, in response to feedback from some members of the environmental chamber that Motion 65 has never been implemented as it was originally intended. This includes a consideration of funding mechanisms which is also relevant to the second proposal.
- The second responds to the majority of stakeholder feedback which suggests that the threshold-based approach to IFL protection has been counterproductive. In the short term, it proposes halting the implementation of specific IFL normative requirements, and instead focussing on developing and implementing robust National HCV Frameworks, acknowledging that this would require a reconsideration of what it means to protect IFLs. In the medium term, it proposes the development of a formal policy on IFLs, and, in the longer term, the alignment of the FSC normative framework with the policy. A draft policy is provided as a starting point for discussion.
- The third addresses cross-cutting social issues: securing tenure for Indigenous Peoples, culturally appropriate alternatives to the concept of intactness, socio-economic implications of IFL protection, and unsustainable and inequitable consumption.

1 Contents

Section 3 provides an outline summary of the background to this discussion paper. Sections 4 and 5 provide more detailed background about the Intact Forest Landscape concept and its use in the FSC system. While it is hoped that these sections will be useful to all readers of this paper, those who are already familiar with the topic might choose to skip directly to section 6, which summarises a range of stakeholder views, and section 7, which suggests possible ways forward.

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The information gathering phase included reviewing published material identified as relevant by FSC International or stakeholders, supplemented by a small amount of material identified by the author (mostly original sources for some of the material provided by stakeholders). While the material covered a wide range of topics and geographies, this review should not be considered exhaustive or definitive.

The proposals presented in this paper should not be attributed to any of the individuals with whom I have spoken; they are my own syntheses of what I have heard, and I alone am responsible for them.

Note on the second draft

This revised second draft was produced based on feedback from the Focus Forests Advisory Group, the IFL Consultative Forum, and the FSC secretariat (with special thanks due to Stefan Salvador).

Minor refinements have been made to sections 3, 4 and 5. Stakeholder views and proposals for discussion are now in separate sections (sections 6 and 7 respectively). The original summary of stakeholder views from the first draft has been moved to Annex C, and a shorter summary with commentary is now included in the main text (section 6.1).

The first draft included three scenarios, which were not intended as viable options but as illustrations of the outer limits of stakeholder views; the logic behind this was that any viable solution would have to fall somewhere between those three scenarios, and the proposal for discussion was made on that basis. However, it was evident from some of the feedback received that this was not explained clearly enough. Therefore, these scenarios have been removed from the consideration of stakeholder views in section 6, but an expanded range of proposals is now presented in section 7.

The original proposal for discussion received broad support from stakeholders who commented on the first draft, and has been retained with various minor amendments (section 7.2). As an alternative, prompted by negative feedback on the original proposal from some members of the environmental chamber, a separate proposal for maintaining threshold-based protections for IFLs has also been included for discussion (section 7.1). Cross-cutting social considerations which could apply to any approach to IFL protection have been included in a third proposal (section 7.3).

At the request of the FSC secretariat, a starting point for discussion of the policy suggested in the original proposal has been added as Annex D.

3 Why are we having this discussion?

Anyone who supports FSC is well aware of the importance of forests. Among many things, they are reservoirs of life, stores of carbon, drivers of water and weather cycles, homes and means of subsistence for Indigenous Peoples and other communities, and sources of widely traded wood and non-wood products. The range of values we recognise in forests, and the need to balance them, is reflected in FSC's mission to promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

Intact Forest Landscapes (IFLs), first defined in the early 2000s, are a subset of primarily forested areas characterised by their scale and minimal human disturbance, i.e. what is understood as their "intactness". These characteristics make them exceptional in terms of many of the values we associate with forests, particularly biodiversity; IFLs are defined on the basis that they are large enough to maintain all native biodiversity, including viable populations of wide-ranging species.

However, it is important to acknowledge from the outset that the concept of intactness is controversial. Although background human influence, including shifting cultivation and low-intensity selective logging, does not prevent an area from being identified as an IFL, some still criticise the idea of intactness as representing a Western conservation mindset which artificially separates humans and nature. Many IFLs overlap with territories of Indigenous Peoples and local communities whose traditional stewardship practices have helped, not hindered, the preservation of forest. The concept is also controversial for the restrictions it places on modern economic activity, as even relatively low impact timber harvesting can compromise intactness as currently defined. The scale of IFLs means that they are often seen as huge, largely untapped sources of products and wealth; if some areas have been legally protected by governments, this only increases the pressure to exploit the remaining areas.

In this challenging context, through a motion passed at their General Assembly in 2014, FSC members committed to "protect the vast majorities of IFLs". Unsurprisingly, given the challenges, the realisation of this commitment has been difficult. In particular, in most settings it has not yet been possible to reconcile the protection of large proportions of IFLs with the economic realities faced by certificate holders, especially concessionaires, with negative economic impacts generally expected to lead to negative social impacts. Subsequent member motions have tried to resolve this impasse, and continue to do so, with more IFL-related motions put forward for the 2025 General Assembly.

There is now a sense of urgency. On the one hand, environmental stakeholders are frustrated by FSC's failure to protect significant areas of IFLs; some because protections are not strict enough, others because protections are driving IFL areas out of certification. On the other hand, certificate holders are reaching the limits of what FSC currently permits, and various temporary measures have had to be put in place to allow them to maintain their certification while longer-term solutions are explored.

Following the agreement of the latest temporary measures at their meeting in São Paulo, Brazil in March 2025, the FSC Board of Directors requested the development of a discussion paper:

The Board... acknowledged the need to enter into broader discussions with the membership about the overall role that FSC can play in the definition, management and protection of IFLs, including beyond the instrument of certification. The Board mandated the Secretariat to develop a discussion paper with a proposal for a new strategic approach towards IFLs, including consideration of motions submitted to the 2025 General Assembly, as input to membership dialogues leading up to the General Assembly. The outcome of membership dialogues is expected to inform the 2027-2032 Global Strategy.

The aim of this paper is to provide a common baseline of understanding on the subject of IFLs, and to provide proposals that can form the basis for a rounded discussion among FSC members.

4 Defining Intact Forest Landscapes and understanding their context

4.1 The origins of Intact Forest Landscapes

In 1997, the World Resources Institute published the report *The Last Frontier Forests: Ecosystems & Economies on the Edge* (Bryant *et al.*, 1997). This report drew on earlier mapping of wilderness areas (McCloskey and Spalding, 1989), forest cover maps and expert knowledge to identify “frontier forests”:

FRONTIER FORESTS are the world’s remaining large intact natural forest ecosystems. These forests are – on the whole – relatively undisturbed and big enough to maintain all of their biodiversity, including viable populations of the wide-ranging species associated with each forest type. As defined in this assessment, a frontier forest must meet seven criteria:

1. It is primarily forested.
2. It is big enough to support viable populations of all indigenous species associated with that forest type – measured by the forest’s ability to support wide-ranging animal species (such as elephants, harpy eagles, or brown bears).
3. It is large enough to keep these species’ populations viable even in the face of the natural disasters – such as hurricanes, fires, and pest or disease outbreaks – that might occur there in a century.
4. Its structure and composition are determined mainly by natural events, though limited human disturbance by traditional activities of the sort that have shaped forests for thousands of years – such as low-density shifting cultivation – is acceptable. As such, it remains relatively unmanaged by humans, and natural disturbances (such as fire) are permitted to shape much of the forest.
5. In forests where patches of trees of different ages would naturally occur, the landscape exhibits this kind of heterogeneity.
6. It is dominated by indigenous tree species.
7. It is home to most, if not all, of the other plant and animal species that typically live in this type of forest.

Yaroshenko *et al.* (2001) referred to both McCloskey and Spalding (1989) and Bryant *et al.* (1997) in the Greenpeace Russia and Global Forest Watch publication *The last intact forest landscapes of Northern European Russia: Mapping of intact forest landscapes in northern European Russia using high-resolution satellite images – methods and results*. The authors stated that:

In this study, large intact areas were defined as landscapes greater than or equal to 50,000 hectares, internally undivided by infrastructure, and with a minimum linear dimension no smaller than 10 kilometers. Such spaces are capable of maintaining most natural values and functions of a self-sustaining boreal landscape, including the following:

- Small-scale (the falling down or death of individual trees) and large-scale (fire, insect infestations, extreme weather conditions) random disturbances;
- Self-maintaining populations of plant and animal species especially sensitive to human disturbance;
- Intact catchment basins around rivers, bogs and streams;
- Spatial patterns of ecosystems and habitats;
- Rare or extremely sensitive ecosystems, that disappear in fragmented landscapes as a result of permanent human influence.

These dimensions sufficiently buffer most edge effects such as the collapse of the forest edge of logging sites, outbreaks of pest insects in logging debris, changes in water regime due to draining or waterlogging of neighboring clearcuts, and the effects of intensive hunting and fishing.

They noted “Uncertainty in the knowledge base guiding the choice of minimum viable area. The authors selected 50,000 ha relying heavily on expert opinion. This issue needs to be addressed further in future work.”

Yaroshenko *et al.* (2001) acknowledged that “The idea that... some of Earth’s forests or other natural ecosystems exist free of the impacts of human activities, is a significant simplification of reality”. They described at length the historical and modern human influences on the taiga, and identified “certain influences and disturbances” which “were considered background effects, of no significance to the identification of intact landscapes”. Summarising their approach to evaluating intactness, Yaroshenko *et al.* (2001) stated that an “area was considered to be in an intact natural state if showing no signs of permanent settlements or communications, of industrial forest harvesting during the last 60 years, or mining, land clearing, and other essential human impacts. Traces of low-intensity human disturbance were accepted in the intact areas as “background disturbance”. This includes hunting and early high-grading for timber far away from infrastructure.”

Following its initial application in the boreal forests of northern European Russia, the concept of Intact Forest Landscape was applied more widely to produce global maps (Potapov *et al.*, 2008, 2017). Potapov *et al.* (2008) stated that:

We define an IFL as an unbroken expanse of natural ecosystems within the zone of current forest extent, showing no signs of significant human activity, and large enough that all native biodiversity, including viable populations of wide-ranging species, could be maintained. Although all IFLs are within the forest zone, some may contain extensive naturally treeless areas, including grasslands, wetlands, lakes, alpine areas, and ice. This definition builds on the definition of frontier forest that was developed by the WRI (Bryant *et al.* 1997). The frontier forest definition captures several fundamental ecological characteristics of forest ecosystems: stability, biodiversity, and resistance to natural disturbances, but as it was based on broad types of intactness criteria, it was not suitable for rapid area assessment and mapping using remotely sensed data. We developed and used the IFL definition to achieve two important objectives: (1) to formalize a replicable procedure for analysis of disturbance and fragmentation in forest landscapes at a regionally and nationally relevant scale, and (2) to produce a globally consistent map of remaining intact areas that is suitable for underpinning the targeting of conservation work at these levels. As a consequence of the second objective, we used a discrete classification of landscapes (i.e., intact vs. non-intact) rather than degree of intactness (i.e., a continuous variable).

In setting size thresholds, Potapov *et al.* (2008) considered evidence regarding the minimum areas required to sustain viable populations of large forest mammals, on the basis that such areas would be “likely to be capable of maintaining most natural values and functions of the remaining self-sustaining forest landscape”, but “also considered the practical requirements of making a global assessment at a regionally relevant scale... Thus, the choice of size criteria represents a pragmatic compromise that makes the method ecologically meaningful yet also allows it to be executed in a timely fashion and repeated over time.”

Potapov *et al.* (2017) provided a condensed version of the definition of IFLs used in both studies as follows:

An IFL is defined as a seamless mosaic of forests and associated natural treeless ecosystems that exhibit no remotely detected signs of human activity or habitat fragmentation and is large enough to maintain all native biodiversity, including viable populations of wide-ranging species... An IFL

includes both forest and naturally treeless ecosystems. Two main criteria were used to distinguish an IFL patch from the surrounding landscape: (i) ecosystem alteration and (ii) landscape fragmentation by infrastructure and disturbance. Areas that have been altered or managed (through agriculture, logging, and mining) were excluded, along with a buffer zone of 1 km... on either side of infrastructure elements (roads, pipelines, power lines, and navigable rivers). Past disturbances that occurred more than 30 to 70 years ago, scattered small-scale shifting cultivation, nonindustrial timber harvesting by indigenous forest dwellers, and low-intensity disturbance not directly observable in remotely sensed data (hunting and forest grazing) were not considered IFL alteration or fragmentation factors. An IFL patch must have (i) a minimum size of 500 km², (ii) a minimum width of 10 km, and (iii) a minimum corridor/appendage width of 2 km. Any patch that falls below these thresholds, for example, due to fragmentation, logging, or fire, was rejected in its entirety.

Potapov *et al.* (2017) also clarified the relationship between IFLs and primary forest:

The term “intact forest landscape” is not congruent with the term “primary forest” as defined by the Food and Agriculture Organization of the United Nations (FAO)..., and the two must not be confused. Primary forests are part of IFLs, which also include nonforest intact ecosystems where climatic, soil, or hydrological conditions prevent tree growth, temporally treeless areas after the natural disturbance (for example, wildfires), and water bodies. IFLs may also include areas affected by low-intensity and historic human influence, such as hunting, scattered small-scale shifting cultivation, and preindustrial selective logging. IFLs include large fragments of primary forests with a minimum extent of 500 km², while smaller fragments of primary forests may be found outside IFLs.

4.2 The current definition and mapping of IFLs

Updates to the global Intact Forest Landscapes dataset have been carried out by the IFL Mapping Team¹, comprising Greenpeace, Global Forest Watch, the Wildlife Conservation Society, Transparent World, the Global Land Analysis and Discovery laboratory in the Department of Geographical Sciences at the University of Maryland, and WWF Russia. Data sets are now available for IFL extent in 2000, 2013, 2016 and 2020².

The definition used for this mapping, of which part has been adopted by FSC (see section 5.3), remains essentially the same as in Potapov *et al.* (2008) and Potapov *et al.* (2017), and is set out as follows³:

We define an **Intact Forest Landscape (IFL)** as an unbroken expanse of natural ecosystems within the zone of current forest extent, showing no signs of significant human activity and large enough that all native biodiversity, including viable populations of wide-ranging species, could be maintained. Although all IFL are within the forest zone, some may contain extensive naturally treeless areas, including grasslands, wetlands, lakes, alpine areas, and ice. This definition builds on the definition of Frontier Forest that was developed by WRI (Bryant *et al.*, 1997).

Technically, an **Intact Forest Landscape (IFL)** is defined as a territory within today's global extent of forest cover which contains forest and non-forest ecosystems minimally influenced by human economic activity, with an area of at least 500 km² (50,000 ha) and a minimal width of 10 km (measured as the diameter of a circle that is entirely inscribed within the boundaries of the territory).

¹ See <https://intactforests.org/team.html>, accessed 18 July 2025.

² See <https://intactforests.org/data.ifl.html>, accessed 18 July 2025.

³ See <https://intactforests.org/concept.html>, accessed 18 July 2025.

Areas with evidence of certain types of human influence are considered disturbed and consequently not eligible for inclusion in an IFL:

- Settlements (including a buffer zone of 1 km);
- Infrastructure used for transportation between settlements or for industrial development of natural resources, including roads (except unpaved trails), railways, navigable waterways (including seashore), pipelines, and power transmission lines (including in all cases a buffer zone of 1 km on either side);
- Agriculture and timber production;
- Industrial activities during the last 30-70 years, such as logging, mining, oil and gas exploration and extraction, peat extraction, etc.

Areas with evidence of low-intensity and old disturbances are treated as subject to "background" influence and are eligible for inclusion in an IFL. Sources of background influence include local shifting cultivation activities, diffuse grazing by domestic animals, low-intensity selective logging, and hunting.

Note that the "minimum corridor/appendage width of 2 km" specified by Potapov *et al.* (2017) remains, but is shown in a diagram.

It is important to note the assumptions and limitations inherent in such a definition. Savilaakso *et al.* (2023) reviewed "488 definitions linked with... 22 different terms used for natural and near-natural forests", and noted the contrast between the "Value and function-based definitions... more commonly used by Indigenous and local communities" and those preferred by researchers, government agencies and international organisations "based on attributes that can be measured either through remote sensing or in the field or where the threshold date is known". They cautioned that "Even technical definitions based on measurable characteristics, such as intactness, can have a large element of subjective judgment", and pointed to "a growing recognition of the need to shift the focus in conservation and ecology from global priority maps that are devoid of local considerations".

Potapov *et al.* (2008) acknowledged some of the limitations of the IFL approach:

The use of a single set of criteria allowed us to produce a globally consistent map and derive estimates of the level of intactness. However, these criteria are not sensitive to regional variations in the understanding of "intactness" and "disturbance," e.g., whether burned areas should be considered the effect of natural disturbance or not. Furthermore, they were designed specifically for use with remotely sensed data. The mapping method is not immune to underestimation of some types of human disturbances that are difficult to detect in satellite imagery, such as selective logging and small-scale slash-and-burn agriculture practices. Therefore, our results are generally not immediately suitable for local-scale conservation planning, as our globally consistent criteria may be in conflict with locally used criteria and locally known disturbances may have been overlooked. They may be used as a framework for such projects, however, to complement additional locally relevant information.

Potapov *et al.* (2017) also recognised that "Regional assessments may wish to deviate from the standard global method by using criteria that are adapted to the regional context, as GFWC [Global Forest Watch Canada] does".

Similarly, the International Union for Conservation of Nature have stated that, while the global IFL size threshold is "suitable for many purposes, other thresholds may be more suitable at regional and national levels that reflect local ecological factors" (IUCN, 2020).

4.3 The rationale for identifying and protecting IFLs

In their pioneering work on frontier forests, Bryant *et al.* (1997) eloquently set out why such forests matter; their arguments are more compelling than ever nearly thirty years later, especially in the context of the climate and biodiversity crises:

As large, intact ecosystems, frontier forests differ fundamentally from the fragmented or otherwise modified forests that dominate the landscape today. For one thing, frontier forests are large enough to provide a safe haven for all of their indigenous species...

Fragmented forests, on the other hand, are probably too small to support their full complement of species in the coming centuries. Smaller tracts are also vulnerable to processes beyond their borders... Many non-frontier forests also lack the natural features that native species rely on....

As large, intact ecosystems governed by nature, frontier forests provide baseline information on how such systems should work... The results help land managers find ways to lighten the human footprint in heavily used landscapes.

All forests help maintain the environmental conditions that make life possible, from regional hydrologic cycles to global climate. But huge frontiers are particularly important. Frontier forest ecosystems store tremendous amounts of carbon, for example...

Protecting and responsibly managing our last frontiers today will help countries avoid paying the high costs associated with massive forest loss and degradation...

Dwindling frontier forests are also home to many of the world's last indigenous cultures. About 50 million indigenous people live in tropical forests alone. Amazonian forests house at least 400 indigenous groups – 1 million people in all. Wiping out indigenous cultures by transforming forests is a moral crime...

Above and beyond practical considerations is the very real aesthetic and spiritual need just to know that remote and wild places remain on our crowded planet.

Similar rationales are presented in publications on Intact Forest Landscapes, justifying the need to identify them to inform land use decision making, and the need to monitor their conservation or loss.

Yaroshenko *et al.* (2001) gave three reasons for their focus on large areas:

First, only sufficiently large areas are capable of conserving populations of large animals in their natural, undisturbed state, and of letting natural ecological processes such as fire, wind throw, etc take their course. Second, large undisturbed areas are important as a reference that helps in the understanding of already disturbed areas (the vast majority of forest landscapes). Third, large intact areas are often comparatively cheap to conserve, as they tend to rely on remoteness and low productivity as their main sources of protection.

It is worth noting that their third point might not necessarily hold true outside the geographical scope of their study in northern European Russia; it was repeated by Potapov *et al.* (2008), but not by Potapov *et al.* (2017).

Potapov *et al.* (2008) mostly justified the protection of large natural forest landscapes by expanding on the rationale of Yaroshenko *et al.* (2001), but in particular they stressed links to the Convention on Biological Diversity (CBD) and the need to reduce carbon emissions from deforestation and forest degradation.

While Potapov *et al.* (2008) did refer to ecosystem services, they were more explicitly central to the arguments of Potapov *et al.* (2017):

Forest wildlands, those forests least affected by human activity, have the highest conservation value in terms of the range of ecosystem services they provide... These areas are often irreplaceable in harboring biological diversity, stabilizing terrestrial carbon storage, regulating hydrological regimes, and providing other ecosystem functions... Their ability to perform ecosystem functions and their resilience to natural disturbance and climate change are functions of their size... Large forest wildlands are the greatest terrestrial carbon stores, a function at risk from forest conversion (deforestation) and degradation... Small forest areas, even if pristine, have less potential for preserving wide-range species populations and have lower resilience to natural disturbance and effects of climate change... Hence, the size of the wildland matters: the larger the size, the higher the conservation value of the territory.

Potapov *et al.* (2017) made specific observations on the scale of carbon storage in IFLs, estimating that “average carbon density was greater in IFLs than in the rest of the tropical forest zone” but describing a more complex situation in boreal forests. They also drew a clear link between mapping and preserving IFLs: “Preservation of forest wildlands requires a robust mapping and monitoring system that can be implemented at national to global scales.”

The International Union for Conservation of Nature have issued a policy statement on primary forests including Intact Forest Landscapes (PF-IFL) (IUCN, 2020), which made it clear that “PF-IFL consistently provide benefits and functions that are unique, or of significantly higher quality, than those provided by degraded or plantation forests in the same ecological context across most ecosystem services... Hence, protecting and managing PF-IFL is a higher priority for delivering climate, biodiversity and development goals than action in non PF-IFL.” On this basis, the IUCN have argued that “The locations of PF-IFL should be identified urgently in all jurisdictions or ecological regions holding them, using datasets and stakeholder involvement relevant to specific national and regional contexts – to understand the threats they face, to define opportunities, including for connectivity and importance for biodiversity, ecosystem services, and carbon sequestration and storage, and to clarify the range of management options available to protect and improve their condition”.

Baldwin and Beazley (2019) have observed that “organisms that require large, undisturbed areas where natural patterns and processes can occur freely” are particularly threatened. Watson *et al.* (2018) pointed to “emerging evidence that the remaining intact forest supports an exceptional confluence of globally significant environmental values relative to degraded forests, including imperilled biodiversity, carbon sequestration and storage, water provision, indigenous culture and the maintenance of human health.” Grantham *et al.* (2021) also pointed to the global importance of IFLs for biodiversity conservation as “some of the last places on Earth that still contain species assemblages at near-natural levels of abundance, especially for wide-ranging species”. In addition, they highlighted the role of IFLs in “terrestrial carbon storage” and “regulating hydrological regimes by generating rainfall”, and noted that “Intact forests are also home to some of the most politically and economically marginalized indigenous communities, many of whom still have strong bio-cultural connections to their land”. IFLs have been described by Fa *et al.* (2020) “as critical strongholds for the protection of Indigenous and rural cultures and livelihoods”.

However, it is worth noting that areas identified as IFLs might not have all of these values. Plumptre *et al.* (2019) observed that the IFL approach implicitly includes “species integrity as a dimension of intactness”, but does not measure it directly; they found that “when we look at forest species that might be using the IFLs..., for many there are large parts of these “intact areas” where they are absent or at low densities... that are not likely ecologically functional”.

4.4 Trends in the extent of IFLs and their causes

When considering trends, it is important to note that reductions in IFL area are not necessarily equivalent to deforestation; for example, timber harvesting followed by regeneration or the construction of a new road might not result in deforestation but might mean that an area of forest no longer meets the definition of an IFL.

Potapov *et al.* (2017) described the loss of Intact Forest Landscapes between 2000 and 2013. They estimated the global extent of IFLs in 2000 to be “12.8 million km², or 22% of the forest zone area”:

In the humid tropics, IFLs are found in the Amazon and Congo River basins, the islands of Borneo and New Guinea, and the Southeast Asian highlands. Tropical regions comprise 48% of the total global IFL area. In dry tropical and subtropical regions, IFLs are scarce or absent due to extensive conversions to agriculture, some of which happened many centuries ago. Within the temperate and southern boreal forests of North America and Eurasia, IFLs remain only in small areas spared from commercial logging and agriculture. IFLs are abundant in northern boreal forests, interrupted mainly by mining, extraction of fossil fuels, and human-ignited wildfires associated with roads. Northern boreal IFLs comprise 36% of the total global IFL area.

They found that the global IFL area decreased by 919,000 km², or 7.2%, from 2000 to 2013:

Tropical regions are responsible for 60% of the total reduction of IFL area. In particular, tropical South America lost 322,000 km² of IFL area, whereas Africa lost 101,000 km². Temperate and southern boreal regions contributed 21% to the global IFL area loss. Northern Eurasia alone lost 112,000 km² of its IFL area. The remaining 19% of IFL area reduction occurred within the northern boreal forests of Eurasia and North America. Compared to the year 2000 IFL extent, the proportion of the IFL area reduction was lowest in the northern boreal regions and in the temperate forests of South America and highest in Australia, Southeast Asia, Africa, and the temperate regions of North America and Eurasia...

Potapov *et al.* (2017) found that the leading global causes of these reductions in IFL area were timber harvesting (37.0%), agricultural expansion (27.7%), wildfire spread from infrastructure and logging sites (21.2%), fragmentation by roads for mining and oil/gas extraction, pipelines and power lines (12.1%), and expansion of the transportation road network (2.0%). Another study found that oil, gas and mining concessions overlapped with nearly 20% of the tropical IFL area (Grantham *et al.*, 2021).

Given the way IFLs are defined, fragmentation by linear infrastructure can have as much or more impact on IFL area loss than deforestation. There are very real potential impacts of infrastructure on biodiversity. Potapov *et al.* (2017) stated that “Fragmentation of forest landscapes by logging and logging roads causes direct habitat loss... and increases the incidence of poaching..., resulting in species loss... Agricultural expansion, forest fires, and the potential increase of unregulated hunting... are coincident with the expansion of the logging road network.” Similar concerns were highlighted by Zwerts, Sterck *et al.* (2024). Grantham *et al.* (2021) noted that, while the footprint of extractive operations might be relatively small, “roads or pipelines can attract human populations to previously remote areas”, with possible threats to biodiversity including “over-exploitation (e.g., hunting, fishing), invasive species, and habitat loss”.

It is important to distinguish between direct and indirect causes of IFL loss. Describing global causes of biodiversity decline, Díaz and Malhi (2022) distinguished direct and indirect drivers as follows:

A distinction is made between direct drivers, which have direct physical impacts on nature, and indirect drivers, which operate diffusely by affecting the level, direction, rate, and/or intensity of direct drivers... Direct drivers can be natural (e.g., volcanic eruptions, earthquakes, weather events), human caused (e.g., deforestation, hunting, pollution, anthropogenic climate change), or

a mixture of both (such as El Niño–Southern Oscillation phenomena or zoonotic diseases amplified by anthropogenic climate change). All indirect drivers are human caused, social, economic, demographic, cultural, institutional, and political in nature and ultimately underpinned by social values and narratives. They include patterns of supply and production of goods and services; patterns of consumption and technology adoption; dietary preferences; demographic dynamics; lifestyle choices and fashion trends; and institutions in the broad sense of socially shared rules, from local customary inheritance rules to international agreements such as the CBD and the World Trade Organization. The distinction between direct and indirect drivers is crucial conceptually and practically, because although direct drivers can be ameliorated or even temporarily stopped, these efforts are unlikely to succeed in the long term unless the indirect drivers, the root causes of the present decline in biodiversity, are tackled.

Kashmanian (2020) discussed the links between threats to biodiversity and global megatrends in terms of “Population”, “Urbanization” and the “Middle class”.

In addition to identifying direct threats to frontier forests, Bryant *et al.* (1997) also acknowledged that “Behind the obvious activities endangering the world’s frontier forests are a nest of interrelated root causes”. They described these root causes under the headings “Growing economies and consumption”, “Population growth and demand for new land”, “Bad economic policies”, “Short-sighted political decisions”, “Corruption and illegal trade”, and “Poverty and landlessness”.

Kan *et al.* (2023) investigated links between IFL loss and global markets, noting that “regional land use change is no longer simply driven by local demand, but is rather indirectly influenced by international markets and the surging consumption of land-based products. Countries with forest conservation goals can import finished land-based products via global supply chains, displacing land use pressure and related eco-environmental impacts outside their own territory borders.” They found that “IFL loss associated with distant final consumption comprised 37% of global total anthropogenic IFL loss. Generally, displaced IFL loss was linked to the exports from IFL-rich regions (e.g., Russia, Canada, Southeast Asia, Oceania, Central Africa, and Latin America) to developed (i.e., the EU and the United States) and emerging (i.e., mainland China) economies.”

Top-down IFL governance and land tenure insecurity have also been identified as indirect causes of IFL loss, as they limit the ability of Indigenous Peoples and local communities to protect their forests (Fa *et al.*, 2020).

More specific analyses of direct and indirect threats to forests have been carried out at regional levels. For example, *The Forests of the Congo Basin: A Preliminary Assessment* (CARPE, 2005) lists both direct and indirect threats, while *Deforestation Trends in the Congo Basin: Reconciling Economic Growth and Forest Protection* (Megevand, 2013) includes an exploration of proximate and underlying causes of deforestation and forest degradation.

4.5 Strategies for protecting IFLs

Having made their case for the value of Intact Forest Landscapes, Potapov *et al.* (2017) warned that intactness “can be reduced very rapidly, in a matter of months and years, by increased fragmentation and access, even without changes in tree canopy cover. On the other hand, intactness is hard to gain, at least within a short time span. That is why intact landscapes should be treated as having high (or even the highest) conservation value...”.

Similarly, Potapov *et al.* (2008) had stated that “The only way to maintain the full range of values of an “intact” forest landscape is to maintain its intactness (engineered intactness is impossible by definition)”. They had argued for the strict protection of large natural areas (IUCN categories I–III), “particularly in places where the level of threat is high”. However, they acknowledged that

...total protection of IFLs may be difficult in some cases for socioeconomic reasons. The most accessible and productive areas for food and timber production may already have been exhausted or degraded, and population growth and lack of other opportunities also increase pressure on remaining marginal areas. In such situations, an appropriate strategy may be to divide IFLs into zones. This would entail creating zones of strict nature protection (where the goal would be to preserve intactness values) and of low-impact management (in which limited forestry operations or small-scale farming with strict observance of ecological norms could take place).

The IUCN (2020) have stated unambiguously that “There is clear evidence that PF-IFL are difficult, if not impossible, to replace in human time scales and irreplaceable in the time scales needed to tackle the climate and biodiversity crises as well as development challenges”, and has encouraged all stakeholder to “act to enhance the conservation and restoration of PF-IFL wherever possible”:

Actions relating to forests by all stakeholders should prioritise the maintenance and enhancement of PF-IFL by ensuring that deforestation and degradation (including fragmentation) are avoided in these areas, and that restoration is promoted where required. Management options include:

- Utilising spatial planning and zoning to: (i) regulate land use activities; (ii) enhance, buffer and reconnect areas of PF-IFL and; (iii) incorporate PF-IFL protection into ecosystem-based disaster risk management, including by overlaying customary land areas with disaster planning.
- Implement strict and effective protection of PF-IFL within existing protected areas in all regions. Effective protection including the allocation of necessary human and financial resources and banning commercial logging, which leads to the degradation of PF-IFL.
- Expanding PF-IFL Protected Areas networks and ecological corridors by looking at the full range of co-management tools including, Indigenous and Community Conserved Areas (ICCAs), Other Effective Area-Based Conservation Measures (OECMs), and indigenous territories.
- Encouraging land conservancies to protect and restore PF-IFLs on private land.
- Increasing enforcement capacity for protection (e.g., through increased funding for surveillance and equipment).
- Improving the planning, design, and regulation of roads to: (i) avoid further fragmentation of PF-IFL and Protected Areas, and (ii) differentiate between roads needed for community development and industrial development.
- Encouraging restoration of degraded natural forests, including, where feasible and appropriate, of commodity production forests to improve carbon sequestration and storage and the outlook for biodiversity, ecosystem integrity, stability and resilience.
- Encouraging policy and legislative reforms that will ensure the protection of PF-IFL in Protected Areas and private concessions.

In their policy statement, the “IUCN make clear that: (1) the loss of PF-IFL cannot be compensated for through reforestation or afforestation; (2) industrial extractive activities in PF-IFL are inappropriate...” (IUCN, 2020). Even more explicitly, they state that “Large-scale production of timber and other commodities reduces the carbon stock, biodiversity value, and stability and resilience of PF-IFL, even in well-managed forests. Forest conservation initiatives based on introducing sustainable forest management into PF-IFL as a well-intentioned strategy aimed at preventing deforestation, nevertheless cause significant damage and increase the vulnerability of forests to [further] loss and degradation.” Conversely, they recognise that “Cultural values and biodiversity conservation are intimately linked in areas managed by IP&LC [Indigenous Peoples and local communities]. Relationships between IP&LC and with their homelands, including plants and wildlife, have co-shaped many forest ecosystems. Sophisticated governance systems help protect key plants and wildlife and areas of important spiritual value.”

Regarding Indigenous stewardship of IFLs, Fa *et al.* (2020) found that “IFLs within Indigenous Peoples’ lands covered at least 4.2 million km² or 36.2% of the world’s IFL area... In 36 of the 50 sampled countries, the ratio of IFL area to total forest zone area was higher on Indigenous Peoples’ land than on other lands... The global extent of IFLs has declined by 9.4% (1.2 million km²) since 2000. The total reduction across all countries was 8.2% on Indigenous Peoples’ lands... and 10% in other lands...”

As for protected areas, Potapov *et al.* (2017) found that, “Of the total IFL area in the year 2000, 12.4% fell within protected areas (PAs), with a management regime consistent with the International Union for Conservation of Nature (IUCN) categories I to III... Australia and temperate South America have the largest proportion of IFLs under legal protection (47.4 and 43.7%, respectively), whereas temperate and southern boreal northern Eurasia (7.7%) and northern boreal regions (7.7% in North America and 5.2% in Eurasia) have the lowest.” They observed that, “In all regions, the proportion of the reduction of IFL area was lower inside of PAs than outside of PAs..., suggesting that legal protection was effective in preventing IFL loss”. However, they also noted that even protected IFL areas are not immune from the effects of agricultural expansion and infrastructure development.

More localised evaluations of the effectiveness of protected areas and management by Indigenous Peoples are available, for example for Brazil (Lentini *et al.*, 2020):

In 2000, around 65% of the IFLs in the Brazilian Amazon were located in protected areas and indigenous territories (161 million ha), around 5% in community lands (settlements and areas of traditional and maroon populations), and 30% in unsettled lands and private lands... There is a large difference in the rate of loss of IFLs in different land tenure categories in the period 2000-2016. While the average rate of loss for protected areas and indigenous territories was around 3.4% during these 16 years, in community lands it was equivalent to 20% (achieving almost 25% in rural agricultural settlements), and 32% in private lands.

Of course, recognising the most effective measures for avoiding IFL loss is only part of the challenge. Attempts to balance the various competing demands on land in meaningful strategies, especially taking into account the priorities of those who live and work on the land, “are often “wicked” problems with no clear definitive formulation or final solution” (Sayer *et al.*, 2013). Bull *et al.* (2019) have suggested that “The centre of gravity of forest governance needs to move further from the simplistic global discourse driven almost exclusively by concerns for climate change and biodiversity towards a more complex and nuanced approach that responds to the realities of all forest users and their demands on the forest”.

The specific role that FSC currently does and potentially can play is discussed in the sections that follow.

5 IFLs in the FSC system

5.1 FSC before IFLs

The FSC Principles and Criteria for Forest Stewardship, more commonly referred to simply as the Principles and Criteria, are the foundation of the FSC certification system, as they provide the fixed basis for Forest Stewardship Standards throughout the world. It is instructive to follow the development of certain elements of the Principles and Criteria even before Intact Forest Landscapes were explicitly introduced.

The earliest version of the Principles and Criteria, from 1994, was titled *Principles and Criteria for Natural Forest Management*⁴. It included Principle 9 on the “Maintenance of natural forests”, which required that “Primary forests, well-developed secondary forests and sites of major environmental, social or cultural significance shall be conserved. Such areas shall not be replaced by tree plantations or other land uses.” This Principle did not prohibit harvesting in these forests but aimed to preserve their character, as the two associated Criteria focussed on tree planting to ensure that “Such plantings shall not replace or significantly alter the natural ecosystem” (Criterion 9.1). “Primary forest” was defined as:

An ecosystem characterized by an abundance of mature trees, relatively undisturbed by human activity. Human impacts in such forest areas have normally been limited to low levels of artisanal hunting, fishing and harvesting of forest products, and, in some cases, to low density, shifting agriculture with prolonged fallow periods. Such ecosystems are also referred to as “mature,” “old-growth” or “virgin” forests.

Note that Potapov *et al.* (2017) clarified the relationship between primary forest and IFLs (see section 4.1).

The 1996 version adopted the title *Principles and Criteria for Forest Stewardship* and formally incorporated Principle 10 on plantations.

The 1999 version of the Principles and Criteria incorporated significant changes to Principle 9, as well as introducing Criteria 6.10 and 10.9 on conversion. Principle 9 now addressed “Maintenance of High Conservation Value Forests”, in the following terms:

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

The introduction of the concept of High Conservation Value Forest (HCVF) was an innovation of which FSC is justly proud, and has since formed the basis for the more general concept of High Conservation Values (HCVs)⁵. Criteria under Principle 9 required assessment to determine the presence of HCVF (Criterion 9.1), consultation on options for the maintenance of HCVF (9.2), the planning and implementation of “specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach” (9.3), and annual monitoring of the effectiveness of measures (9.4).

⁴ Early versions of the Principles and Criteria were retrospectively assigned version numbers, but at the time they were issued they were distinguished by date. Formal version numbering only began with version 4-0 in 2002.

⁵ See <https://www.hcvnetwork.org/>, accessed 18 July 2025.

The definition of “High Conservation Value Forests” included “large landscape level forests”; the relevant text is underlined:

High Conservation Value Forests are those that possess one or more of the following attributes:

a) forest areas containing globally, regionally or nationally significant:

- concentrations of biodiversity values (e.g. endemism, endangered species, refugia); and/or

- large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance

b) forest areas that are in or contain rare, threatened or endangered ecosystems

c) forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control)

d) forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health) and/or critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).

Parallels may be observed with the definition of “frontier forest” used by Bryant *et al.* (1997), especially their criteria 2 and 7.

A definition of the “Precautionary approach” was added to the Principles and Criteria in 2000.

When version 5-0 of the Principles and Criteria⁶ was approved in 2012, the definition of “High Conservation Value (HCV)” was broadened beyond forest areas and divided into six categories, and the previous reference to “large landscape level forests” was changed to “Landscape-level ecosystems and mosaics” under HCV 2:

HCV 2 - Landscape-level ecosystems and mosaics. Large landscape-level *ecosystems*^{*7} and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.

Principle 9 now required that “*The Organization** shall maintain and/or enhance the *High Conservation Values** in the *Management Unit** through applying the *precautionary approach**”. The four Criteria under this Principle covered the assessment of HCVs (Criterion 9.1), the development of “effective strategies that maintain and/or enhance the identified *High Conservation Values**” (9.2), the implementation of strategies following a precautionary approach (9.3), and periodic monitoring and adaptive management (9.4). Compared to the previous version of these Criteria, there was now a greater emphasis on engagement with affected stakeholders, interested stakeholders and experts.

In summary, from the earliest days of the FSC system the Principles and Criteria included a requirement to conserve primary forest. In 1999, largely aligned with the frontier forests definition of Bryant *et al.* (1997) and before the term Intact Forest Landscapes was used by Yaroshenko *et al.* (2001), this was replaced with a requirement to maintain or enhance the attributes which defined globally, regionally or nationally significant large landscape level forests where viable populations of most if not all naturally occurring species existed in natural patterns of distribution and abundance, taking a precautionary approach. Later this was broadened to address the maintenance or enhancement of

⁶ FSC-STD-01-001 V5-0 EN *FSC Principles and Criteria for Forest Stewardship*.

⁷ Terms in italics and followed by an asterisk are defined in the FSC document in which they appear.

large landscape-level ecosystems and ecosystem mosaics on a similar basis. What was not explicitly addressed at this stage was the characteristic of “intactness”, although it was arguably implicit in defining such areas in terms of natural patterns of distribution and abundance of naturally occurring species.

In this context, it is useful to consider the notes on the rationale for the revised Criterion 9.1 which accompanied the final draft of version 5-0 of the Principles and Criteria but which were not included in the published document. These included the following statement:

The main effect of HCV 2 is to give special protection to large, relatively intact natural forests, although this protection is already provided by other Criteria, including those that protect biological diversity and landscape values and prevent conversion.

Thus, the intent of HCV 2, in the context of Principle 9 and in concert with other Criteria, was unambiguously stated as being “to give special protection to large, relatively intact natural forests”.

5.2 Motion 65

Intact Forest Landscapes were introduced into the FSC system when Motion 65/2014 “High Conservation Value 2 (HCV2) – Intact forest landscapes (IFL) protection” was passed by the FSC membership at the General Assembly in Seville, Spain in 2014 (for the full text of the motion, see Annex A).

The core of the motion was a requirement to develop, modify or strengthen indicators in Forest Stewardship Standards “that aim to protect the vast majorities of IFLs”. Under the overarching considerations of “scale, intensity and risk” and respect for “the activities, customary and legal rights of traditional forest communities”, the motion listed a number of specific considerations for this process, including ensuring “that Certificate Holders implement protection measures... ensuring management for intactness” in IFL “cores” but also allowing for “limited development of IFL cores” in “limited circumstances”. Crucially for the implementation of the motion, it included the following provision (with italics in the original):

If by the end of 2016 a relevant standard has not been implemented, a default indicator will apply that mandates the full protection of a core area of each IFL within the management unit. *For this purpose, the core area of the IFL will be defined as an area of forest comprising at least 80% of the intact forest landscape falling within the FMU* [Forest Management Unit]

As a key part of the implementation of Motion 65, an explicit reference to IFLs was added to the definition of HCV 2 in version 5-1 of the Principles and Criteria⁸:

HCV 2 - Landscape-level ecosystems and mosaics. Intact forest landscapes and large landscape-level ecosystems* and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.

This formal incorporation of IFLs was achieved through the passing of Statutory Motion 7/2014 “Changes to the Principles and Criteria (P&C)”, which included a note stating that “FSC will define intact forest landscapes (IFLs) in the FSC Glossary” and quoting part of the Global Forest Watch definition.

⁸ FSC-STD-01-001 V5-1 EN FSC Principles and Criteria for Forest Stewardship.

5.3 Developments 2014-2024

Much of the information in this section is based on motion implementation reports available via the FSC Members' Portal⁹.

As per Statutory Motion 7/2014, a formal definition of "Intact Forest Landscape" was added to the FSC Glossary of Terms¹⁰, and was also included in the first version of the International Generic Indicators (IGIs)¹¹, approved in 2015:

a territory within today's global extent of forest cover which contains forest and non-forest ecosystems minimally influenced by human economic activity, with an area of at least 500 km² (50,000 ha) and a minimal width of 10 km (measured as the diameter of a circle that is entirely inscribed within the boundaries of the territory) (Source: Intact Forests / Global Forest Watch. Glossary definition as provided on Intact Forest website. 2006-2014).

Note that this selection from the full definition on the Intact Forest Landscapes website (see section 4.2), which followed the note in Motion 7/2014 exactly, focussed on the quantitative aspects, and omitted the qualitative aspects regarding human influence and "background" influence. The definition was only used in the IGIs in the context of Criterion 9.1 and the definition of "High Conservation Value (HCV)"; at this stage, there were no explicit references to IFLs in generic indicators or in instructions for standard developers.

The HCV Technical Working Group was tasked with developing a set of International Generic Indicators to address the elements of Motion 65. An IFL Solutions Forum was also established to discuss the challenges of IFL protection.

An "Advice Note for the interpretation of the default clause of Motion 65"¹² came into effect on 1 January 2017. The advice note was to "expire in each country once the National Forest Stewardship Standard or Interim National Standard becomes effective", and its stated intent was "to advise certificate holders and certification bodies to minimize further destruction of IFLs before the full set of NFSS or INS indicators for Motion 65 become effective". The note contained the following advice to certificate holders and certification bodies in IFL countries:

1. Forest Management operations, including harvesting and road building may proceed in IFLs, if they:
 - 1.1. Do not impact more than 20% of Intact Forest Landscapes within the Management Unit (MU), and
 - 1.2. Do not reduce any IFLs below the 50,000 ha threshold in the landscape.

NOTE: PSU is developing further instructions on road building in IFLs.

⁹ *Update on Motions that passed at the FSC GA 2008, 2011 and 2014*, updated 30 September 2021, *Update on Motions implementation approved at the 2017 General Assembly*, dated 30 September 2021, and *Update on Motions implementation approved at the 2021-2022 General Assembly*, dated 28 October 2024, available to FSC members via <https://members.fsc.org/en/Members>.

¹⁰ FSC-STD-01-002 *FSC Glossary of Terms* last updated 19 October 2017 (available at <https://connect.fsc.org/document-centre/documents/resource/207>).

¹¹ FSC-STD-60-004 V1-0 EN *International Generic Indicators*. The IGIs provide the common starting point for the development of Forest Stewardship Standards indicators, and include instructions for standard developers, most of which are mandatory.

¹² ADVICE-20-007-018 V1-0 in FSC-DIR-20-007 EN *FSC Directive on FSC Forest Management Evaluations*.

1.3. Global Forest Watch IFL maps www.globalforestwatch.org, or a more recent IFL inventory using the same methodology, such as Global Forest Watch Canada, shall be used in all regions as a baseline.

1.4. Non-conformity with the above clauses 1.1. – 1.3. shall result in Corrective Action Requests.

Motion 34/2017 “Regional assessments of the impacts of the implementation of Motion 65/2014” was passed by the FSC membership at the General Assembly in Vancouver, Canada in 2017:

Enable the conducting of regional assessments of the short and long-term impacts – positive and negative – of the management and protection measures associated with the implementation of Motion 65/2014 and the International Generic Indicators (IGI) which are the starting point for developing National Standards. In accordance with item 5 of the Motion, these assessments should compare various scenarios of implementing Motion 65/2014 and the IGIs and consider the environmental, social, and economic dimensions. Particular effort will be made to ensure the inclusion of impacts on indigenous Peoples, traditional peoples and forest dependent communities in these assessments.

Guidelines developed to implement this motion identified four priority countries/regions for assessment (two tropical, Brazil and the Congo Basin, and two boreal, Canada and Russia) and set out the procedure to be followed by independent consultants.

The IFL indicators developed by the HCV Technical Working Group were incorporated into a revised version of the IGIs¹³ which became effective in July 2018. While references to IFLs were inserted under a number of Criteria, most were naturally concentrated under Principle 9. Standard developers were instructed to develop indicators for the assessment of IFLs under Criterion 9.1 and indicators that protected 80% of the total area of IFLs within the management unit as core areas under Criterion 9.2. An annex provided more detailed instructions on developing these indicators, as well as a process to develop a threshold for core areas other than 80%. “Core area” was defined as:

The portion of each *Intact Forest Landscape** designated to contain the most important cultural and ecological values. *Core areas** are managed to exclude *industrial activity**. *Core Areas** meet or exceed the definition of *Intact Forest Landscape**.

New generic indicators included the following:

9.2.5 The *vast majority** of each *Intact Forest Landscape** is designated as *core area**.

9.2.7 Management strategies allow limited *industrial activity** within *core areas** only if all effects of *industrial activity** including *fragmentation**:

- 1) Are restricted to a *very limited portion of the core area**;
- 2) Do not reduce the *core area** below 50,000 ha, and
- 3) Will produce clear, substantial, additional, long-term conservation and social benefits.

The definition of “Very limited portion of core area” stated that:

The area affected *shall** not exceed 0.5% of the area of the *core area** in any one year, nor affect a total of more than 5% of the area of the *core area**.

The 2018 update to the IGIs also incorporated the concept of “Indigenous cultural landscapes”, defined as follows:

¹³ FSC-STD-60-004 V2-0 EN *International Generic Indicators*.

Indigenous cultural landscapes are living landscapes to which Indigenous Peoples attribute environmental, social, cultural and economic value because of their enduring relationship with the land, water, fauna, flora and spirits and their present and future importance to their cultural identity. An Indigenous cultural landscape is characterized by features that have been maintained through long-term interactions based on land-care knowledge, and adaptive livelihood practices. They are landscapes over which Indigenous Peoples exercise responsibility for stewardship.

NOTE: The adoption of the term Indigenous cultural landscapes is voluntary by Standard Development Groups. Standard Development Groups may choose not to use it. Through Free Prior and Informed Consent Indigenous Peoples may choose to use different terminology

IFLs and Indigenous cultural landscapes came together under Criterion 3.1 in a generic indicator which required that “The aspirations and goals of *Indigenous Peoples** related to management activities, *Intact Forest Landscapes** and *Indigenous cultural landscapes**” be documented and/or mapped through culturally appropriate engagement. This coincided with the introduction of expanded requirements regarding Free, Prior and Informed Consent (FPIC) and the new defined term of “Affected Rights Holder”:

Persons and groups, including *Indigenous Peoples**, *traditional peoples** and *local communities** with legal or *customary rights** whose *free, prior and informed consent** is required to determine management decisions.

The link between the Indigenous Peoples’ rights covered by Principle 3 and IFLs and other HCVs covered by Principle 9 was reinforced by including affected rights holders among the parties to be involved, through culturally appropriate engagement, in the development of National HCV Frameworks, the assessment of HCVs (IGI 9.1.3), the development of strategies to maintain and/or enhance them (IGI 9.2.3), and monitoring (IGI 9.4.2). While Indigenous Peoples were already included among the affected stakeholders to be engaged, the explicit new references to affected rights holders established a link between HCV requirements, Indigenous Peoples’ rights and FPIC requirements. Furthermore, instructions for standard developers regarding the development of indicators for the identification and designation of core areas state that they must respect the right to Free, Prior and Informed Consent of affected rights holders (Annex H of the IGIs).

2020 saw the publication of several guidance documents on HCVs, including two specifically addressing IFLs. *Intact Forest Landscapes Guidance for Forest Managers*¹⁴ was published in January 2020 and described how managers should “Identify and assess IFLs”, “Engage with Indigenous Peoples, local communities and other stakeholders”, “Develop and implement strategies for protecting core areas”, “Ensure consistency with the requirements the International Generic Indicators”, and “Monitor the impacts of forest operations in IFLs and core areas”. In June 2020, FSC published *Guidance for Standard Developers to Develop a National Threshold for the Core Area of Intact Forest Landscapes (IFL) within the Management Unit*¹⁵. This provided additional guidance in situations where standard developers wished to deviate from the default threshold of 80% of the IFLs to be protected within the management unit as per IGI 9.2.5, and contained the following significant clause:

The agreed threshold(s) should not be lower than the default minimum threshold as provided in Clause v.

¹⁴ FSC-GUI-30-010 V1-0 EN *Intact Forest Landscapes Guidance for Forest Managers* (available at <https://connect.fsc.org/document-centre/documents/resource/424>).

¹⁵ FSC-GUI-60-004 V1-0 EN *Guidance for Standard Developers to Develop a National Threshold for the Core Area of Intact Forest Landscapes (IFL) within the Management Unit* (available at <https://connect.fsc.org/document-centre/documents/resource/443>).

v. Protecting the ‘vast majority’ of IFLs implies that the IFL area protected within the MU shall exceed 50%. In addition, forestry operations shall not lead to the reduction of any occurrence of IFL below 50,000 ha in the landscape. For that purpose, a monitoring system has to be in place to alert changes in IFL areas in the wider landscape.

An exception to this minimum threshold of 50% was possible only “when all IFLs in the country are formally and effectively protected”.

The four reports commissioned in accordance with Motion 34 were completed in 2020 and 2021, and a summary report by the Motion 34 Steering Committee was published in 2022¹⁶. The report for Brazil covered the Brazilian Amazon, the report for Canada covered Ontario, Québec and British Columbia, and the report for the Congo Basin covered Cameroon, the Democratic Republic of the Congo, the Republic of the Congo and Gabon. These reports were particularly revealing in terms of the proportions of IFLs which were formally protected (60% in Brazil, 45-65% in Canada, 25% in the Congo Basin, and none in Russia) and the proportions of the total IFL areas which fell within certified management units (0.6% in Brazil, 7% in Canada, 1.4% in the Congo Basin, and 2.3% in Russia). In addition to the very small proportions of IFLs subject to FSC certification, the reports flagged issues with potential contract breaches for concessionaires, the risk of losing certificates due to uncompensated revenue loss, reductions in local employment and less investment in services for workers and communities.

Motion 23/2020¹⁷ “Use landscape-wide approaches adapted to local conditions and strengthen Standard Development Groups (SDGs) to improve protection of Intact Forest Landscapes” was passed by the FSC membership at the General Assembly in Bali, Indonesia in 2022 (for the full text of the motion, see Annex B). While there was a great deal of detail in this motion, it essentially asked FSC to focus efforts on effective landscape-level conservation of IFLs and to relieve certificate holders from some of the restrictions on management which were seen as counterproductive. The motion called for an interim rule to be put in place “until a comprehensive global approach has been developed and agreed”, stipulating that “This interim rule shall enable approval of proposals duly adopted by national/regional SDGs temporarily requiring thresholds for strict IFL conservation within the FMU of less than the majority of the IFL”. The rationale for the motion highlighted the lack of alignment between FSC’s approach to IFLs and the lessons learned since 2014, including the findings of the Motion 34 reports. It also suggested a failure of alignment with FSC Statutes.

Also notable is a motion which did not pass at the Bali General Assembly: Motion 46/2021 “Incentives and benefits for the conservation of Intact Forest Landscapes and Indigenous Cultural Landscapes”. “To support the implementation of Motion 65 (2014) and Principle 9”, this motion would have called on FSC to “collaborate globally with members and key stakeholders to develop an approach that provides incentives and benefits for the protection of HCV2 including Intact Forest Landscapes (IFL), and Indigenous Cultural Landscapes (ICL), associated with FSC certified management units and the adjacent landscapes”. This motion received the support of the environmental and social chamber but did not receive sufficient support from the economic chamber. Reasons suggested for the lack of support include the fact that the approach was to “be primarily aimed at supporting Indigenous Peoples and Local Communities (IPLC)s to protect their forest and support their rights and livelihoods” and the expectation “that FSC supply chain partners and brands selling FSC products would contribute to the fund”.

¹⁶ All of these reports are available via <https://connect.fsc.org/stakeholder-engagement/focus-forests>, accessed 30 July 2025.

¹⁷ Also referred to as Motion 23/2022.

In January 2023, a revised version of the advice note on “Protection of Intact Forest Landscapes (IFLs)”¹⁸ came into effect. This implemented the interim rule required by Motion 23/2020 as follows:

1. Forest Management operations, including harvesting and road building, shall not impact more than 20% of IFLs within the management unit and shall not reduce any IFLs below the 50,000 ha threshold in the landscape.
2. Until 31 December 2024, Forest Management operations, including harvesting and road building, may proceed on a needs basis beyond the 20% threshold, if The Organization:
 - 2.1 Operates in a country in Latin America (including the Amazon) or in Central Africa and has held FM or FM/CoC certification at least since 14 October 2022,
 - 2.2 Has exhausted all feasible options to harvest in non-IFL areas,
 - 2.3 Does not impact more than 50% of IFLs within the management unit,
 - 2.4 Does not reduce any IFLs below the 50,000 ha threshold in the landscape,
 - 2.5 Follows the regular harvesting planning or approved management plans,
 - 2.6 Implements minimal impact logging techniques considering Annex 1 of FSC-GUI-30-010 or Reduced-Impact Logging for Climate Change Mitigation (RIL-C) delivering measurable climate change mitigation outcomes,
 - 2.7 Applies the minimal impact logging techniques especially in road construction and minimizing fragmentation, e.g., by prioritizing the edges of IFLs rather than the centres,
 - 2.8 Has presented and analysed the status and plans for HCV-2 management in the management unit.
3. The Organization shall use Global Forest Watch IFL maps or an alternative IFL inventory using the same methodology, such as Global Forest Watch Canada, with 01 January 2017 as a baseline.

Also as part of the implementation of Motion 23, in early 2024 a draft procedure and guidance on landscape approaches to IFL protection were produced¹⁹. These draft documents formed the basis for registering pilot tests in Brazil, Canada, Peru and the Republic of the Congo. The pilot processes are expected to end in early 2026, although the associated new IFL indicators in the respective Forest Stewardship Standards are not expected to come into effect until August 2026 in some cases. FSC’s Focus Forests Advisory Group has been appointed as the working group for this ongoing revision of requirements for IFL conservation²⁰.

In July 2024, another revised version of the advice note on “Protection of Intact Forest Landscapes (IFLs)”²¹ came into effect, extending “the deadline of the interim rule while a revised approach becomes available in key countries”. The deadline in clause 2 changed from 31 December 2024 to 30 June 2026.

¹⁸ ADVICE-20-007-018 V2-0 in FSC-DIR-20-007 EN *FSC Directive on FSC Forest Management Evaluations*.

¹⁹ FSC-PRO-60-004 V1-0 EN D1-1 *Development of indicators for the protection of Intact Forest Landscapes considering the landscape level* and FSC-GUI-60-004a V1-0 EN D1-0 *Landscape approach to Intact Forest Landscapes* (both available at <https://connect.fsc.org/current-processes/revision-requirements-intact-forest-landscapes-ifl-conservation>).

²⁰ See <https://connect.fsc.org/current-processes/revision-requirements-intact-forest-landscapes-ifl-conservation>, accessed 30 July 2025.

²¹ ADVICE-20-007-018 V3-0 in FSC-DIR-20-007 EN *FSC Directive on FSC Forest Management Evaluations* (available at <https://connect.fsc.org/document-centre/documents/resource/394>).

5.4 Developments in 2025

Motion 23 pilot tests are still in progress. A landscape dialogue was held in the Republic of the Congo in January 2025, and in June a partial revision of the country's Forest Stewardship Standard was submitted to the FSC Country Requirements team for assessment.

Although the implementation of Motion 23 is ongoing, a number of motions directly or indirectly linked to IFLs have been proposed for the 2025 General Assembly, including the following:

- Motion 43/2025 “Strengthening Identification, Protection and Monitoring of Forest HCVs (1-6)” calls for greater consistency in HCV requirements in Forest Stewardship Standards, more transparency on HCVs in certificate holder and certification body reporting, and improved aggregation of data.
- At the time of writing, Motion 44/2025, originally titled “Revision of FSC’s approach to Intact Forest Landscapes (IFLs) to integrate a dynamic and contextual perspective”, has been withdrawn and merged with Motion 48/2025, now titled “A Strategic Framework for Landscape-Level Engagement and Impact”. The proposed framework will be voluntary and “Provide a strategic vision for FSC’s role at the landscape level, recognizing that forest resilience, biodiversity conservation, climate action, and the protection of HCVs (including IFLs) require coordinated approaches beyond FMUs”. The motion recognises the need for additional costs to be covered by external financing.
- At the time of writing, Motion 45/2025, originally titled “Impactful Intact Forest Landscape (IFL) Conservation”, has been renamed “Moving beyond fixed thresholds to outcome-based conservation for Intact Forest Landscapes (IFLs)”. Current text states that, “As ecological, environmental, social and economic conditions vary widely among Intact Forest Landscapes (IFLs); and to remain a credible and effective force for their conservation, FSC shall adapt its approach—replacing fixed IFL protection thresholds with environmentally, socially and economically equitable, viable, context-sensitive and dynamic forest management practices that conserve ecosystem integrity and socio-cultural values within Forest Management Units (FMUs)”. The rationale for the motion suggests that “Ten years of IFL discussions within the FSC have failed to yield tangible biodiversity protection or inclusion of socio-cultural values in these critical landscapes. Instead, they have resulted in barriers to certification in both tropical and boreal forests. FSC’s current approach, centred around thresholds for strict protection, has proven largely unworkable economically and socially.” Specific proposals are made under the headings “Management”, “Monitoring” and “Outcome based adaptive management”, with the first proposal being that “Forest management activities designed to maintain and/or restore the ecological integrity and socio-cultural values of IFLs replace fixed IFL protection thresholds with immediate effect”.

Of course, it remains to be seen whether these motions will receive the necessary cross-chamber support.

Meanwhile, challenges in implementing FSC’s existing requirements for IFL management remain. At their meeting in São Paulo, Brazil in March 2025, the FSC Board of Directors were presented with information on two key issues. Firstly, concerns continue to be expressed by companies and FSC network partners that some certificate holders will reach the current threshold for the protection of IFL core areas before the Motion 23 pilots are concluded. One underlying reason for this is that most concessionaires are bound by government issued licences and associated management plans which hold them to agreed harvesting levels.

Secondly, however, Assurance Services International (ASI) has begun issuing major nonconformities to certification bodies for not having addressed the issue of certificate holders operating with management plans that are not adjusted to take account of FSC's IFL requirements. Assuming that this issue is widespread among certificate holders in Latin America and Africa whose management units overlap with IFLs, and that issues with renegotiating management plans are genuinely intractable, once nonconformities are passed on to certificate holders they are likely to be forced to terminate their certification.

Faced with the possibility of losing certificate holders at scale in countries where Motion 23 pilots are ongoing expressly to address challenges with IFL requirements²², the Board approved two temporary exemptions from FSC requirements. These exemptions, limited to countries with Motion 23 pilots and valid only until the end of 2026, were summarised as follows in the decision record²³:

1. A first temporary exemption allows existing certificate holders in countries with registered pilots that have management plans approved by public authorities before IFL rules became effective to maintain those management plans provided that implementing those plans does not lead to any overharvesting outside of IFL core areas.
2. A second temporary exemption allows existing certificate holders in countries with registered pilots and located in pilot landscapes to carry out forest management activities in a very limited portion of IFL core areas provided that landscape dialogues outcomes confirm high protection levels of IFLs at the landscape level and strong stakeholder support for lower IFL core area thresholds in correspondence with this exemption.

These exemptions were implemented through two formal derogations²⁴.

At the time of writing, the FSC Document Centre²⁵ listed Forest Stewardship Standards for 44 countries with IFLs (including four countries covered by the regional standard for Central America, namely Guatemala, Honduras, Nicaragua and Costa Rica). Standards for six of these countries predated the IFL IGIs released in 2018, and so did not include core area thresholds. (Even if the effective dates for these standards were after 2018, the new IGIs came too late in the standard development process to be taken into account.) Of the remaining standards, nine had thresholds of 50%, one had a threshold of 51% (French Guiana), one had a threshold of 70% (Guyana), 19 had thresholds of 80%, and one had a threshold of 100% (Norway). While not including a core area threshold, the standard for Finland simply stated that industrial activities were not allowed in IFLs. The standards for Brazil and Peru replicated the text of ADVICE-20-007-18 V3-0 and V2-0 respectively, so allowed for thresholds of 80 or 50%. The standards for China and Papua New Guinea did not specify thresholds. The Russian standard included a sliding scale of core area thresholds of 30, 50 or 80% depending on conditions²⁶, while in the Swedish standard the management of IFLs was "adapted to the land use history of the stand and to existing conservation values".

²² Local FSC staff have estimated potential losses of certified area of 1.5-2.5 million hectares in Brazil (from a total of around 9.5 Mha in country) and 3 Mha in the Republic of the Congo (basically the entire certified area).

²³ *Decision Record of Board Meeting 101*, available to FSC members via <https://members.fsc.org/en/Members>.

²⁴ DER-STD-60-004_01 V1-0 EN *Exemption from recalculating AAC based on harvestable area and adjusting management plans accordingly* (available at <https://connect.fsc.org/document-centre/documents/resource/2050>) and DER-STD-60-004_02 V1-1 EN *Exemption to carry out limited industrial activity within IFL core areas* (available at <https://connect.fsc.org/document-centre/documents/resource/2051>).

²⁵ See <https://connect.fsc.org/document-centre>, accessed 23 July 2025.

²⁶ Note that there are no active FSC Forest Management certificates in Russia at present; see <https://fsc.org/en/fscs-position-on-russias-war-on-ukraine>; accessed 30 July 2025.

6 A survey of stakeholder views

6.1 A brief summary of and commentary on stakeholder views

This section is based primarily on the verbal and written input of the stakeholders whose contributions are gratefully acknowledged in section 2, structured in terms of the Board brief for this discussion paper (see section 3). While by no means exhaustive, it does reflect a wide range of stakeholder views. Some points are expanded upon by the author with reference to published sources. Only the broad themes are highlighted here; for an extended summary of the input received, see Annex C.

Attitudes to IFLs

Overall attitudes to Intact Forest Landscapes varied widely among stakeholders, although negative views related to the concept and definition rather than to the forests themselves; for example, one stakeholder described them as an artificial construct while another felt that they mattered only because the FSC membership had (rightly or wrongly) voted in the concept. In this context, it is worth noting that several stakeholders expressed surprise or even regret that Motion 65 had passed now that the implications had become clearer.

Most stakeholders described the specific values they associated with IFLs, which were mostly similar to those identified in published literature (see section 4.3). Unsurprisingly, given the climate and biodiversity crises, many stakeholders highlighted the importance of IFLs for biodiversity and climate change mitigation, although other ecosystem services, social values and economic values were also mentioned. One stakeholder stated that, if we lose IFLs, we lose the fight against climate change.

One stakeholder suggested that these forests have these values because they are large, not because they are IFLs, and that if they were logged and well managed they might lose their status as IFLs but still store carbon and harbour biodiversity. This seems like a difficult point on which to generalise, and probably depends very much on the forest and the management. For example, regarding climate change mitigation, Potapov *et al.* (2017) found that “IFLs in the boreal and temperate regions differ from those in the tropics by having lower biomass per unit area and lower productivity than managed forests”; conversely, it has already been noted (see section 4.3) that carbon density is generally greater in tropical IFLs than in other tropical forests. Some species, such as woodland caribou (*Rangifer tarandus caribou*), are particularly susceptible to human disturbance (Williams *et al.*, 2021).

Threats to IFLs

Threats to IFLs described by stakeholders were mostly similar to those identified in published literature (see section 4.4).

One stakeholder proposed that the current narrow view of economics based on timber and international trade was a threat. While FSC’s Criterion 5.1 directs certificate holders to “identify, produce, or enable the production of, diversified benefits and/or products, based on the range of resources and *ecosystem services** existing in the *Management Unit** in order to strengthen and diversify the local economy”, some stakeholders have suggested that certificate holders are slow to consider changes to business models based on harvesting a relatively small number of timber species. Increasing the range of commercially harvested species has been described as “probably the most important biophysical challenge for sustaining timber yields from Amazonian forests” (Sist *et al.*, 2021).

As for ecosystem services, FSC has already provided a mechanism for impact verification and sponsorship²⁷, but uptake remains low. Other means of ensuring the economic viability of IFL management must certainly be pursued (see section 7.1).

The exclusion of Indigenous and traditional rights holders was identified as a threat, although it was also acknowledged that FSC was well placed to support co-management thanks to its incorporation of FPIC. Fa *et al.* (2020), in their review of the importance of Indigenous Peoples' lands for the conservation of IFLs, concluded that "Granting Indigenous Peoples formal legal titles to their forests must be seen as the most critical mechanism for slowing forest loss and protecting these lands from uncontrolled and unregulated resource extraction". The relationship between Indigenous legal tenure and forest preservation is borne out by the work of Baragwanath and Bayi (2020), who showed that "granting property rights significantly reduces the levels of deforestation inside indigenous territories". More specifically, the example of the Maya Biosphere Reserve in Guatemala has shown that FSC-certified community management can be even more effective than nominally protected areas in minimising deforestation, enjoying the greatest success where "resident communities have a long history of forest-based activity or... the forest concession itself is not populated and is located in a remote area, managed from afar by a local organization" (Hodgdon *et al.*, 2015).

FSC's role in defining IFLs

FSC uses (part of) the definition of IFLs set out on the Intact Forest Landscapes website (see section 5.3), and to that extent, as a term defined by a third party, it is beyond FSC's control. However, there are precedents for FSC altering third party definitions to suits its purposes; see the various terms in the glossaries of the Principles and Criteria and IGIs which are "adapted from" or "based on" other sources. FSC certainly has the option of expanding upon or clarifying the application of a definition. In this context, it is perhaps worth noting the wording of Statutory Motion 7/2014, which stated that "FSC will define intact forest landscapes (IFLs) in the FSC Glossary"; while the Global Forest Watch definition was quoted, there was no explicit commitment to adopt it.

As previously noted (see section 4.2), even the originators and proponents of the global IFL definition have acknowledged that other criteria might be more appropriate at regional or national levels, though without judging whether size thresholds should increase or decrease or whether human influence criteria should be more or less restrictive. Venier *et al.* (2018) have suggested that the IFL size threshold is too small to meet conservation objectives in the boreal forest, for example, but also that it might not be feasible to identify areas large enough in the Canadian context to accommodate the most extensive natural processes or wide-ranging species.

Stakeholders were roughly evenly split over whether the IFL definition used by FSC was fit for purpose. One felt that it was naïve to ask the question, as any other definition would not be an IFL. However, it was also suggested that implementation issues were the result of FSC using only part of the full IFL definition, and that FSC should clarify its application. Published papers are much more explicit about the human impacts and timeframes considered (see section 4.1); in particular, Yaroshenko *et al.* (2001) devoted nine pages to describing the anthropogenic influences on forests.

Criticism of the definition included that it is Eurocentric and fails to account for the role of Indigenous Peoples, that it is unclear (and that some members would not have voted for Motion 65 if they had

²⁷ FSC-PRO-30-006 V2-1 EN *Ecosystem Services Procedure: Impact Demonstration and Market Tools* (available at <https://connect.fsc.org/document-centre/documents/resource/316>).

better understood the definition), that it is too rigid and fails to take account of context, and that the binary distinction between intact and not intact is too simplistic. Some of the limitations of the approach to defining IFLs have already been noted (see section 4.2), including the differences from the sort of value-based definitions more often used by Indigenous Peoples. Several stakeholders commented on the gulf between the Western concept of wilderness and non-Western attitudes to the reciprocal relationships between humans and the rest of nature; Martinez (1993) was cited as a clear account of this in the context of sustainable forestry.

One practical suggestion regarding FSC's role in defining IFLs was that taking account of the time elapsed since human activity might allow for the restoration of IFL areas. Another very practical suggestion was that, while it might not be possible for FSC to change the IFL definition unilaterally, FSC should participate in updating the HCV approach via the HCV Network.

FSC's current role in the management and protection of IFLs

Although there was positive feedback on the Motion 23 pilot process as part of exploring workable solutions for IFL protection, and a recognition that these pilots must be allowed to run their course, the majority of the feedback on FSC's current approach to IFLs was negative. There was frustration that it was taking so long to resolve this issue. Most stakeholders fell into two broad camps in terms of their criticism; a larger group who felt that IFL requirements undermined the economic case for FSC certification, and a smaller group who felt that the repeated reduction of core area thresholds meant that FSC was not protecting the vast majority of IFLs as per Motion 65.

In the first case, the argument was essentially that the threshold-based approach was counterproductive because it limited the areas available for harvesting, which compromised the economic viability of management, and therefore drove forests out of certification, with negative consequences for IFLs. It was argued that responsible FSC-certified forest management was better for IFLs than any of the likely alternatives, including forest management certified to lower standards, uncertified forest management, illegal logging or other land uses. The particular challenges faced by concessionaires, working in areas zoned for production when governments had already identified protected areas, were highlighted. As evidence, the Motion 34 reports for Brazil (Lentini *et al.*, 2020) and the Congo Basin (Form International, 2020) were cited, in which core area thresholds of 80% or 50% were found to have untenable economic and social impacts. In this context, it is worth noting that it was discussion of derogations to avoid loss of certificates which prompted the Board to call for this discussion paper. However, it should also be noted that, in their summary report, the Motion 34 Steering Committee expressed some reservations about the economic impact analyses, seeing them as a "worst case scenario" which failed to account for "alternative value sources".

In the second case, the argument was essentially that FSC was compromising IFL protections for the sake of commercial interests rather than challenging business as usual practices and economic models. It was noted that Motion 65 was brought forward precisely because existing practices had failed to protect HCV 2. It was recognised that an alternative finance mechanism was missing (see previous comments on payments for ecosystem services). A lack of transparency and publicly available data on HCVs was cited as a factor in doubts about protections.

These two broad positions could be seen as characterising the unresolved tension in the IFL debate between economically viable and environmentally appropriate management, with crosscutting social issues. More positively, both positions could be seen as having the potential to protect IFLs, but this would be based on different understandings of what that means and requires. Both are likely to require

changes to the way economically viable forest management is financed. These positions strongly influence the proposals presented for discussion (see section 7).

FSC's future role in the management and protection of IFLs, including beyond the instrument of certification

Stakeholder suggestions for certification solutions for the management and protection of IFLs ranged widely (readers are encouraged to review the responses presented in greater detail in Annex C), from dropping the concept altogether to rigorously enforcing the original core area threshold. There was some recognition that there was no single ideal solution, and also a push for solutions to be Indigenous led.

If there was any sort of majority position, it centred on better implementation of HCV requirements rather than applying specific requirements for IFLs, and moving away from the threshold-based approach. Specific suggestions included FSC-endorsed HCV assessments that would apply to all certificate holders in a particular context, rigorous outcome-oriented monitoring and adaptive management (as proposed in Motion 45/2025; see section 5.4), and a more general move towards outcome-oriented standards²⁸.

There is certainly a conceptual appeal in concentrating on better implementation of HCV requirements. As noted above, Motion 65 was motivated in large part by inadequate protection of HCV 2. There would be challenges, however. Principle 9 requires that HCVs be maintained and/or enhanced; there is no provision for any parts of HCVs to be lost or degraded. If IFLs, as currently defined, remained part of HCV 2, any management which compromised their intactness as it is currently understood would arguably be contrary to this Principle. Some explicit reconsideration of what FSC understands as intactness and what it means to protect IFLs would be needed.

It should also be noted that not everyone felt that FSC's approach needed to change; feedback from a stakeholder in Australia suggested that the current solution worked well in that national context.

Looking beyond the instrument of certification, some stakeholders struggled to envisage non-certification approaches FSC could take, and some did not see it as FSC's role.

At the landscape level, several suggestions involved dialogue platforms and landscape-level land use planning, no doubt influenced by the ongoing Motion 23 pilot process. The challenges to successful, inclusive processes were acknowledged, especially around engagement with governments and Indigenous Peoples. In particular, the challenges for Indigenous-led solutions were noted, given variations in the overlap of IFLs, Indigenous cultural landscapes and management units, and it was suggested that FSC could play a much more active role in facilitating dialogues and FPIC processes rather than leaving this to certificate holders.

Some landscape-level suggestions involved finance, and this was also a common theme at the global level. Stakeholders recognised that sources of funding were needed to offset foregone benefits – not just in terms of revenues for certificate holders but also in terms of development opportunities for local communities – and that existing mechanisms for payments for ecosystem services were not operating at sufficient scale. The failed Motion 46/2021 on funding the conservation of Intact Forest

²⁸ Note that FSC's thinking on outcome-oriented standards continues to evolve; see <https://connect.fsc.org/current-processes/revision-requirements-development-and-maintainance-fsc-country-requirements-fss>, accessed 30 July 2025.

Landscapes and Indigenous cultural landscapes was mentioned (see section 5.3), as was the repeated failure to pass motions on restoration²⁹. HIFOR³⁰ was flagged as the only market instrument currently addressing high integrity forests.

It seems clear that, whatever pathway is followed regarding IFLs, FSC must be more active in developing means of funding forest management that favour conservation. It will be important to take account of any potential social impacts from changes in business models. For example, the Motion 34 report for the Congo Basin (Form International, 2020) estimated the number of jobs likely to be lost at different thresholds of IFL protection, with 80% protection resulting in a 27% reduction in employment; consideration would have to be given as to whether conservation management or harvesting of other forest areas would offset these job losses and other socio-economic effects. Effects will be context-specific, however; the Motion 34 report for Canada (Williams *et al.*, 2021) did not anticipate any job losses in the short term (ten years) as a result of IFL protections.

Other suggestions for roles for FSC included advocating for IFLs to be considered as critical landscapes to be protected globally like Ramsar or UNESCO sites, and aligning with government expectations for other effective area-based conservation measures (OECMs) to contribute to 30 by 30 commitments under the Global Biodiversity Framework³¹.

Limits to FSC's role in relation to IFLs

There was mixed feedback on what FSC should not do in relation to IFLs, some of it contradictory and reflecting the broad divisions in positions noted above. The most common theme was around not being inflexible, or assuming that one size fits all globally, or setting too high a bar, all of which would drive certificate holders away and lessen FSC's impact.

Some stakeholders explicitly asked FSC not to give up on the topic, with one suggesting that, in the context of FSC's mission, IFLs should be among the highest priority areas, even if they are divisive and difficult.

One stakeholder highlighted the risk of losing existing environmental chamber members, or failing to attract new members, if IFL protections were dropped. There are certainly concerns within the environmental chamber about dwindling membership³², and these might be weighed against concerns about potential losses of certificates. However, another stakeholder urged FSC not to assume that it will be the "saviour of IFLs", given that forest operations occupy such a small proportion of these areas overall.

²⁹ A motion on restoration has been proposed for the 2025 General Assembly: Motion 46/2025 "FSC Shall Certify Restoration".

³⁰ See <https://hifor.org/>, accessed 30 July 2025.

³¹ See <https://www.cbd.int/gbf>, accessed 30 July 2025.

³² There is undeniably a persistent imbalance in the representation of chambers. The list of FSC members as of 31 July 2025, circulated for approval before the General Assembly, includes 671 economic chamber members, 332 environmental chamber members, and 277 social chamber members. However, figures for 2021-2024 collated by the proposers of Motion 11/2025 "Strengthen the membership in FSC to strengthen the FSC system" show that, while there have been gains and losses of members every year, the total number of members in each chamber was relatively stable over the period.

6.2 Finding a way forward

From the previous section it will be clear that stakeholder opinions on IFLs are diverse and divided. Some stakeholders do not even agree that FSC should be engaging with the concept, and many disagree with FSC's current approach of setting thresholds for core areas in which industrial activities are severely restricted. Identifying common ground for the majority of stakeholders is challenging.

It also seems clear that stakeholders and IFLs have not been well served by past decision-making processes. The General Assembly and the motions process are at the heart of FSC's identity as a membership organisation, but they have limitations. In the past, including when Motion 65 was passed, there was less formal preparation for the General Assembly and no impact assessment of motions, which could change right up to moment they were voted on; however, there was still some scope to debate motions during the Assembly. Now there is far more formal preparation, with many member meetings to discuss motions in the months before the Assembly, and the secretariat is required to assess the implications of motions. The scope for amending motions is much more limited. However, FSC's membership has now grown to the extent that meaningful debate about motions on the Assembly floor is not feasible. It is apparent that many members did not fully understand what they were voting for when they passed Motion 65, and many now regret it. The motions process has continued to push and pull at the subject of IFLs ever since. The continuing divisions among stakeholders might be explained in part by the fact that there has not been a broad, inclusive process to build understanding and agreement.

Other controversial topics in the FSC system, such as controlled wood and conversion, have been the subject of lengthy consultation and policy development processes to build consensus³³. A lengthy process does not appear to be an option with IFLs, however, or at least a short-term solution is urgently needed. Stakeholder comments and recent Board decisions show that there are very real risks of certified areas stagnating or even shrinking in countries with IFLs, including countries with natural tropical forests, even though growing the certified area of natural tropical forests is part of FSC's 2026 objective³⁴. The lack of uptake of certification in these countries also means that FSC is not currently playing a meaningful role in the protection of IFLs, as evidenced by the figures of Zwerts, van der Linde *et al.* (2024) who found that only 0.6% of the global IFL area was FSC certified.

There is little agreement on what the management and protection of IFLs in FSC certified management units should entail³⁵. Many stakeholders view the approach taken in Motion 65 and ADVICE-20-007-18 as too restrictive and counterproductive. However, many of the issues raised are already reflected to some degree in the Principles and Criteria, for example monitoring, adaptive management, and the avoidance of negative impacts from infrastructural development and harvesting. This is even the case for some of proposals in draft motions for the 2025 General Assembly, including Motion 45/2025 on "Moving beyond fixed thresholds to outcome-based conservation for Intact Forest Landscapes (IFLs)". There is a need to consider how existing FSC requirements might evolve, including through the ongoing

³³ Resulting in the *Strategy for FSC Mix products and controlled wood* (available at <https://fsc.org/en/newscentre/general-news/the-controlled-wood-strategy-is-now-available>) and FSC-POL-01-007 V1-0 EN *Policy To Address Conversion* (available at <https://connect.fsc.org/document-centre/documents/resource/1445>).

³⁴ See the *FSC Global Strategy 2021–2026: Demonstrating the value and benefits of forest stewardship* (available at <https://fsc.org/en/global-strategy>).

³⁵ Some stakeholders and published sources (e.g. Kleinschroth *et al.*, 2019) have stressed that protected areas are the best solution for IFLs (a land sparing approach), but that FSC is the wrong mechanism to deliver this (as a land sharing approach).

revision of the Principles and Criteria³⁶, but it is also important to consider how all parties, especially certificate holders, can be supported in implementing them as effectively as possible. This is particularly challenging when market prices for forest products, even FSC certified products, are insufficient to cover the true costs of responsible forest management.

It is also necessary to recognise the limits of what can be accomplished directly through certification. There is only so much that can be asked of certificate holders, and much is beyond their control, particularly national land use planning and the division of IFLs into protected areas and concessions. While some have questioned whether it is appropriate for FSC to look beyond certification, and others have questioned how much influence FSC has over other actors, particularly governments, the Board has explicitly mandated a consideration of “the overall role that FSC can play in the definition, management and protection of IFLs, including beyond the instrument of certification”.

In formulating the proposals for discussion in the next section, therefore, it has been necessary to take into account:

- The lack of stakeholder agreement on even the most fundamental aspects of the topic.
- The need to build broad stakeholder understanding and agreement, but equally the need to take urgent action to maintain the viability of the FSC system in some settings.
- The diversity of opinions on certification solutions.
- The existing provisions of the FSC system.
- The limits of certification solutions and the potential for FSC to take other actions.

³⁶ See <https://connect.fsc.org/current-processes/joint-revision-fsc-principles-and-criteria-international-generic-indicators-and>, accessed 30 July 2025.

7 Proposals for discussion

The proposals in this section are not in any sense FSC policy. They were developed by the author based on stakeholder input, and are presented as a basis for discussion. They have no formal status, and can and should change in response to further stakeholder engagement.

Three proposals have been developed, reflecting some of the broad stakeholder positions outlined in section 6.1. The first (section 7.1) reflects the view expressed by some members of the environmental chamber that FSC has compromised IFL protections for the sake of commercial interests and should implement Motion 65 as it was originally intended. The second (section 7.2) reflects the more widely held view that the current approach has been counterproductive because it has limited the areas available for harvesting, which has compromised the economic viability of management, and therefore driven forests out of certification, with negative consequences for IFLs; because it aims to reflect the majority view, and is therefore hopefully the most viable option, this proposal is set out in the greatest detail. The third (section 7.3) reflects cross-cutting social concerns, especially in relation to Indigenous Peoples' rights and tenure.

To some extent these proposals are mutually exclusive. Most obviously, the first and second proposals are based on very different understandings of what it might mean to protect IFLs; in discussing these proposals, members must consider which of these viewpoints should take precedence, or whether there is a way of reconciling them which has escaped the author. However, there are also commonalities. Alternative finance mechanisms (discussed at greatest length in section 7.1) are important in every scenario. Although a formal policy development process was originally envisaged as part of the second proposal (see section 7.2), it could also have a place in refining the approach in the first proposal over time. The cross-cutting social considerations should be taken into account whatever approach is eventually taken to IFLs.

The Motion 34 reports, available at <https://connect.fsc.org/stakeholder-engagement/focus-forests>, provide useful additional context regarding the pros and cons of the current threshold-based approach to IFL protection in a range of boreal and tropical settings.

In terms of ongoing motions processes, Motions 43/2025 and 48/2025 could be compatible with the first or second proposals. Motion 45/2025 could be compatible with the second proposal, but explicitly rejects the threshold-based approach in the first. All should be compatible with the cross-cutting social considerations.

In terms of the Board mandate for this discussion paper, to include “a proposal for a new strategic approach towards IFLs” (see section 3), many would argue that the first proposal is not new; others would argue that this does represent a new approach, because Motion 65 has never been implemented as it was intended. It should be noted that the Board conceived of this discussion paper “as input to membership dialogues leading up to the General Assembly”, with the outcome of those dialogues “expected to inform the 2027-2032 Global Strategy”. However, the proposals have been driven by the stakeholder input received, and include suggestions for actions to be taken long before the 2027-2032 Global Strategy would come into effect.

7.1 First proposal – Recommitting to the implementation of Motion 65

It should be noted, based on the initial survey of stakeholder views and feedback on the first draft of this discussion paper, that only a minority of stakeholders have expressed support for this approach. Many other stakeholders have argued against retaining a threshold-based approach. Elements of the second proposal, particularly a policy process to refine the approach to IFLs over time, could also be relevant to this proposal.

On the basis that:

- The current approach to IFLs is not working – FSC has never implemented Motion 65 as it was originally intended, and has repeatedly weakened thresholds for protected core areas.
- As a result, the intent of Motion 65 has not been achieved, and we cannot claim to be protecting the vast majorities of IFLs.

The following proposal is offered for discussion:

- We acknowledge that, owing to the biodiversity and climate crises, it is more vital than ever to protect the intactness of IFLs, and that this must take precedence over other considerations.
- We acknowledge that, through Motion 65, FSC committed to protect the vast majorities of IFLs through its Forest Stewardship Standards. We recognise that the quality and quantity of protection must be meaningful in practice.
- We acknowledge that, while some elements of Motion 65 have received considerable attention, particularly landscape-level approaches, others have been neglected, especially the development of low-impact/small scale forest management, and the promotion of alternative models for forest management/conservation.
- We agree to reinstate the original default core area threshold of 80%. Forest Stewardship Standards may specify higher thresholds, but may specify lower thresholds only in exceptional circumstances, when the extent of legally protected areas would mean that at least 80% of IFL area would still be protected at the national level. Motion 23 pilot tests will be allowed to run their course, and might inform changes to this approach in due course.
- We recognise that this approach will require fundamental changes to business models and funding mechanisms in many cases, and we commit to supporting these changes.
- We accept that this approach will lead to losses of certified area in the short term.

The advantages of this approach would include very clear messaging about FSC's position on IFLs, and leadership on their protection. There would be opportunities to strengthen FSC's position on certifying conservation areas, including through ecosystem services claims. There are already some moves in this direction in new certification schemes which exclude HCV areas from commercial forestry³⁷.

The disadvantages of this approach would include severely limiting the potential for income from harvesting of forest products in any management units with significant areas of IFL. At present, payments for ecosystem services have still not reached the scale needed to offset this foregone income and might never reach the scale necessary to offset the full opportunity costs. Many forest managers would reject FSC certification rather than accept such limitations. It is not clear whether governments would accept proposals to manage concessions on this basis.

In terms of the Motion 65 aim of protecting the vast majorities of IFLs, this approach would clearly meet that aim within FSC certified management units. However, unless and until payments for

³⁷ See <https://aeforest.eu/> and <https://www.ekoskog.org/english>, accessed 30 July 2025.

ecosystem services were scaled up significantly, and perhaps not even then, it would be likely to reduce the already small proportion of IFLs certified and increase pressure on those not certified, thus limiting the overall effectiveness of this approach in achieving the aim of Motion 65.

The following sub-sections expand on elements of this proposal.

Meaningful protection for IFLs

This proposal is based on rigorous implementation of the original intent of Motion 65 and FSC's formal definition of IFLs, and protection has been understood on that basis.

In terms of qualitatively meaningful protection, FSC's definition of "Conservation/Protection" in the Principles and Criteria refers to "management activities designed to maintain the identified environmental or cultural values in existence long-term", but also allows for activities "compatible with maintaining" such values. However, as the characteristic of being "minimally influenced by human economic activity" is integral to the definition of IFLs, anything which exceeds this is taken to be inconsistent with protection. FSC's definition of "Industrial activity" – "Industrial forest and resource management activities such as road building, mining, dams, urban development and timber harvesting" – is taken to be a reasonable measure of this, given that it is closely aligned with the full definition of IFLs on the Intact Forest Landscapes website (see section 4.2).

In terms of quantitatively meaningful protection, the original default core area threshold set in Motion 65 – "an area of forest comprising at least 80% of the intact forest landscape falling within the FMU" – is taken to be a reasonable understanding of what constitutes the vast majorities of IFLs. The Oxford Dictionary of English defines "majority" as "the greater number" and "vast" as "of very great extent or quantity; immense". The 50% core area threshold currently allowed in certain circumstances under ADVICE-20-007-018 (see section 5.3) and implemented in several current Forest Stewardship Standards (see section 5.4) does not even constitute a majority, much less a vast majority. Even considering the other provisions of Motion 65, such as taking into account scale, intensity and risk and assessing alternative land use options, an 80% core area threshold is taken to be the minimum that would meet the intent of the motion in all but exceptional circumstances.

In this context, it is worth reiterating the point made previously (see section 6.1) that Principle 9 requires the maintenance and/or enhancement of HCVs, and that there is no provision for any parts of HCVs to be lost or degraded. Although many stakeholders view the restrictions imposed by a threshold-based approach to be extreme, they actually represent a compromise by allowing management which might not maintain the characteristic of intactness in at least parts of IFL areas. Even with an 80% core area threshold, management activities in the remaining areas might result in up to 20% of certified IFL areas being lost from the global IFL map based on the current IFL definition. Arguably, in order to maintain the High Conservation Value of IFLs as currently defined, industrial activity should be prohibited in all parts of IFLs.

Standard developers should certainly have the option of setting higher protection thresholds, as they have already done in some Forest Stewardship Standards, with complete protection of IFLs specified in Norway and Finland (see section 5.4). The findings of the Motion 23 pilot process might eventually suggest circumstances under which lower protection thresholds might be justified, but in the meantime it seems reasonable, on a precautionary basis, to restrict this strictly to cases where the extent of legally protected areas would mean that at least 80% of IFL area would still be protected at the national level.

Changes to the normative framework would be required to implement this proposal. IFL International Generic Indicators would remain appropriate – the allowances for limited industrial activity in core areas in the IGLs are consistent with the provisions of Motion 65 – but instructions for standard developers in Annex H section A would have to change to limit the scope for lowering core area thresholds. Guidance for standard developers in FSC-GUI-60-004 would also have to change. ADVICE-20-007-018 would have to revert to something closer to its original wording (see section 5.3), and the derogation allowing “forest management activities in a very limited portion of IFL core areas” would have to be withdrawn (see section 5.4).

Many normative requirements would remain relevant, however, including those in IGI Annex H section B for indicators developed for the identification and designation of core areas to respect the right to Free, Prior and Informed Consent of affected rights holders and to ensure that the legal and customary rights of affected rights holders to use the core areas are upheld. Guidance for forest managers in FSC-GUI-30-010 would also remain relevant.

Funding mechanisms

In some settings, such as legally protected areas or areas voluntarily managed primarily for conservation, this proposal would have no negative effects on management or finance models, except that it would limit developments in core areas e.g. for recreational facilities. FSC certification of such areas is very limited compared to the certification of areas managed for timber or other forest products, even though there is a specific category of certificate – forest management (FM) only, as compared with joint forest management/chain of custody (FM/COC) – intended explicitly for “applicants that do not intend to sell any forest products according to their management objectives, e.g. in the case of National Parks, conservation areas, water protection areas”³⁸. This is despite the fact that FSC’s Ecosystem Services Procedure now provides a mechanism for ecosystem services impacts to be verified and sponsored. FSC could certainly do more to promote FM certification and ecosystem services verification to governments, NGOs and other potential conservation-focussed land managers, and to connect them with potential funders.

Of course, the vast majority of current FSC certificate holders are certified because they trade in forest products. For any whose management units overlapped with IFLs, this proposal would mean that harvesting would be largely limited to reduced impact industrial activities in non-core areas and low impact activities in core areas. For many this would require fundamental changes to their business models, and alternative sources of income would be needed to ensure economic viability. This could include harvesting a wider range of timber and non-timber forest products, or processing existing products more efficiently, but it could also include verification of ecosystem service impacts through the Ecosystem Services Procedure or using other mechanisms to secure payments for ecosystem services.

Feedback from stakeholders and a recent review of potential revenue streams in the tropics (Polinder *et al.*, 2025) suggest that the potential for ecosystem services payments is still limited and not enough to replace timber revenues. The Motion 34 report for Brazil concluded that there was little hope of alternative funding compensating for the economic losses associated with 80% IFL protection (Lentini *et al.*, 2020), while the report for the Congo Basin concluded that the loss of revenue would result in

³⁸ See table 1 in FSC-STD-20-001 V5-0 EN *General Requirements for Certification Bodies* (available at <https://connect.fsc.org/document-centre/documents/resource/280>). A recent search for valid FM certificates at <https://search.fsc.org/en/> (accessed 2 September 2025) revealed only 12 certificate holders.

fewer resources being available for protection, thus increasing the risk of poaching (Form International, 2020). At the very least, FSC must intensify efforts to connect certificate holders with verified ecosystem services claims with sponsors³⁹. It is surely possible to build compelling cases for investment in IFL areas, similar to what has been done for high integrity forest with HIFOR.

It does not seem unreasonable, given the expectations this scenario would place on certificate holders managing IFL areas, for FSC to facilitate direct financial support, even if certificate holders do not have verified ecosystem services claims (although verified claims could perhaps justify greater levels of support). There would seem to be a role for FSC Investments and Partnerships⁴⁰. Another alternative could be to revisit the failed Motion 46/2021 “Incentives and benefits for the conservation of Intact Forest Landscapes and Indigenous Cultural Landscapes” (see section 5.3). Based on stakeholder feedback, such an initiative might receive more support if it drew on a wide range of sources of funding and distributed funds equitably among all parties involved in IFL management and protection.

Some stakeholders have recommended aligning with government expectations for other effective area-based conservation measures to contribute to 30 by 30 commitments under the Global Biodiversity Framework. Assuming that strict protection met expectations for OECMs, this might present opportunities for government funding for IFL management. Potential links have also been suggested with cooperative and non-market approaches to implementing nationally determined contributions under the Paris Agreement⁴¹, which might give access to climate finance. REDD+⁴² has also been mentioned in this context. These options would emphasise the significance of IFLs in tackling the biodiversity and climate crises.

One obvious fit for financing the protection of IFLs, at least in tropical countries, is the proposed Tropical Forest Forever Facility⁴³. A particularly welcome feature is that at least 20% of the funding is expected to go to Indigenous Peoples and local communities.

While meaningful changes to business models are likely to depend primarily on new sources of income, there might also be opportunities to reduce costs. One stakeholder has suggested reduced or zero Annual Administration Fee (AAF) payments for strictly protected areas. However, as these are already only \$0.0001 per hectare for natural forest managed for conservation purposes⁴⁴, any cost saving would seem to be trivial. A more radical option would be for the costs of third-party audits to be subsidised for FM certificate holders.

One of the questions posed in the Motion 34 summary report was, “If the main problem is that the market doesn’t pay for forest protection, should we put more effort into identifying additional sources of value in a landscape or forest management unit that could help to deliver market benefits and make forest protection in IFLs economically beneficial?” The obvious answer is yes. All of the options summarised above should be evaluated, and some or all of them prioritised and pursued in an IFL funding strategy.

³⁹ See <https://fsc.org/en/verifiedimpact> (accessed 2 September 2025).

⁴⁰ See <https://fsc.org/en/donate> (accessed 2 September 2025).

⁴¹ See <https://unfccc.int/process-and-meetings/the-paris-agreement> (accessed 2 September 2025).

⁴² See <https://redd.unfccc.int/> (accessed 3 September 2025).

⁴³ See <https://tfff.earth/> (accessed 2 September 2025).

⁴⁴ See table 1 in FSC-POL-20-005 V3-6 EN *Annual Administration Fee (AAF)* (available at <https://connect.fsc.org/document-centre/documents/resource/221>).

7.2 Second proposal – Rethinking the protection of IFLs

This is the proposal which was included in the first draft of this discussion paper, with various modifications based on both positive and negative stakeholder feedback. It has been retained as the most detailed proposal because of the broad – though by no means complete – support it has received from stakeholders so far.

On the basis that:

- The current approach to IFLs is not working – it does not appear to be protecting IFLs, and it is leading to stagnation or loss of certified area, including in the natural tropical forests prioritised in the FSC Global Strategy.
- It is in everyone's interest to find a workable solution, if only to avoid undermining the FSC system.

The following proposal is offered for discussion:

- We acknowledge that, while there is not universal support for the protection of IFLs as currently defined, there is widespread recognition of the values inherent in large areas of natural forest.
- We acknowledge that, for various reasons, the implementation of Motion 65 has not succeeded in meeting the aim of motion to protect the vast majorities of IFLs but has created systemic challenges for FSC.
- We acknowledge that we must urgently find a workable short-term solution – even if it is only an interim solution – if we are to achieve an appropriate level of protection for large landscape-level forests while ensuring the viability of forest management and associated livelihoods.
- We acknowledge that reaching agreement on a longer-term solution will be difficult.
- In the short term, we agree to halt the implementation of any specific IFL normative requirements, including ADVICE-20-007-18. Where local adaptations of IFL requirements have achieved broad stakeholder support, standard developers may choose to retain them, but standard developers may also choose to silence IFL indicators which are not supported by stakeholders. Motion 23 pilot tests will be allowed to run their course. Otherwise, we agree to treat IFLs in the same way as other instances of HCV 2. We focus on supporting local standard developers to produce robust National HCV Frameworks, supporting certificate holders to implement them, supporting certification bodies to audit conformity, and supporting Indigenous Peoples, traditional peoples and local communities to engage effectively at all stages, to ensure that the requirements of Principle 9 deliver real impact for all HCVs. We accept that this will incur costs for all parties, and seek sources of funding to cover them.
- In the medium term, we agree to develop a formal policy on IFLs. We put in the effort necessary to achieve consensus among the broadest possible range of stakeholders. We also accept that, in order to achieve consensus, the policy might be framed in different terminology or have a different scope, for example in terms of natural forest.
- In the longer term, we implement the policy. This is likely to involve integrating elements of the policy into the Principles and Criteria, so a timely policy process is vital to align with their current revision. We recognise that it is likely to be necessary to allow standard developers significant flexibility to adapt international requirements at the regional, national or sub-national level.

The main advantage of this approach would be to stem the stagnation or shrinkage of FSC certified area in IFL countries. It could potentially bring more IFL areas into FSC certification, and avoid them being managed to lower standards or converted to other land uses.

The main disadvantage of this approach would be that, while good practices might reduce the impact of harvesting on biodiversity, carbon storage and other values, they would not preserve the characteristic of intactness as it is currently defined. A move away from threshold-based protection might cause some environmental chamber members to withdraw their support from FSC.

In terms of the Motion 65 aim of protecting the vast majorities of IFLs, while this approach would have the advantage of potentially bringing more IFLs into FSC certification, the outcomes would be negative if protection were understood to mean the exclusion of industrial activity from large parts of IFLs. As such, this approach is only viable if we are willing to reconsider what it means to protect HCV 2.

The following sub-sections expand on elements of this proposal.

Halting the implementation of IFL requirements

The short-term proposal is based on the recognition that something must change if any IFLs are to remain under FSC certification, and that the core area threshold approach has only resulted in pressure to reduce thresholds. It is an attempt to break the cycle of motions, advice notes and derogations, and to put in place workable protections until the Motion 23 pilots have run their course and a clear policy position on IFLs can be agreed.

None of the stakeholders approached during the preparation of this discussion paper expressed any concerns about FSC's general requirements for High Conservation Values (although some questioned how well they were implemented; see below). The issues appear to be with the IFL-specific requirements, and while some stakeholders have called for these to be retained and not weakened any further, most, across all three chambers, have viewed them as counterproductive. One stakeholder stated that "FSC requirements are self-imposed structural barriers to success".

The short-term proposal includes halting the implementation of IFL-specific normative requirements (see section 5.3), namely ADVICE-20-007-18, relevant elements of the International Generic Indicators, and, depending on stakeholder views, relevant elements of Forest Stewardship Standards.

In the current version of the IGIs⁴⁵, relevant elements include instructions for standard developers under Criterion 9.2, generic indicators 9.2.4, 9.2.5, 9.2.7, 9.3.3 and 9.3.4, and Annex H. Note that the proposal is not to remove IFLs from the normative framework entirely; crucially, they would remain part of the definition of HCV 2, and so it would be appropriate to retain references to sources of information on IFLs in instructions for standard developers under Principle 9 and Criterion 9.1, and potentially even to retain IGI 9.1.2 on the identification of IFLs, although the reference to Annex H in the instructions for standard developers under Criterion 9.1 would become redundant. Similarly, references to IFL core areas in instructions for standard developers under Criteria 5.2 and 7.3 and in Annex E would become redundant, but references to IFLs in IGI 3.1.2 and instructions for standard developers under Criterion 6.5 could be retained.

⁴⁵ FSC-STD-60-004 V2-1 EN *International Generic Indicators* (available at <https://connect.fsc.org/document-centre/documents/resource/262>).

As noted in section 5.4, many Forest Stewardship Standards contain core area thresholds⁴⁶. Some of these might have broad stakeholder support; for example, the fact that a threshold of 100% has been set in Norway suggests that complete protection of IFLs is accepted by stakeholders. However, in other cases thresholds are known to have been imposed contrary to the views of stakeholders, for example the 50% threshold for countries in the Congo Basin. The short-term proposal therefore includes allowing standard developers to decide whether or not to halt the implementation of IFL indicators or other relevant elements of Forest Stewardship Standards based on the views of stakeholders. If national or regional IFL requirements have broad stakeholder support, they may be retained, but if not they may be silenced. Where there is no active standard development group, this decision could be taken by a network partner, but on a precautionary basis, in the absence of a local decision-making body, the default position could be to retain requirements. A process for the FSC secretariat to approve decisions on national or regional IFL requirements could provide a measure of global consistency and address the concerns of some stakeholders about local decision making.

These normative changes would not remove all protections for IFLs, as they would remain HCVs. However, they would shift the focus away from core area thresholds.

Regrettably, the mechanism for implementing this part of the proposal would be yet another advice note.

This proposed halt in the implementation of existing IFL-specific requirements must not be seen as a period of passivity. The FSC secretariat, certificate holders and other stakeholders must work to enhance the implementation of other HCV requirements, including monitoring and adaptive management requirements, and to feed the lessons learned, along with the outcomes of Motion 23 pilots, into policy development and implementation.

Enhancing the implementation of HCV requirements

It has been noted by some stakeholders that Motion 65 was necessary only because the implementation of FSC's HCV requirements had failed to protect large landscape-level forests. Nevertheless, many stakeholder expectations in relation to such forests should, in theory, be addressed by the Principles and Criteria⁴⁷, including among others:

- Protecting management units from unauthorised or illegal resource use, settlement and other illegal activities (Criterion 1.4).
- Identifying and upholding Indigenous Peoples' rights (Principle 3), with delegation of control over management activities to third parties requiring Free, Prior and Informed Consent (Criterion 3.2).
- Contributing to maintaining or enhancing the social and economic wellbeing of local communities (Principle 4), with delegation by traditional peoples of control over management activities to third parties requiring Free, Prior and Informed Consent (Criterion 4.2).

⁴⁶ In ongoing standard development processes, even in the absence of IFL-specific requirements in the IGLs, standard developers would still be able to define thresholds for conservation zones and protection areas, under Principle 9 or in the context of the conservation areas network under Criterion 6.5, if this was considered an appropriate strategy. Minimum requirements for the conservation areas network would also remain.

⁴⁷ For the latest version, see FSC-STD-01-001 V5-3 EN *FSC Principles and Criteria for Forest Stewardship* (available at <https://connect.fsc.org/document-centre/documents/resource/392>).

- Normally harvesting products and services from the management unit at or below a level which can be permanently sustained (Criterion 5.2).
- Protecting rare species and threatened species and their habitats in the management unit, taking into account the geographic range and ecological requirements of rare and threatened species beyond the boundary of the management unit (Criterion 6.4).
- Identifying and protecting representative sample areas of native ecosystems and/or restoring them to more natural conditions, with the size of the areas and the measures taken for their protection or restoration being proportionate to the conservation status and value of the ecosystems at the landscape level (Criterion 6.5).
- Not converting natural forest or HCV areas to plantations or to non-forest land use except when the conversion does not damage or threaten HCVs, nor any sites or resources necessary to maintain or enhance those HCVs (Criterion 6.9).
- Monitoring and evaluating the environmental and social impacts of the activities carried out in the management unit, and changes in its environmental condition (Criterion 8.2).
- Analysing the results of monitoring and evaluation and feed the outcomes of this analysis back into the planning process (Criterion 8.3).
- Through engagement with affected stakeholders, interested stakeholders and other means and sources, assessing and recording the presence and status of High Conservation Values (explicitly including IFLs) in the management unit (Criterion 9.1).
- Developing effective strategies that maintain and/or enhance the identified HCVs, through engagement with affected stakeholders, interested stakeholders and experts (Criterion 9.2).
- Implementing strategies and actions that maintain and/or enhance the identified HCVs, implementing the precautionary approach (Criterion 9.3).
- Demonstrating that periodic monitoring is carried out to assess changes in the status of HCVs, including engagement with affected stakeholders, interested stakeholders and experts, and adapting management strategies to ensure their effective protection (Criterion 9.4).
- Using silvicultural practices that are ecologically appropriate for the vegetation, species, sites and management objectives (Criterion 10.5).
- Managing infrastructural development, transport activities and silviculture so that water resources and soils are protected, and disturbance of and damage to rare and threatened species, habitats, ecosystems and landscape values are prevented, mitigated and/or repaired (Criterion 10.10).
- Managing activities associated with harvesting and extraction of timber and non-timber forest products so that environmental values are conserved, merchantable waste is reduced, and damage to other products and services is avoided (Criterion 10.11).

However, performance in practice has not always met stakeholder expectations, as is clear from some of the stakeholder feedback received during the development of this paper but also from current draft motions for the 2025 General Assembly. An emphasis on robust and consistent implementation of requirements, especially in relation to HCVs and adaptive management, would seem to be consistent with Motion 43/2025 “Strengthening Identification, Protection and Monitoring of Forest HCVs (1-6)” and Motion 45/2025 “Moving beyond fixed thresholds to outcome-based conservation for Intact Forest Landscapes (IFLs)”.

To move beyond the impasse apparently presented by the core area threshold approach to IFL protection, it will be necessary to rethink what IFL protection could mean in the context of Principle 9 and common guidance on the HCV approach. IFLs are incorporated into the definition of HCV 2 (see section 5.2), which deals with “large landscape-level *ecosystems** and ecosystem mosaics that are

significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance”. *Common Guidance for the Management and Monitoring of High Conservation Values* (Brown and Senior, 2018) states generally that “The overall aim of HCV management is to maintain and, where possible, enhance significant and critical environmental and social values as part of responsible management”, and more specifically states that “The management aim for conserving HCV 2 is to maintain large ecosystems, and the viable species populations that they support”:

Supporting populations of wide-ranging and apex predators will require the protection of sufficiently large, connected and/or high quality areas of habitat. This includes minimizing threats such as hunting to these species, and ensuring they have sufficient prey resources.

Similarly, the maintenance of natural ecosystem processes, such as mass fruiting or migrations, can depend on maintaining connectivity. This generally means leaving corridors of native vegetation through [management units] to connect with ecosystems outside: the corridors must be wide enough to provide secure passage of animals and movement of plant species through natural seed dispersal. Wide-ranging species or apex predators that also classify as HCV 1 may be protected using similar management strategies (e.g. habitat corridors).

Although area-based management strategies (like the identification of core areas) are covered, prescription-based strategies (i.e. based on modifications to management practices) are also included. Focusing conservation efforts on habitat scale, quality and connectivity, along with the minimisation of threats from sources such as hunting, could conserve the values associated with HCV 2 even if they do not preserve intactness as per the definition of IFLs. Note that this would address one criticism of the current approach, that it can create core area “islands” which are not connected to other areas. Providing connectivity between protected areas is also an important consideration in voluntary guidance on other effective area-based conservation measures⁴⁸, which are relevant to meeting target 3 in the Global Biodiversity Framework.

It is important to reinforce the point, now made repeatedly (see sections 6.1 and 7.1), that Principle 9 requires the maintenance and/or enhancement of HCVs, and that there is no provision for any parts of HCVs to be lost or degraded. Whatever strategies are ultimately considered to be appropriate, all HCV 2 areas must be maintained or enhanced. Even if we are satisfied that large ecosystems and viable species populations are being maintained throughout all HCV 2 areas, and we are satisfied that this constitutes the maintenance of this HCV for FSC purposes, any management activities which are not consistent with the current IFL definition might result in certified IFL areas being lost from the global map, with potential consequences in terms of reputational damage and loss of stakeholder support.

If this broad approach is accepted, how can stakeholders have more confidence that the implementation of FSC’s requirements, and in particular HCV requirements, is consistently meeting their expectations? National HCV Frameworks could play a role. Instructions for standard developers under Principle 9 in the IGIs require them to “develop a National *High Conservation Value** (HCV) Framework, which is a tool for the identification, management and monitoring of *High Conservation Values** in the country”. FSC has developed guidance for standard developers on preparing National HCV Frameworks⁴⁹. Supporting the development and implementation of robust National HCV

⁴⁸ COP-14 decision 14/8; see <https://www.cbd.int/meetings/COP-14>, accessed 30 July 2025.

⁴⁹ FSC-GUI-60-009 V1-0 EN *Guidance for Standard Development Groups: Developing National High Conservation Value Frameworks* (available at <https://connect.fsc.org/document-centre/documents/resource/423>).

Frameworks could be one way to try to address the protection of IFLs in the short term without changes to the existing FSC system.

No doubt this approach would raise many more questions at international, regional and national levels about appropriate management practices. It is clear that more needs to be done to build understanding and consensus, even where there are published sources of information on the response of environmental values to management in boreal forest (e.g. ABMI, 2015; Huggard *et al.*, 2015) and tropical forest (e.g. Bicknell *et al.*, 2014; Ellis *et al.*, 2019; Putz, Cayetano *et al.*, 2023; Putz, Zuidema *et al.*, 2012; Roopsind *et al.*, 2017). FSC could facilitate the sharing of information and perspectives at the international level, and could commission a thorough review of the available evidence, but crucial discussions would still take place at national or regional levels through standard development processes.

FSC should participate in any update to the HCV approach managed by the HCV Network.

Support, including financing

While supporting the development of robust National HCV Frameworks is important, supporting implementation is also important. The need for support is not limited to certificate holders; certification bodies might need support to be able to audit credibly, and Indigenous Peoples, traditional peoples and local communities might need support to engage in standard development processes, FPIC and other management planning processes. Support could include advice and guidance, but there is also a financial element. We cannot overlook the fact that managing forests well is expensive, but the prices paid for forest products, even FSC-certified products, often do not reflect the full costs of responsible production. This is not to suggest that FSC should bankroll commercial logging companies, but equally if stakeholders have high expectations and the associated costs are not covered by market prices, some sort of intervention is needed.

For proposals regarding finance mechanisms, see section 7.1.

Government engagement

Concession licences and the associated management plans were the barriers to reducing harvesting pressure in IFLs mentioned most frequently by stakeholders. Some believed that governments simply would not renegotiate to align with FSC IFL requirements, while others felt that logging companies had not made any serious effort to renegotiate.

Regardless of whether the way forward for the protection of IFLs involves avoiding harvesting in some parts of IFLs or modified harvesting practices in most parts of IFLs, there is likely to be some reduction in yields. Therefore, the willingness of governments to renegotiate concession licences must be ascertained.

The summary report by the Motion 34 Steering Committee stated that “Governments actually don’t recognize IFLs and even see FSC’s IFL requirements as an unwarranted intrusion into land-use planning, leading to the reduction of overall economic development including royalties or tax payments. It is therefore essential that FSC engages with governmental authorities in charge of land-use planning and forest management in the IFL discussion.”

FSC should make it a priority to reach out to governments in IFL countries to try to achieve a common understanding of the need to maintain conservation values in the vast majority of IFLs and other HCV 2 areas, even when they are outside protected areas. There are potential partners in this work, such as WWF; in a report for WWF, N'goran (2017) noted the pressures on elephants in forest areas surrounding national parks in Central Africa, for example, so there are arguments for landscape-wide conservation efforts. It would be important to discuss not only government willingness to change the terms of concession licences but also to discuss what would be necessary for certified areas to be recognised as OECMs, and the alternative revenue streams that could help to maintain economic and social benefits.

Transparency

Enhanced transparency will be a key element in the credibility of any new approach to IFL management. Whatever is done in the short term to modify FSC's approach to IFLs, communications must change accordingly to ensure that they accurately reflect what FSC certification means for the protection of IFLs. In the longer term, FSC communications will have to be aligned with whatever the implementation of an IFL policy means in practice (see below).

FSC must also press forward with making more conservation data publicly available through the Digital Audit Report and a conservation dashboard; a start has been made with the publicly available data on HCV areas collated on FSC Connect⁵⁰, but it is clear that more must be done.

There are also stakeholder demands for improved “transparency related to HCVs identification, authorship, independent review and improved management over time” (Young and Soetjiadi, 2024). Enhanced requirements for transparency from certificate holders might be best addressed through the revision of the Principles and Criteria (see below). As an alternative or supplement to this, one stakeholder has suggested that FSC should commission independent experts to produce HCV assessments to which all certificate holders must adhere; these could provide greater consistency and transparency in the evaluation of HCV status and threats.

Developing a policy on IFLs

The medium-term proposal is based on the recognition that FSC has no formal policy position on IFLs beyond that set out in Motion 65, and that the limitations of the motions process and stakeholder regrets about Motion 65 in particular make it an unstable foundation on which to build. Although this is presented as a medium-term action, in order to align with other processes and facilitate smooth implementation (see below) it would be advantageous to begin policy discussions as soon as possible.

The General Assembly remains the highest authority in the FSC system, and motions cannot simply be dismissed. But it is clear that there is very little consensus among stakeholders about IFLs, and that remaining bound to the approach built around Motion 65 will prevent FSC from finding a way forward. Motion 65 and all the subsequent developments and experiences in relation to IFLs should be used as the basis for discussing and agreeing a formal policy. The ideal timeframe for policy development (see below) should allow for lessons learned during Motion 23 pilots to be taken into account, and these

⁵⁰ See <https://connect.fsc.org/monitoring-and-evaluation/performance-and-outcomes>, accessed 29 August 2025.

might well influence a policy position on landscape approaches (see also the sub-section below on implementing policy agreements).

The development of FSC policies is governed by a procedure on *The Development and Revision of FSC Requirements*⁵¹, and follows a “Major” process type involving a sub-chamber balanced working group, public consultations and decision making by the Board of Directors. Such processes are generally very slow. However, FSC has shown that it can move more swiftly on the development of normative documents, for example in the case of the Regulatory Module to align with the EU Deforestation Regulation (EUDR). A similarly swift and focused process would be preferable here, although speed must be balanced against the need to achieve consensus among the broadest possible range of stakeholders. Ideally, policy development would be complete before the end of 2026 to align with the drafting phase of the revised Principle and Criteria (see below). This would require the mobilisation of significant resources to ensure effective engagement with a wide range of stakeholders across regions and IFL countries. Crucially, there must be meaningful engagement with Indigenous Peoples’ representatives and full consideration of the Indigenous cultural landscape concept.

One reason that the development of FSC policies is usually so slow is that they tend to contain very short statements of policy but very long associated procedures; see, for example, the *FSC Pesticides Policy*⁵². The emphasis in this process should be on the statement of policy, partly because this in itself might prove hard enough to agree, but also because the implementation of the policy should be managed through other documents in the FSC system (see below).

We must recognise that not all stakeholders agree with the approach to intactness set out in the IFL concept. The priority should be to build on such consensus as already exists. As has already been noted, none of the stakeholders approached during the preparation of this discussion paper expressed any concerns about FSC’s general requirements for HCVs and, apart from IFL issues, none expressed any concerns about the definition of HCV 2. Building on the spirit of Motion 65 and the wording of HCV 2, it might therefore make sense to approach discussions in terms of protecting the vast majorities of landscape-level ecosystems and mosaics, for example, rather than taking the divisive issue of intactness as a starting point. Alternatively, intactness could be treated as a continuum rather than a discrete state. Looking back to the earliest versions of the Principles and Criteria, another alternative could be to approach discussions in terms of natural forest or primary forest (although some stakeholders have noted that the term primary forest can be just as divisive as IFLs).

Ideally, a policy would include consideration of indirect threats to IFLs, such as insecurity of land tenure and global trends in consumption.

In some respects, it is the policy development process itself which is the desirable outcome; to have an open, informed, global discussion on IFLs with the widest possible range of stakeholders, when discussions so far have been within the FSC membership or limited to specific geographies. But the aim of the policy process should be to achieve consensus on an unambiguous position on IFLs (or whatever other terminology is considered appropriate), in contrast with the current position which is not widely supported, at least not in terms of the way IFLs are currently defined and protected. Some stakeholders have questioned why IFLs seem to be given exceptional status, whereas others clearly feel that their importance is still undervalued. FSC aims to balance what is environmentally appropriate, socially beneficial, and economically viable, but a policy might describe categories of

⁵¹ FSC-PRO-01-001 V4-0 EN *The Development and Revision of FSC Requirements* (available at <https://connect.fsc.org/document-centre/documents/resource/362>).

⁵² FSC-POL-30-001 V3-0 EN *FSC Pesticides Policy* (available at <https://connect.fsc.org/document-centre/documents/resource/208>).

forest where one of these considerations should take priority over the others (which is one reason for suggesting the explicit inclusion of plantations in the policy; see below).

As a very tentative starting point for discussion, a rough draft natural forest policy, based heavily on past and present wording in the Principles and Criteria, is presented in Annex D.

Note that a formal policy process could be equally relevant to refining the threshold-based approach in the first proposal (see section 7.1) over time.

Plantations

It would be useful to explicitly consider the role of plantations in relation to the protection of natural forest. The 1994 version of the Principles and Criteria included Principle 10, on plantations, only for review, as it had not yet been ratified. At the time, the Principle text stated that “Plantations shall complement, not replace, natural forests. Plantations should reduce pressures on natural forests.” Principle 10 was formally ratified and included in the Principles and Criteria in 1996, at which time it read as follows:

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

This position on plantations was removed from V5-0 of the Principles and Criteria, when Principle 10 was changed to address “Implementation of Management Activities”. It was followed by *FSC and Plantations: FSC’s position on plantations*, variously dated December 2012 or September 2014, which stated that:

Plantations do play a vital role in helping humans meet their needs.

By applying the rigorous FSC Principles and Criteria to plantations FSC can help ensure that plantations take, in an environmentally and socially responsible manner, some of the pressure off the world’s remaining natural forests and slow the rate of deforestation.

However, this position document is no longer available via the FSC website, and, to the best of the author’s knowledge, FSC now has no formal policy position on plantations. The medium-term proposal could be an opportunity to come up with a coherent policy on FSC’s approach to all types of forest.

Implementing policy agreements

The longer-term proposal is based on the need to implement any policy agreements, ideally through existing elements of the FSC system rather than causing undue delay and complication by creating new ones.

The most important documents in the FSC normative framework to align with the policy would be the Principles and Criteria and IGIs, hence the need for prompt policy development in line with their

revision⁵³. The Principles and Criteria and IGLs would then drive the contents of Forest Stewardship Standards, which would be main vehicles for implementing the policy.

One stakeholder suggestion to resolve issues around IFL management is to move towards more outcome-oriented and less process-based standards. There will certainly be pressure for the revised Principles and Criteria to be more outcome-oriented, in keeping with the FSC Global Strategy, and the subject of outcome orientation has dominated the discussions of the working group revising the procedure for the development and maintenance of Forest Stewardship Standards. The latest thinking on IFLs should certainly be fed into both of these processes by members and other stakeholders⁵⁴.

Depending on the contents of the policy, other normative documents might also need to be aligned, such as the *Policy for Association*.

Flexibility at the regional, national or sub-national level

Without prejudging the outcome of the development of a policy position on IFLs, it is likely to be necessary to incorporate a degree of flexibility into implementation. Many stakeholders warned against a one-size-fits-all approach, and stakeholder feedback and other sources (e.g. Burivalova *et al.*, 2019; WWF, 2018) have emphasised the need to evaluate and adapt approaches on a case-by-case basis. The Motion 34 reports (Form International, 2020; Lentini *et al.*, 2020; Ptichnikov, undated; Williams *et al.*, 2021) provide valuable insights into the different geographical, ecological and socio-economic in four key IFL areas, but even these do not represent the full range of IFL contexts around the world. Some broad differences could be recognised, for example between the natural disturbance dynamics of boreal and tropical forests, but it might also be desirable to allow for finer scale adaptation⁵⁵.

Implementation is likely to be influenced by the outcomes of the Motion 23 pilot projects. Consideration of landscape context may well remain an important element, being consistent with FSC requirements under Criteria 6.4 and 6.5, for example, and also with common HCV guidance (Brown and Senior, 2018). It might be manifested in different ways, however, such as in clearer connectivity requirements. This is also likely to be influenced by the outcome of Motion 48/2025 “A Strategic Framework for Landscape-Level Engagement and Impact”.

It will be important to continue to allow for stakeholder engagement in both Forest Stewardship Standard setting and certificate holder management planning, explicitly including the engagement of Indigenous Peoples and local communities, and possibly with an enhanced role for FPIC processes (Fa *et al.*, 2020).

⁵³ At the time of writing, the first drafts are expected to be developed in 2026, with a public consultation on those drafts held in early 2027.

⁵⁴ At the time of writing, a conceptual consultation on the Principles and Criteria revision and a consultation on a draft of FSC-PRO-60-006 V3-0 EN *The Development and Revision of FSC Country Requirements* are expected imminently.

⁵⁵ As examples, one stakeholder has stressed the distinction between highland and lowland jungle in the Amazon, and, at the time of writing, the draft revised Forest Stewardship Standard for Australia includes specific core area thresholds for every individual IFL in the country.

7.3 Third proposal – Cross-cutting social issues

On the basis that:

- There is significant overlap between IFLs and the territories of Indigenous Peoples, and Indigenous Peoples have a vital role to play in the protection of IFLs, which in some cases only exist because of their stewardship, but the concept of intactness as the absence of human influence is at odds with Indigenous worldviews.
- Decisions about the protection of IFLs could have social and economic implications for Indigenous Peoples, traditional peoples and other local communities, while IFLs are threatened largely because of the social and economic choices of others.

The following proposal is offered for discussion:

- We acknowledge the role of Indigenous Peoples as forest stewards, and the link between tenure and management rights and their ability to exercise that stewardship.
- We acknowledge that FSC has devoted far more attention to IFLs than to alternative concepts such as Indigenous cultural landscapes.
- We acknowledge the many uncertainties around the socio-economic impacts of IFL protection, and that the rights, community needs and cultural values of Indigenous Peoples and local communities cannot be compromised.
- We acknowledge that one of the main indirect threats to IFLs is unsustainable and inequitable demand for and consumption of forest products.
- We agree to support Indigenous Peoples to secure land tenure and title to their ancestral territories, to address one of the indirect threats to IFLs.
- We agree to explore alternatives to the concept of intactness that are more culturally appropriate for Indigenous Peoples.
- We agree to research more thoroughly the potential socio-economic implications of different approaches to IFL protection for Indigenous Peoples (including those in voluntary isolation), traditional peoples and other local communities.
- We agree that IFL protections will not be considered acceptable if they compromise the fulfilment of the rights, community needs or cultural values of Indigenous Peoples (including those in voluntary isolation), traditional peoples or other forest dependent communities.
- We agree that tackling unsustainable and inequitable consumption of forest products is critical to reducing pressure on IFLs and other forests.

The following sub-sections expand on elements of this proposal.

Securing tenure for Indigenous Peoples

The unique importance of Indigenous Peoples as stewards of IFLs and other forests is recognised in published literature (Fa *et al.*, 2020) and in the input of many stakeholders to this discussion paper.

The effectiveness of Indigenous and Community Conserved Areas (ICCAs) and indigenous territories in protecting IFLs has been recognised by the IUCN (2020), while the Motion 34 report for Brazil showed that the average rate of loss of IFLs between 2000 and 2016 was lowest in protected areas and indigenous territories (Lentini *et al.*, 2020).

FSC has, of course, expressed its commitment to upholding Indigenous Peoples' existing "legal and customary rights" of ownership, use and management of land, territories and resources affected by

management activities” through Principle 3. But securing formal title for Indigenous Peoples who lack such legal recognition of their ancestral territories is a key means of addressing one of the indirect threats to IFLs (Baragwanath and Bayi, 2020; Fa *et al.*, 2020).

Pursuing this would largely be a matter of advocacy by the FSC secretariat, network partners and the Indigenous Foundation, although the potential for material support should not be overlooked. Nor should the potential role of FSC members, certificate holders, and other stakeholders and partners, which also merits consideration. As such, this part of the proposal has been included as a specific element of the draft natural forest policy presented as a starting point for discussion (see Annex D).

Culturally appropriate alternatives to intactness

Several stakeholders criticised the definition of IFLs as representing a Eurocentric or Western conception of wilderness which is alien to most Indigenous worldviews.

Baldwin and Beazley (2019) remarked on “the exclusionary ‘wilderness’ paradigm pervasive in parks and protected areas, particularly in the global north and west but increasingly exported around the world, which has thus far proven difficult to supplant despite new more inclusionary paradigms that link Indigenous and other local peoples with conservation lands”. Savilaakso *et al.* (2023) also highlighted “the dominance of Western institutions and scientific knowledge in shaping global discourses on forest conservation, often at the expense of Indigenous and local perspectives”. They expressed the view that, “Considering that Indigenous people manage or have tenure for approximately a quarter of the world’s land surface (~38 million km²) and protect 80% of global biodiversity, including 40% of the ecologically intact landscapes, inclusiveness of their views and values is overdue to be integrated when terms for different natural and near-natural forest types are defined... Inclusion of views and values of local and Indigenous communities in defining terms for different forest types acknowledges the role Indigenous and local knowledge plays in safeguarding biological and cultural diversity in many places as well as the impact people have had on terrestrial ecosystems throughout history.”

The introduction of the concept of Indigenous cultural landscapes to the International Generic Indicators in 2018 (see section 5.3) was a positive step towards considering other perspectives, but it currently has a very different status in the normative framework to IFLs, as an optional concept for standard developers to consider rather than something explicitly protected under Principle 9. It is essentially subordinate to the protections for IFLs.

The authors of the Motion 34 report for Canada noted that “The majority of the Indigenous people we spoke with were fundamentally opposed to the way IFLs were presented and implemented and have advocated for recognition of an alternate landscape level approach – adopted by FSC as Indigenous Cultural Landscape (ICL) – that is more consistent with their values” (Williams *et al.*, 2021).

Perreault and Firelight Research Inc. (2021) have provided a thoughtful reflection on Indigenous cultural landscapes in a specific context in Canada, and the way it captures a particular relationship to the land. Considering the place of the concept in the normative framework, they stated that, “If the identification of an ICL is a means to delineate cultural values on a map, then Principle 9 presents a solid framework for achieving this end. However, if the intent is to empower Indigenous Peoples as rights holders, then the value of ICLs to the community will be in looking at the broader landscape and determining the trigger points for deeper consent-based discussions in order to maintain or restore the cultural connection to lands, territories and resources.”

The Indigenous cultural landscape concept has received a lot of attention in Canada, and serious consideration should be given to the role that it can play in the FSC system, including alongside or in place of the IFL concept. Perhaps other solutions could be developed based on fuller engagement with a wide range of Indigenous perspectives. But if nothing else there must be a frank discussion as to whether it is culturally appropriate to apply a concept of intactness in all settings.

In the short term, whatever approach is taken to the protection of IFLs, all parties must commit to the engagement requirements under Principle 9 and the FPIC requirements and guidance related to affected rights holders (see section 5.3). Serious consideration should be given to the stakeholder suggestion that FSC could play a much more active role in facilitating dialogues and FPIC processes in complex settings where there is variable overlap of IFLs, Indigenous cultural landscapes and management units, rather than relying solely on certificate holders to carry out this complicated and expensive work.

In the medium term, if it is agreed that FSC should develop an IFL policy (see section 7.2), the language, intent and implementation of such a policy should reflect a wide range of cultural perspectives on conservation, and we should be open to moving away from the notion of intactness. This has informed the draft natural forest policy presented as a starting point for discussion (see Annex D), and culturally appropriate conservation management has been included as a specific element. It is crucial to the success of such a policy that stakeholders with the widest possible range of cultural perspectives are involved in its development and implementation through the FSC normative framework.

Regardless of whether a separate policy is pursued, culturally appropriate approaches to conservation should be considered during the revision of the Principles and Criteria, and again we should be open to moving away from the notion of intactness; this might affect the wording of the Principles and Criteria themselves, and/or the expectations on certificate holders implementing them. The concept of Indigenous cultural landscapes certainly merits fuller consideration and incorporation in the normative framework.

Socio-economic implications of IFL protection

Although by definition they do not contain settlements or paved roads, IFLs are not necessarily as remote as some might imagine; the full definition of IFLs on the Intact Forest Landscapes website includes a buffer of only one kilometre around settlements and infrastructure (see section 4.2), so parts may be readily accessible, even on foot, to local communities.

The global overlap between IFLs and the territories of Indigenous Peoples has already been noted (Fa *et al.*, 2020). The Motion 34 report for Canada found that 483 Indigenous communities were located within 150 km of an IFL, and conservatively estimated that the treaties and recognised lands of Indigenous Peoples covered 75% of IFLs (Williams *et al.*, 2021).

Even the remoteness of parts of IFLs does not guarantee that people do not live in them or depend on them. Indigenous Peoples in voluntary isolation are a case in point, and protecting them is the subject of Statutory Motion 10/2025.

It is very difficult to generalise about the socio-economic implications of different approaches to IFL protection given the variety of parties involved, who could range from local communities heavily dependent on logging companies and sawmills for employment and investment, to Indigenous Peoples living in voluntary isolation.

The Motion 34 reports concentrated on the economic impacts on logging companies and the potential knock-on effects, including employment, and even in this respect, as noted previously (see section 6.1), results were variable depending on the context. In the report for Canada, Williams *et al.* (2021) noted that “Economic impacts may also be felt in tourism, recreation, trapping and non-timber forest products”, and also observed that “There may also be other impacts on the quality of life in a community linked to the health of the local forest industry, but these are not in the scope of this project. We also note that the literature that was reviewed had very little to say about the social impacts of protecting IFLs.”

The following extracts from the four Motion 34 reports give a sense of the range of positive and negative socio-economic implications of the implementation of Motion 65 for different parties, as well as a sense of some of the knowledge gaps. For Brazil (Lentini *et al.*, 2020):

When addressing the M65 impacts on indigenous peoples, the interviewees recognized more benefitting aspects than disadvantaging ones. The most highlighted argument was the lower level of dispute over the use of NTFPs and other natural resources, followed by better conservation and protecting conditions of natural resources. However, there were at least three interviewees who highlighted latent impacts on the current FMUs investments in traditional communities and three cited the potential increase in illegal activity and rural conflicts, with losses of the communities' rights in case the certified FMUs drop FSC certification.

For Canada (Williams *et al.*, 2021):

Our review of the literature did not result in the identification of any studies that quantified potential economic impacts on tourism in IFLs. One of the issues with converting IFLs to protected areas is that road access is required for much forest-based tourism (although not for remote tourism), and road access in Canada is mainly developed by the forest industry.

The protection of IFLs limits the development of motorized access for hunting, fishing, hiking, berry-picking and other activities... We interviewed two recreational industry representatives from Quebec and IFL protection was viewed positively because there is a demand for activities such as canoe-camping and hiking in remote intact areas...

Based on an interview with a representative of the Fédération des Trappeurs Gestionnaires du Québec, and also based on the consultant's experience, IFLs should be perceived as beneficial to most trappers since, in Québec, most forest operations do not take traplines into account when planning harvests because the spatial scale of traplines is too small (on average about 60 km²)... Trapping in northern Canada is a strongly supported activity that is a defining cultural aspect of Indigenous people and is enjoyed by many non-Indigenous people.

For the Congo Basin (Form International, 2020):

Insufficient data are available to calculate the actual magnitude of the socio-economic impact on local, forest dependent communities. However,... the main impact will be a reduction of employment; as much as 15% in case of application of the 50% IFL protection threshold. Indirectly there will be an impact on social projects such as workers' accommodation, supply of drinking water and electricity, food security, health care, education facilities, funds for community development and the local development fund in Gabon and the Republic of Congo.

For Russia (Ptichnikov, undated):

There is a mix impact of returns and costs of M65 implementation for different stakeholder groups in Russia. In the places, where local population is significantly engaged in forest management (FM), implementation of M65 may have negative impact on jobs, level of wages, social services. In places, where local population is not engaged in FM works, protection of part of IFLs has moderate positive

impacts on well-being of people due to conservation of part of their traditional lands. Indigenous people are the most vulnerable group, they often have traditional hunting and fishing areas in IFL and they mostly welcome M65 approach.

Socio-economic impacts, including downstream impacts on supply chains, have been part of the argument against approaches to IFL protection that restrict access for timber harvesting. However, there seems to be little hard evidence to quantify impacts (and the testimony of logging companies is dismissed by some stakeholders), and such evidence as there is shows that impacts vary for different parties in different contexts.

Consideration of socio-economic impacts is completely in keeping with FSC's general commitment to socially beneficial forest management and the specific commitments under Principles 3 and 4, and must inform ongoing discussions about IFL protections, but our evidence base appears to be limited; hence the proposal to research these impacts more thoroughly.

While there is clearly a need to learn more, and no doubt much will depend on context, a general consideration of rights, community needs and cultural values has been included as a specific element of the draft natural forest policy presented as a starting point for discussion (see Annex D).

Unsustainable and inequitable consumption

Finally, it seems futile to discuss protections for IFLs without addressing one of the most important underlying reasons for the threats they face: unsustainable and inequitable consumption.

Consumption was recognised as a root cause of threatening activities in the original work on frontier forests by Bryant *et al.* (1997), and the situation has only worsened in the intervening years (Kan *et al.*, 2023; Kashmanian, 2020).

Several stakeholders have identified a need to move beyond a model of forest management based primarily on international trade in timber. This would be consistent with the Principles and Criteria, which require certificate holders to act to “strengthen and diversify the local economy” (Criterion 5.1), “use local processing, local services, and local value adding” (Criterion 5.4), and contribute to the “social and economic development” of local communities (Criterion 4.4). Greater moves towards diversified local markets might help to avoid some of the potential negative socio-economic impacts of IFL protection. But of course global demand for timber – especially from countries which have long since destroyed anything resembling Intact Forest Landscapes – remains high.

How far FSC can really influence global supply chains – and how far this can be done without collapsing FSC's current model of certification – remains to be seen. Tentative steps have been taken. The first draft of the *FSC Climate and Biodiversity Strategic Framework 2026-2032* made passing references to reducing consumption but no real commitments. Specific steps have been taken regarding circularity⁵⁶.

There are no easy solutions, but at the very least a recognition of this issue must underlie and inform everything we do to protect IFLs. On this basis, wording on reduced and more equitable consumption of forest products and greater circularity in supply chains has been included as a specific element of the draft natural forest policy presented as a starting point for discussion (see Annex D).

⁵⁶ See <https://fsc.org/en/circularity>, accessed 5 September 2025.

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Annex A – Motion 65/2014

Title: **High Conservation Value 2 (HCV2) – Intact forest landscapes (IFL) protection.**

Policy Motion (high-level action request):

To ensure the implementation of Principle 9 and the protection of Intact Forest Landscapes - the world's remaining large undisturbed forest areas contained in HCV2 - across FSC certified operations, FSC will direct Standard Development Groups (SDGs) and Certification Bodies (CBs), where no SDG exists, to develop, modify, or strengthen (according to standards revision processes) indicators within National Standards and CB standards that aim to protect the vast majorities of IFLs. Taking into account scale, intensity and risk as well as respecting the activities, customary and legal rights of traditional forest communities, this process will:

- 1) Be based on best available, independent, peer-reviewed science and other information;
- 2) Take into consideration IFL degradation in FSC FMUs since 2000;
- 3) Respect Free Prior and Informed Consent of indigenous Peoples, traditional peoples and forest dependent communities in affected FMUs;
- 4) Within IFL **cores** ensure that Certificate Holders implement protection measures (for example, set-asides, legal protected areas, conservation reserves, deferrals, community reserves, indigenous protected areas etc.) ensuring management for intactness, in areas within their control;
- 5) Require a comparative assessment of the viability and effectiveness of alternative land use options, in maintaining and enhancing intactness of IFLs including in areas outside FSC FMUs (landscape level);
- 6) In limited circumstances, allow limited development of IFL cores if such operations produce clear, substantial, additional, long-term conservation and social benefits;
- 7) Where applicable, address the need to reduce timber harvesting rates to reflect any reduction in the timber volume due to removal of IFL areas from harvesting;
- 8) Prioritize development of low-impact/small scale forest management, non-timber forest products in unallocated IFL areas, and provide first access to local communities an taking into consideration section iii;
- 9) Promote alternative models for forest management/conservation (for example, ecosystem services etc.) within the IFLs,

If by the end of 2016 a relevant standard has not been implemented, a default indicator will apply that mandates the full protection of a core area of each IFL within the management unit. *For this purpose, the core area of the IFL will be defined as an area of forest comprising at least 80% of the intact forest landscape falling within the FMU*

Annex B – Motion 23/2020

Use landscape-wide approaches adapted to local conditions and strengthen Standard Development Groups (SDGs) to improve protection of Intact Forest Landscapes

Policy Motion (Motion text /high-level action request):

In order to overcome the deficiencies of Forest Stewardship Council's (FSC's) current approach to High Conservation Value 2 (HCV2) and Intact Forest Landscape (IFL) conservation and to deliver to the expectations of constituents and members, **the FSC shall review and revise the current approach to achieving effective IFL conservation; and enable and guide SDGs[1] to identify and recommend improvements to FSC's normative frameworks (especially the International Generic Indicators (IGIs)[2], including Annex H), to strengthen approaches for identification, protection, maintenance and/or enhancement of HCV2s, including IFL conservation at landscape level in National / Regional Standards.**

FSC's current approach shall be reviewed and revised to:

- support the intent of the FSC Principles & Criteria, especially Principle 9, and motions duly adopted by previous FSC General Assemblies (GAs) (i.e. Motion 65/2014, Motion 34/2017; Motion 71/2017); and address effective protection of the vast majority of HCV2s/IFLs at the level of the landscape; and
- be able to change current requirements at international level for placement and extent of IFL core areas and conservation measures (including thresholds for strict IFL conservation related to FSC certified Forest Management Units (FMUs)), and to hereby achieve best possible contribution to conservation of HCV2/IFL across the entire landscape within the specific environmental, social and socio-economic conditions in the landscape; and
- include in the identification, conservation and maintenance of HCV2s / IFLs (including core areas) within the landscape, best available information; the results of regional assessments (Motion 34/2017); expert knowledge and peer review (e.g. HCV Network[3]; Tropenbos[4]; WWF[5]; FORLAND[6]; STARLING[7]; WRI[8]; Global Forest Watch[9]); on-the-ground (below-the-canopy) analyses of ecological, social and socio-economic values and conditions including different degrees of intactness in terms of natural disturbances, forest types, human interventions, fragmentation and/or biodiversity values; and
- include risk analyses in the identification, prioritization and balancing of conservation and management measures for HCV2/IFLs protection at landscape level; by assessing risks & benefits as well as threats & opportunities related to biodiversity, forest carbon stocks, Indigenous Peoples and local communities, the FSC brand, certified operations, and other HCV2/IFL related values; and
- strengthen, clarify the role of, and rely on SDGs in adapting FSC's international approach and operationalizing requirements for HCV2/IFL conservation at landscape level within specific environmental, social and socio-economic conditions at local, national and/or regional level; and
- utilize consultation with Indigenous and Traditional Peoples who may rely upon or be affected by IFL conservation, and uphold their rights, including their right to Free Prior Informed Consent (FPIC) and following FPIC procedures wherever applicable; and
- be consensus based and equitably engage with all relevant stakeholders at national/regional level, especially local communities, and stakeholders who may rely upon or be affected by IFL conservation as well as governmental agencies where appropriate (e.g. as forest owner, as landscape planning authority, etc.).

While this review/revision process is ongoing and until a comprehensive global approach has been developed and agreed, **an interim rule shall apply.**

This interim rule shall enable approval of proposals duly adopted by national/regional SDGs temporarily requiring thresholds for strict IFL conservation within the FMU of less than the majority of the IFL.

FSC shall develop an advice note indicating criteria to apply this interim rule and present it to the Board of Directors for approval by 28 February 2023.

The FSC shall implement this motion with highest priority within 1 year.

The FSC Board of Directors and Secretariat shall formulate implementation guidance immediately after the FSC GA 2022, but not later than 31.3.2023, and include relevant aspects which are developed and agreed after the deadline for amending this motion.

[1] SDGs: national and/or supra-national (regional) Standard Development Groups

[2] FSC-STD-60-004 V2-0 EN - International Generic Indicators

[3] <https://www.hcvnetwork.org/>

[4] <https://www.tropenbos.org/>

[5] <https://wwf.panda.org/>

[6] <https://forland.io/>

[7] <https://www.starling-verification.com/>

[8] <https://www.wri.org/>

[9] <https://www.globalforestwatch.org/>

Background / rationale:

The proposers, seconders and supporters of this motion to the General Assembly (GA) of the Forest Stewardship Council (FSC) fully support the conservation of High Conservation Values 2 (HCV2s) including Intact Forest Landscapes (IFLs) and are prepared to contribute to the best of their ability. Through this motion they want to address their concerns that the approach to HCV2/IFL conservation currently taken by FSC is deficient.

It neither enables FSC constituents to contribute to the best of their ability nor is it making substantial advances in HCV2/IFL conservation by focusing exclusively on the rather limited portion of IFLs in FSC certified Forest Management Units (FMUs). The intent of the motion is to enable and advance HCV2/IFL conservation, and to change FSC's current course of action. FSC-certified operations want to be part of the solution to achieve the best possible contribution to conservation of HCV2/IFL across the entire landscape, without compromising FSC's statutory commitment to environmentally appropriate, socially beneficial and economically viable (responsible) forest management.

Need for this motion

Much of the information learned during the past 8 years is not or only partially reflected in FSC's current approach to integrating IFL conservation into the HCV2 concept. Identification of IFLs is mainly based on globally applicable remote-sensing techniques. Dr. Potapov - one of the recognized experts who was involved in developing the IFL identification mainly used by FSC, stated clearly, that "... our results are generally not immediately suitable for local-scale conservation planning, as our globally consistent criteria may be in conflict with locally used criteria and locally known disturbances may have been overlooked" (Potapov et al., 2008[1]).

IFLs are classified based on canopy disturbance (fragmentation) identifiable on satellite imagery as either "existing" or "not existing", which seems to be de-facto an undue simplification of reality. In reality, forests exhibit varying degrees of "Intactness", ranging from 0 to 100% in terms of human intervention as well as fragmentation and biodiversity levels. Recovery from natural and human made disturbance and "Intactness" of forests in terms of biodiversity are not considered comprehensively in FSC's approach to HCV2/IFL conservation.

IFL mapping used by FSC was developed as an instrument for wide-scale ecosystem conservation planning – not for management planning at FMU level. It considers disturbances within FSC-certified FMUs without comprehensively considering whether and how forest management caused disturbances and whether disturbances are temporary and recover; and how they impact "Intactness" of forest landscapes.

FSC's current approach is focused on threats related to forest canopy disturbance at FMU level but not including other threats to intactness of forests in terms of biodiversity, carbon stocks and/or other ecosystem values; and completely fails to consider economic and social benefits and opportunities for ICL maintenance arising from forest management. Threats and opportunities for HCV2/IFL conservation outside the FMU are not at all reflected.

The studies prepared as requested by Motion 34/2017 on social, environmental and economic impacts of FSC's approach to IFL conservation within HCV2 are not reflected in FSC's current approach. The reports show that, in the regions studied, only 0.6 to 7% of existing IFLs are addressed through the FSC approach focusing on certified FMUs; and even for this rather small portion, affected FMUs have mostly expressed that they cannot maintain their commitment to FSC, if the current course is continued.

The development of comprehensive IFL conservation within HCV2 has been ongoing since 2014 (i.e. 8 years), but the outcomes and approaches currently applied are still not delivering to the expectations of FSC constituents and members. Discussions are continuing and 5 motions have been proposed to the FSC GA 2022 to change and improve the present course of action.

Therefore, this Motion 23 is needed to change FSC's current approach to effectively implement HCV2/IFL conservation.

FSC Statutes

The FSC Statutes stipulate in article 5 *"The purpose of the Organization [FSC] shall be the following: (1) To promote the responsible management of forests, by providing the assistance required to achieve an environmentally appropriate, socially beneficial and economically viable use of natural resources and provision of ecosystem services, to avoid deterioration or misuse of such resources, or of the ecosystems or surrounding communities. (2) To promote viable management of forest resources and a forestry*

production that preserves the environment and respects civil rights and the rights of indigenous peoples, traditional peoples and local communities”.

It must be concluded that the FSC’s approach to HCV2/IFL conservation is not only technically deficient (as outlined above), but fails to deliver to FSC’s purpose. The exclusive focus on some select environmental aspects of IFLs may be ‘environmentally appropriate’ but it is questionable that it is ‘socially beneficial’, let alone ‘economically viable’. The current approach does not provide “... assistance required to achieve an environmentally appropriate, socially beneficial and economically viable use of natural resources...” and it does not “... avoid deterioration or misuse of such resources ...”.

Objective of this motions

The objective of the motion is to further develop FSC’s current norms and systems for IFL conservation within HCV2 at FMU level into an approach which:

- addresses IFL conservation at landscape level with the FMUs being an integral part of the wider landscape;
- complements identification of IFLs and associated conservation measures with ground-based (below the canopy) environmental, social and socio-economic surveys and impact analyses;
- comprehensively uses best available information and expert knowledge (e.g. HCV Network; Tropenbos; WWF; FORLAND; STARLING; WRI; Global Forest Watch); and identification of overall protection status and conservation priorities through comprehensive review and research;
- takes into account risks & benefits as well as threats and opportunities to HCV2/IFL conservation;
- strengthens and relies upon national/regional SDGs to operationalize requirements for IFLs conservation at landscape level;
- bases on consensus and equitable engages with all relevant stakeholders at national/regional level;
- enables FSC-certified operations to contribute to the best of their abilities to HCV2/IFL conservation rather than compromising and excluding them;

Landscape approach

In FSC’s current approach, maintenance of IFL is only addressed through a small sub-set of FMUs, which voluntarily commit to FSC standards and certification, but not in the context of the adjacent, much less the wider landscape.

This Landscape Approach shall consider all HCVs within the broader social, environmental and economic context in the landscape, not only the portion which is located in FSC-certified FMUs. This approach shall be integrated with land-use and conservation planning as well as conservation efforts in the wider landscape so that efforts are directed to places where they are most relevant (e.g. where IFLs and/or ICLs exist), most needed (e.g. where biggest threats exist) and most effective (e.g. where measures can maintain viable sets of HCVs at significant scale).

The FSC’s Focus Forests Initiative aims to formulate FSC’s approach to forests with special environmental and social value. It has great potential to contribute to understanding landscape approaches and IFLs in the wider setting of forests with special value, , including:

- development and testing of methodologies for improved stakeholder dialogue to confirm legitimacy of proposals or decisions made,
- development and testing of ideas for how features in the wider landscape can be considered in decisions for how IFLs should be managed inside FSC certified FMUs.
- Identification of the biodiversity and social values of the IFL based on field and historical data obtained below the canopy.

IFL identification and mapping

FSC's current approach needs to be complemented with ground truthing, and on-the-ground (below-the-canopy) analyses of ecological and social values. This is especially true and relevant for the identification and maintenance of Indigenous Peoples Cultural Landscapes (IPCLs or ICLs). Identification of IFLs should be expanded from one being based on current canopy disturbance only, to equitably incorporating historical and current human and nature interactions, which shaped forest landscapes, conform with ICLs, and consider existing environmental, social and socio-economic conditions, as well as (local, national and regional) development aspects related to HCV2 conservation and maintenance.

In addition, the precautionary approach needs to be considered. In some regions, reduced logging has led to conversion of natural forests to forest plantations or alternative land-uses. Safeguards must be considered to prevent these and other unintended consequences.

Engagement with interested and/or affected stakeholders at landscape level

It is essential that all relevant and/or affected constituents and stakeholders are equitably engaged in developing consensus based, landscape-wide approaches to comprehensive HCV2/IFL conservation. This must especially include traditional communities, Indigenous Peoples, local communities and stakeholders who may rely upon or be affected by IFL conservation. Free Prior Informed Consent (FPIC) is central to developing fair, equitable and acceptable solutions to comprehensive HCV2/IFL conservation.

Around the world, forest lands are often owned and managed by governmental agencies, and many governments are responsible for land-use and landscape planning. It is essential for FSC's contribution to landscape-wide HCV2 conservation that local / national governments and authorities (e.g. as forest owner, as landscape planning authority, etc.) are engaged, and that their expectations are considered and accommodated.

Comprehensive engagement with relevant and/or affected stakeholders of the landscape is critical of identification of IPCLs and IFLs; and related core areas and management measure. Related processes must safeguard that concerns, aspirations, expectations, needs, rights, opportunities and benefits, risks and threats are duly considered in the establishment, implementation, and monitoring of IFL conservation not only within the FMU, but at landscape level.

Flexibility in FSC's current approach

It is obvious that forests as well as environmental, social and economic values, aspects and conditions vary widely around the world.

In some globally important regions (e.g. Russia, Canada) FSC's current approach was translated by SDGs into operational requirements for FSC-certified FMUs which enable viable forest management and contribution to comprehensive HCV2/IFL conservation in the spirit of the FSC Statutes.

These experiences clearly show the important role of SDGs in adapting FSCs global strategies into operational approaches actionable in the local/national/regional context. Furthermore, these successful examples are an indication for the importance of reflecting local/national/regional environmental, social and environmental conditions; and using best available knowledge.

In contrast, experience in other regions (e.g. Amazon Basin, Congo Basin) shows that FSC's current approach, in spite of best effort, did not lead to viable operational solutions enabling effective contribution to HCV2/IFL conservation. Some of the requirements included in FSC's current approach seem to be directly compromising economic viability of forest management (and indirectly associated social benefits and environmental appropriateness) contrary to the spirit of the FSC Statutes.

In particular, within FSC's current approach the global requirements for placement and extent of IFL core areas and the thresholds for strict conservation seem to be making economic viability of forest management impossible and blocking progress. These experiences clearly show that the approach FSC is currently taking does not lead to promoting and assisting responsible forest management world-wide, but only that it works in some regions and not in other situations.

Recognizing and appreciating that environmental NGOs in an effort to overcome blockages due to FSC's deficient approach proposed that *"the proportion of IFL conservation required for the management units may be able to decrease (below 50%) if the proportion of full IFL protection increases in the landscape(s) containing the management unit."* it seems obvious that current challenges are not the result of a lack of willingness among stakeholders and constituent to collaborate and find agreeable solutions to enable best position contribution to HCV2/IFL conservation, but an outcome of FSC's current course of action.

With great appreciation it is recognized that Motion 23 has been developed in collaboration with social, environmental and economic members of FSC, proposing an inclusive process to change FSC's approach to implementing HCV2/IFL conservation without asking for or pre-empting particular outcomes of this process.

The proposer, seconders of Motion 23, on behalf of the many social, environmental and economic members of FSC who contributed to Motion 23, ask the FSC members for their support.

[1] Potapov, P., A. Yaroshenko, S. Turubanova, M. Dubinin, L. Laestadius, C. Thies, D. Aksenov, A. Egorov, Y. Yesipova, I. Glushkov, M. Karpachevskiy, A. Kostikova, A. Manisha, E. Tsybikova, and I. Zhuravleva. 2008. Mapping the world's intact forest landscapes by remote sensing. *Ecology and Society* 13(2): 51.

[online] URL: <http://www.ecologyandsociety.org/vol13/iss2/art51/>

Annex C – Extended summary of stakeholder input

This extended summary of stakeholder input is the basis for the shorter summary in section 6.1. Note that the views expressed were diverse, and it would not be possible to present them all in detail without this summary becoming extremely long and unwieldy. As such, only a proportion of stakeholder comments have been highlighted, some similar comments have been combined, and almost all have been paraphrased.

Overall attitudes to IFLs

Stakeholders were asked to express, in simple terms, why Intact Forest Landscapes mattered to them. Most stakeholders reflected on specific values associated with IFLs (see the next sub-section), but the following points give a sense of the range of other views on why IFLs matter:

- They don't! They are an artificial construct that met the goals of the environmental chamber (particularly Greenpeace) at the time, but which largely ignored the role of Indigenous Peoples.
- IFLs matter because the FSC membership has (rightly or wrongly) voted in the concept.
- IFLs in themselves are of great value, but what matters is FSC's approach to them. There is potential for FSC to fail because of a "romantic" approach to IFLs, and for everything it stands for to be lost without having any positive impact on IFLs.
- IFLs have become interesting as a textbook example of how humans fail to agree on environmental issues, and how science is trapped in discussions which don't relate to scientific problems.
- It is important to accept that we don't know everything, and it is good to have something out there which is not overly managed.
- IFLs are a subset of primary forest, in many cases the best of what is left following human impacts. They are hotspots of conservation values.
- If we lose IFLs, we lose the fight against climate change.
- Imagine them as the Earth's intact lungs, essential for our survival.
- IFLs matter not as hundreds of millions of hectares of forests not yet put into production, and primarily valued for their timber, but because of their actual contribution to people, which is often undervalued and/or taken for granted.

Values and threats

Stakeholders were also invited to reflect specifically on the values associated with IFLs, how they compared with other conservation values, and any changes or trends that threatened them.

Feedback on values was generally aligned with the reasons given in published literature for identifying and protecting IFLs (see section 4.3). Many stakeholders mentioned biodiversity and climate change mitigation, as well as water, soil, air or ecosystem services in general. Some referred to intactness as a value in itself, or pointed to characteristics of IFLs such as size and habitat features. Some noted that IFLs could contain all of the categories of High Conservation Value recognised by FSC, and one referred to IFLs as a sort of super-HCV. There were a few references to social values such as visual amenity, and one stakeholder explicitly mentioned economic values. Others noted the value of IFLs for the subsistence and culture of Indigenous Peoples, with some referring to Indigenous cultural landscapes.

Other notable points on the values associated with IFLs included the following:

- While even the oldest papers on IFLs describe their value (see section 4.3), they do not mention that, if the areas were logged and well managed, they might lose their status as IFLs but they might still store carbon and harbour biodiversity. These forests have these values because they are large, not because they are IFLs.
- All benefits from natural resources are important, not just those from IFLs, especially in the context of climate change; society should protect all of these values in the same way.
- It is important to look at all HCVs and to prioritise areas with multiple HCVs for conservation.
- While there is value in honouring the fact that there are places left where wildlife can live in peace, such wildlife areas cause problems for Indigenous Peoples. And while there might be concentrations of HCVs in IFLs because of their intactness, areas of HCV 5 (community needs) and HCV 6 (cultural values) are often overlooked.

Feedback on direct and indirect threats to IFLs was also similar to that in published sources (see section 4.4). Some of the most commonly mentioned threats were logging (legal and/or illegal, depending on the country context), oil and gas exploitation, infrastructure, agriculture/land use change, mining, urbanisation, climate change, fires and invasive species. Some aspects of forest governance were noted, such as changes in the status of protected lands, IFLs not being recognised as a category of forest deserving special protection, and priorities for concessions being revenue generation, with protected areas already in national park systems. Other threats mentioned included armed conflict, fuelwood consumption and changes in the lifestyle of Indigenous Peoples, for example in response to growing markets for bush meat. One stakeholder suggested that the current narrow view of economics based on timber and international trade was a threat, and that greater consideration of local and national economic values, and not just subsistence values, would change the viability of different approaches to management.

One stakeholder referred to treaty negotiations in Canada and identified lack of reconciliation of traditional tenures as a threat to IFLs, because it indicated disrespect to Indigenous Peoples but also undermined sound governance. Another stakeholder noted that a tension between protected areas and the rights of Indigenous Peoples was built into FSC's approach to IFLs; the legal managers were told these were special areas which needed protection and from which people must be excluded. They suggested that the exclusion of Indigenous and traditional rights holders was one of the changes/threats which had to be addressed, and that FSC was perfectly positioned to rethink the development of co-management strategies, having put the FPIC framework in place.

Finally, one stakeholder pointed to challenges presented by the rigidity of FSC's own rules, for example if a new public road split an IFL, triggering changes in the application of rules in the resulting smaller areas. They observed that FSC always reacted to difficulties presented by rules with more rules, and that we must be more creative.

Definitions

Stakeholders were asked whether the IFL definition used by FSC was fit for purpose. While many of the responses were nuanced and not easily categorised as yes or no, overall the feedback was roughly evenly split.

Among the feedback from stakeholders who felt that the definition was largely fit for purpose, the following points are of note:

- The question is naïve; any other definition would not be an IFL.
- The definition would benefit from refinement, interpretation and/or ground truthing, particularly regarding intactness, the role of Indigenous Peoples and landscapes prone to fire.
- Implementation issues are the result of FSC using a truncated version of the IFL definition (see section 5.3). If the IFL concept is retained FSC should not change or truncate the definition but clarify its application.
- The definition could be adapted to make clearer reference to the state of the forest, its structure and dynamics, as in the IUCN definition of primary forest (IUCN, 2020). A definition based only on extent and disturbance tends to encourage efforts to negotiate down what is considered IFL.
- Definitions in published papers are more explicit about human impacts and timeframes (see section 4.1). Consideration of the time element might allow for IFL restoration.
- IFLs could lead to a loss of focus on other instances of HCV 2.

Among the feedback from stakeholders who questioned whether the definition was fit for purpose, the following points are of note:

- The binary distinction between intact and not intact is too simplistic and unrealistic; this binary approach is fundamentally flawed and is causing system failure within FSC. Some stakeholders view the definition as only operating in one direction, but this disregards the resilience of forests and their ability to recover alone or aided by restoration efforts.
- The definition is too rigid/prescriptive. There is a need to take account of regional, national or landscape contexts, including differences in disturbance patterns and flagship species ranges between boreal and tropical forests.
- The definition reduces a very complicated topic down to a GIS solution.
- IFLs seem to have taken priority at the risk of diverting attention from other areas which don't meet the definition. This concept has been adopted by FSC without adaptation, in a very prescriptive way and not focussed on outcomes; Principle 9 is otherwise not so prescriptive.
- The definition assumes that forest is better without modern management. FSC's mission is to promote responsible forest management, but the IFL definition effectively keeps forestry out of the forest.
- The definition is unclear; FSC members in Latin America had understood the description of IFLs as equivalent to reduced impact logging and had accepted Motion 65 on that basis.
- The definition is very Eurocentric, and fails to account for the role of Indigenous Peoples. There is a disparity in how FSC treats IFLs and Indigenous cultural landscapes, even though they overlap and it is because of Indigenous cultural landscapes that IFLs exist.
- Healthy Forest Landscapes might be more appropriate, allowing room for positive management.
- While FSC perhaps cannot change the IFL definition unilaterally, we should participate in updating the HCV approach via the HCV Network.

FSC's current approach to the management and protection of IFLs

It must be acknowledged that the majority of the feedback on FSC's current approach to IFLs was negative. There was positive feedback on the Motion 23 pilot process as an important part of the ongoing discussion around IFLs and a good step towards finding landscape level solutions. Even those dubious about the merits of the pilots recognised that they must be allowed to run their course. Other positive feedback included:

- FSC's initial response to identify IFLs as a standalone part of HCV 2 was excellent; Motion 65 was ground-breaking.
- The FSC approach has been good compared to situations where nothing is done.
- FSC introduces standards aimed at ensuring more responsible forest management, which is crucial for ecosystems as valuable as IFLs.
- The standards are well structured, covering the social, technical and official regulations.
- A lot of good elements are in place, including Annex H in the IGLs; the thinking behind establishing core area thresholds is probably still quite good. Also the guidance document for forest managers on IFLs.
- It is good that attention has been focused on the value of intactness and how to manage our impact on the integrity of intactness. It has forced us to examine the concept of sphere of influence.
- Motion 23 has tried to convene all stakeholders, rather than just using an outdated remote sensing approach.
- FSC certified concessionaires in central Africa are doing a much better job than in other parts of the world. There is evidence of positive biodiversity impacts, regardless of whether forests are "intact".

Several stakeholders said it was good that the issue was being discussed, but this also led into one of the strands of criticism:

- It is good that there is a certification scheme having this discussion, but a lot is going on, and it does not seem very coordinated. It has been a long journey. Motion 65 came in 2014, then in 2017 there was discussion about the limits of the approach, then Motion 23 in 2022, followed by a long process with uncertain outcomes.
- What is good is that the issue is still being discussed, which shows the commitment of parties. But this is also a weakness. How can this community need more than ten years to agree how to manage one aspect of forest? There is something highly dysfunctional in the governance process. There is plenty of data, but a lack of common understanding and clarity. There are too many issues, tensions and agendas. Motion 65 trapped people. There are three pitfalls in decision making: lack of agreement (which is the issue here), maybe not everyone understood the implications of agreement (which is also the case with Motion 65), and maybe people missed something that is coming (e.g. papers showing that FSC is still bad for IFLs).
- This conversation has been going on for ten years; why is it such a nightmare finding a solution?

Some stakeholders neatly encapsulated positive and negative aspects in their comments:

- What's good is that there is humility in recognising that FSC hasn't yet figured this out. There is a lot of activity and learning going on. But the biggest obstacle is that it is all related to the high cost of low trust. FSC is better than most at getting some trust, by building relationships etc., but there are some signs that this is weakening.

- FSC is a market-based initiative, and there are very limited IFL areas in FSC certified operations. The strict IFL rules for certificate holders resulted in challenges for the business case of FSC certified companies. It is good FSC has analysed these consequences, took some measures to keep these certificate holders within the system and now looks for other ways to both accommodate the business case of certificate holders while also attempting to have more impact in IFLs outside certified areas.

Much of the negative feedback focussed on the requirements which undermined the economic case for FSC certification, for example:

- FSC's actions, no matter how well-intentioned, could become counterproductive if the requirements or restrictions it imposes were to severely compromise the economic viability of certified industrial logging. If FSC certification makes logging too costly or too restrictive to be profitable, companies might be tempted to:
 - Abandon FSC certification: They would then opt for uncertified practices, potentially less sustainable and less respectful of IFLs.
 - Withdraw from the area: This could create a void, allowing illegal or unregulated logging, which is often far more destructive to IFLs.
 - Turn to alternative activities: Forest lands might be converted to other more profitable short-term uses, such as intensive agriculture or mining, leading to irreversible IFL loss.

Specific issues with core area thresholds were raised, as were the realities faced by concessionaires, for example:

- Management is done through the precautionary principle of the 80-20 percentage. This is causing the loss of certificates in Canada.
- The main challenge with the implementation of IFL requirements in the Congo Basin is the fact that the governments do not agree with the concept. Management units in the Congo Basin are owned by the states and leased out to logging companies. The governments argue that including more protection areas in the management units that have been classified as production areas will render the activity economically unviable. They argue that state land management plans have put aside enough protected areas to ensure biodiversity and that other HCVs are maintained. Reduction in production area to them means reduced taxes and reduced royalties to be paid by the companies, which will cause a huge financial gap and prevent the execution of planned development projects. For the certificate holders, implementing this IFL rule against government approval means that the company must continue to pay taxes and royalties over the IFL areas they have set aside to comply with FSC requirements.
- Immediately following the approval of the Greenpeace Motion on IFLs at the General Assembly in Sevilla in 2014, it was apparent that there would be difficulty in implementing the Potapov definition of IFLs in government-issued timber logging concessions over State-controlled lands in Canada, Brazil and Congo Basin. The licences require the logging of a prescribed annual cut, boundary to boundary, with some conservation or topographic exclusions. The business plans are developed accordingly. Retracting large areas for IFLs makes planned logging financially unattractive. Attempts to separate core/non-core areas and devising various percentage areas make little or no impression on this basic conflict.

One stakeholder noted that FSC had been used as a practical tool for forest/IFL protection in Russia, but this trend might be changing not because FSC requirements are weak, but because they are strict;

companies see IFL requirements as a burden and don't see opportunities to continue to work with FSC. However, the same stakeholder also noted that:

- The approach to IFLs is not fully correct. There is a strictly protected core area required by FSC, but in the surrounding buffer area, which is still part of the IFL, companies do what they want, without thinking of connectivity etc. This island approach could be improved.

Other stakeholders were more scathing about the failures to protect IFLs:

- FSC continues to expand the allowable amount of IFLs that can be logged within a concession. The original motion set an 80% threshold; a large proportion was supposed to be protected. That has now been degraded to 50% or even lower. Some standard developers want to go down to 20%. At some point there will be no IFLs because everywhere will have been logged. A finance mechanism is missing. It seems like FSC's only tool is logging, despite other ecosystem services. FSC is failing, and also failing to attract new concession holders because of restrictions, so is now in an intractable situation.
- FSC has drifted into trying to appease specific interests, without proper consideration of science or policy. The approach is not grounded in values, but in location and opinions. The challenge seems to be in establishing what values are present, what forest integrity is, and a baseline for values, along with relevant insights into how to manage any proposed production activities to maintain values and avoid fragmentation. It is rather assumed that production must happen, as IFLs will be lost anyway. In which case, it could be argued that FSC is not really managing IFLs, it is simply asking certificate holders to meet the existing standard requirements, which include those for HCVs. Are companies adequately identifying, maintaining, enhancing, monitoring and reporting on the state of HCVs? No. Irrespective of whether this is called IFL or not, companies will need to invest more in the maintenance of values in forests designated as IFLs, if FSC is to remain credible in their inclusion under its certified forest management. All this needs to be substantiated with publicly available data.
- That Motion 65 was put forward in the first place reflected just how badly FSC had been managing large landscape scale forests (HCV 2). This is because somehow business as usual was seen as being a suitable way to protect them. Justifications varied around the world but even where these forests contained large concentrations of HCV 1 little adaptation of management was undertaken. From the outset due to industry demands a thresholding approach was adopted, first at 80% then subsequently down to 50%. This was still not enough for the logging companies who have made zero genuine effort to meet the thresholds, so not adjusting cutting strategies just cutting as if they had access to 90% of the forests. Motion 23 represented another attempt to weaken FSC provisions. I am not optimistic it will deliver either an outcome for IFLs or the loggers. However it needs to run its course and then be evaluated.

There was some more generic criticism of the processes involved:

- FSC adopted a completely untested approach. We need to monitor whether the approach does what it is supposed to. Rules come in untested, and then problems arise, so then there are interpretations, advice notes etc. (also untested) to fill the gap until a solution can be found. All of this coming out of General Assembly motions.
- When it comes to devising procedures, FSC is taking the same, complicated recipe without regional/national/ecosystem flexibility. There is no efficient process for applying tools, and every year that goes by we lose ground. Failure to recognise that urgency is what matters. We won't get a perfect solution, but maybe we can get something we can review and revise every few years, as is required by Criterion 9.4, for example.

Finally, one stakeholder stated bluntly that:

- Motion 65 and everything afterwards has had no positive impact on IFLs, no tangible social or environmental benefits, and there won't be any if we stick to the threshold approach. FSC will lose its place to PEFC, and thus lose influence.

Ideal certification solutions for IFLs

The Board mandate for this discussion explicitly recognised the need to consider FSC's overall role in relation to IFLs, including "beyond the instrument of certification". Stakeholders were first asked to concentrate on certification solutions, although their answers tended to include some of the non-certification approaches covered in the sub-sections below; these have been separated out as far as possible.

Stakeholders were asked to describe an ideal certification solution for IFLs. Responses varied widely, although a notable number focussed on better implementation of HCV requirements rather than applying specific requirements for IFLs. Given how important these responses might be to finding a way forward for IFLs in the FSC system, they are presented here at greater length than for other questions, although this is still only a summary which does not include all of the feedback received:

- There is no ideal solution for IFLs. Each jurisdiction, forest type and forest management system would require a regionally-based solution to the management of intactness (not IFLs!). Motion 23 is an attempt to find regional solutions in four countries/regions, but even if we find solutions workable in these locations, the approaches might not work in other countries.
- FSC is taking the right steps to answer this question with Motion 23 pilots. More attention will be needed to look at Indigenous cultural landscapes and to learn from Indigenous ways of managing forests.
- An ideal solution would be Indigenous-led, starting with a rights-based approach, and come from the bottom up, defined through a participatory mapping and FPIC process. There would need to be some coordinated financial support for certificate holders. Put the power of defining management prescriptions in the hands of rights holders, so areas can be certified as Indigenous managed or have co-management agreements. There could be best practice Indigenous management areas, and only where there were no overlapping access or use rights would the owner be able to manage on their own.
- Drop the IFL concept. Principle 9 is sufficient to protect HCVs, and there was no need to add anything more. FSC should have focussed on doing a better job with HCV standards.
- Treat IFLs like any other HCVs, rather than giving them exceptional priority as at present. Approaches should be more adapted to local conditions, for example distinguishing between low intensity harvesting in tropical forest and clearcutting of boreal forest.
- Ensure robust, transparent implementation of HCV requirements, potentially including, in highly significant forest countries/ecosystems, FSC-endorsed HCV assessments that apply to all certificate holders.
- Ensure outcome-oriented monitoring and outcome-based adaptive management, and sustain the values for which IFLs are identified.
- Base FSC certification on outcome-oriented standards, not practices-based standards.
- Include the concept of fragmentation as just another issue to be considered and balanced against others. It is healthier to address this as just one more dimension rather than trying to make it a big overarching issue.

- Change audits to focus on themes, rather than indicators and checklists, then dig down when concerns arise. We should recognise good performance and be able to answer big questions. Hopefully the Digital Audit Report will help with this.
- Require a better than business as usual solution, regardless of the amount of IFL.
- Require enterprises to follow good reduced-impact logging practices, socio-environmental safeguards and monitoring, but without rigid rules that jeopardise the viability of certified operations. The requirement that companies preserve 50 to 80% of their area has already been shown to make operations economically unfeasible (Lentini *et al.*, 2020). It is important to remember that certification is voluntary, and there are other competing systems with comparable market acceptance.
- Consider more restrictions at the planning level, or setting harvesting levels, monitoring etc. through national standards.
- Provide a collaborative framework and decision support models for a facilitated dialogue. Thresholds would be determined regionally and locally with FSC providing decision support services such as models for assessing, planning, implementing, analysing and adapting. FSC cannot expect certificate holders to bear all of the responsibility for conservation planning, implementation and monitoring.
- Consider letting go of the concept of thresholds. If we look at what is protected at the landscape level, and how well, that should have a bearing on what a certificate holder should conserve. Decommissioning of roads is important. Reduce maximum diameters to ensure retention of larger trees. Poaching control is critical. These issues are already addressed by FSC, but efforts should be increased in IFLs. Also increase in set asides relevant to specific forest. There is lots of interpretation of reduced impact logging, which could be set out more clearly/normatively. Thresholds probably make more sense in a boreal context where clearcutting is the norm and the impacts are therefore bigger.
- Core areas could be less, but we would need to be sure that the whole area of IFL still has its values and capacity for restoration, with a network of connected habitats. If FSC monitors company operations outside core areas of IFLs, there would be no need to strictly protect such large areas and FSC could reduce thresholds, e.g. to 20%, but this does depend on the quality of monitoring. Thresholds could change over time depending on performance on conservation goals outside core areas.
- No certification occurs before there is an expert reviewed assessment which identifies values and vulnerabilities. The organisation seeking certification proposes a forest management plan which is modelled to achieve maximum balance outcomes in areas where harvesting is proposed, and this is compared with the identified values and vulnerabilities to ensure plans sufficiently address the IFL and would not cause degradation. The organisation has a ringfenced fund in place for the necessary long term environmental and social monitoring and reporting prior to certification. Certification is subject to strict mandatory values monitoring and reporting on an annual basis. Strict suspension or termination conditions would follow infringements and failures to report.
- An ideal solution would be to meet the requirements of the normative framework, rather than continuing to look for fixes for logging companies. There are lots of possible solutions but they all involve foregone revenue from logs. IFL concessions could be managed using shorter rotation lengths; in many, particularly in tropical forests, these are currently entirely arbitrary. Reduced impact logging as currently defined by FSC needs to become mandatory in the IFL areas where logging occurs, i.e. at the threshold set. Secondary species should be being harvested; as currently practised, logging in tropical primary forest is all about high grading

the most valuable species. There is a fundamental problem with concession systems that have always incentivised cut and run strategies; FSC needs to facilitate the conversation about delivering ecosystem payments to both governments letting the forests and the companies harvesting them. Community forestry where control is maintained by the community rather than simply outsourced to large industrial logging interests offers another model.

- Ideally we would protect IFLs globally via standards, markets would not source from non-certified IFLs, and payments for ecosystem services etc. would be enough to offset costs for certificate holders. More realistically, it is important to look more closely at tenure systems in countries where this is a challenge. How seriously do certificate holders negotiate tenure, and how readily can it be renegotiated? It is suggested that reduced impact logging can maintain tropical IFLs, but if that is true it still leaves the question open as to what happens over time. FSC operators would open roads which would make access easier for future exploitation by other concession holders. Long term assurances need to be part of the solutions, e.g. in adjustments to tenure, government agreements, and contractual arrangements with certificate holders.
- On a voluntary basis, IFLs would need to generate benefits equal to or greater than from the original logging licences. Carbon credits and verified ecosystem services impacts together might compensate for loss of logging income. Systematic implementation of Criteria 6.2 and 6.4 and Principle 9 would provide most of the benefit of IFLs but cannot replace those associated with the sheer size of IFLs.
- The current solution has worked well in Australia so I don't think we require any improvements or refinements.

Landscape approaches

Stakeholders were also asked to describe an ideal scenario for combining certification and non-certification FSC solutions at a landscape level. The range of responses included:

- Certification solutions offer a normative requirement accompanied by non-normative guidance. Non-certification solutions would be access to expert knowledge, training opportunities and a toolbox of modelling and decision support services and products.
- Allow reduced-impact logging to be carried out in IFL areas under strict and careful standards, while also influencing public authorities to place IFL areas under some form of legal protection.
- Ideally there would be no logging at all in primary forest, but that might not be realistic, especially where governments want to develop land. In terms of thresholds, it still makes sense to work at a landscape level, assessing values and concentrating on a core area, with a buffer zone with some less damaging activities, then sustainable forest management in surrounding areas; more of a biosphere reserve model. This requires engagement with a lot of players over a long time, and needs government and Indigenous Peoples' agreement, which has rarely happened. The priority is to stabilise very dynamic landscapes, for example in Indonesia, where there is high pressure from population growth.
- Combining certification and non-certification solutions will be very hard to achieve in the context of the Congo Basin, as the landscape includes a range of forest managers with their own specific objectives and it is difficult to envisage smooth collaboration on the topic of sustainability. The only way to ensure non-certification solutions is to influence government action and policies. This was the case with the FPIC concept, which has now been included in the 2020 forestry law in the Republic of the Congo.

- Work on calculating conservation burden (Zwerts, van der Linde *et al.*, 2024) was the foundation for the agreement reached in the Congo in 2018, recognising that not all concessions have the same burden and impact. This concept is part of the way forward. A blanket solution is not an option; there are cases where we need to be stricter, and others where we can be more relaxed.
- An ideal approach would involve a continuous and structured dialogue with all stakeholders. Close collaboration with states would be essential to ensure sustainable and effective conservation of IFLs because states hold sovereignty over these lands and are the only ones able to establish and enforce laws. Also, states can allocate national budgets to conservation, mobilise international funding, and attract investments in sustainable practices.
- Regular monitoring to verify that there are no conflicts, as well as coordination between government, FSC, Indigenous Peoples and auditors.
- Contribute to ensuring that robust implementation of the HCV approach is built into sourcing guidelines. Influence regulatory frameworks to recognise the tools that are available, including certification. It always helps when national legislation is better aligned with responsible forest management.
- Alignment of logic, for example on 30 by 30; whatever counts there should count for FSC. Having a different set of rules erodes credibility.
- FSC must become an outreach organisation like WWF. We can't restrict ourselves to forests managed for timber; if we want to protect forests we have to reach more widely. Working with local stakeholders, it is possible to get better impacts at the landscape level than at the national level.
- In an ideal, Indigenous-led certification solution, looking at the Congo, the Amazon and Canada there will be huge economic/environmental/social differences and language differences, and IFLs will be much bigger than management units, and indeed Indigenous Peoples' territories. FSC could play much more of a role in facilitating dialogues and FPIC processes given variation in the overlap of IFLs, Indigenous cultural landscapes and management units.
- This is related to land tenure and who has control, for example ceded lands where Indigenous Peoples retain certain rights and can therefore provide some protection against extractive industries. FSC and the Indigenous Foundation should take a role as protectors.
- Any solution must be realistic in the short term. Companies probably won't get full compensation from carbon credits and payments for ecosystem services, and anyway what happens to downstream workers? It is essentially unethical to try to stop logging in places where people live and work. So an ideal scenario is still to combine logging with funding which might support public services in that landscape. In this way we might buy time to find better solutions.
- Money is the solution. We need to find ways to fund foregone benefits, including revenues for concessionaires and development opportunities for local communities. FSC could raise fees by a small percentage to go into a fund, then everyone would feel they were part of it – having all voted that it was a good idea! The issue with the failed motion at Bali was that the money would go primarily to Indigenous Peoples or local communities, not to concessionaires.

Global approaches

Asked what non-certification approaches FSC could take at a global level to improve the management and protection of IFLs, many stakeholders responded in terms of advocacy and securing financing, although some questioned FSC's capacity or influence at this level. A sample of the feedback follows:

- FSC has failed to advance the IFL concept within certified management units; it is not possible to push non-certification approaches globally.
- This might not be FSC's role; FSC often over-reaches. It is important to remain relevant and to grow, otherwise the potential impact in IFLs will be very slight, and right now FSC is not growing in tropical forest landscapes because of this issue.
- Advocate for IFLs to be considered as critical landscapes to be protected globally like Ramsar or UNESCO sites, or to be considered within national laws and forest management plans.
- FSC should consider how they can contribute to the Global Biodiversity Framework alongside governments, e.g. through other effective area-based conservation measures (OECMs).
- FSC could make statements in favour of UN-CBD 30x30 commitments, be a more active member of IUCN, etc. but I would prefer FSC to become more proficient and reliable in its core activities of forest management and chain of custody certification.
- National standard developers might be the first to work on the status and loss of IFLs in a given country. FSC can use the knowledge produced by standard developers to engage in global discussions about IFLs and draw attention to the need to protect these vanishing landscapes.
- FSC could encourage some scrutiny of the IFL definition by talking to organisations like Greenpeace. We should have more courage to discuss these things, rather than always trying to be neutral; if FSC doesn't take a stand it will not find solutions.
- It is important to understand the costs and benefits of protecting IFLs. FSC's suggestion is to offset opportunity costs with payments for ecosystem services, but there are still few working examples. If FSC's aim is to protect large areas of IFLs, maybe national parks are the solution.
- FSC can play many roles in facilitating the flow of finance into IFL protection. FSC is currently more active in relation to commodities than to conservation, and cannot even answer questions on certified conservation areas, so cannot prove impact. Restoration has been blocked several times at General Assemblies. The economic chamber has constantly focussed FSC on timber, but a broader package of roles and tools is needed for FSC to fulfil its mission.
- There is a business case to be made about the integrity, and restoration of integrity, of IFLs, which would have strong appeal to investors. Only one market instrument, HIFOR, is currently addressing high integrity forests. Funding is mostly available for restoration, not protection. IFLs could be the target for financial measures, including for de-fragmentation.
- While some areas merit protection and others might be managed more carefully, there must be returns otherwise people will leave FSC. There is a risk of FSC becoming a system for plantations because it is so demanding for natural forests, the very forests we originally hoped to protect.
- Recognise that the knowledge base of Indigenous Peoples exceeds what science has garnered so far, and bring in the Indigenous perspective as much as possible. Work continuously with the Permanent Indigenous Peoples Committee to learn about potential activities or conflicts.

What FSC should not do

Stakeholders were explicitly asked what FSC should not do in relation to IFLs. Feedback was diverse, but the most common theme was around not being inflexible, or assuming that one size fits all globally, or setting too high a bar, all of which would drive certificate holders away and lessen FSC's impact. There was conflicting feedback on whether FSC should retain or change the IFL definition (see the earlier sub-section on this topic).

Other notable feedback on what FSC should not do included the following:

- Don't walk away from IFLs. In the context of FSC's mission, IFLs should be among the highest priority areas, even if they are divisive and difficult. The definition is not the problem, it is a fundamental clash of values that has been there since the beginning of FSC, first seen in the division between primary and secondary forest, then the HCV concept, and now IFLs.
- Don't forget that IFLs were already implicitly included in HCV 2 even before Motion 65 (see section 5.1). Later motions have overlooked the fact that certificate holders normally have to maintain all of HCVs, not just 80 or 50%. There is a risk of losing members, or failing to attract other members, given the importance of IFLs and other primary forest to many of them. Don't overestimate the consensus on reduced impact logging as a solution.
- Don't allow production from IFLs without upfront funding being available to certificate holders to implement a comprehensive programme of surveying, management, monitoring and reporting on the status of IFLs on a continuous basis. Do not allow data to be withheld; transparency is critical.
- Don't under any circumstances weaken the IFL protection thresholds any further.
- Don't bring in new requirements on strict protection, keeping or increasing current thresholds.
- Don't continue with the current approach, including thresholds, otherwise it is over for FSC. Don't try to choose solutions that are not yet realistic, such as payments for ecosystem services, or that don't account for downstream actors.
- Don't continue to try to impose IFL solutions as currently defined within the FSC system. We should admit that the IFL concept is not workable and focus on implementing responsible forest management within the FSC system, including the HCV concept.
- Don't assume that FSC will be the "saviour of IFLs", given that forest operations occupy such a small proportion of these areas relative to the overall landscape.
- Don't ignore the fact that good forest management activities can help to preserve this sort of forest. FSC forest management is better than management under another system, or no system, or illegal logging.
- Don't ignore the local contexts and the socio-economic and cultural dynamics of the territories where IFLs are located. Don't fail to engage actively with governments and Indigenous Peoples as essential partners.
- Don't let this linger for another three years. Don't have so many parallel processes.

Annex D – Starting point for discussion of a natural forest policy

Like the proposals in section 7, this is not in any sense FSC policy. It was developed by the author based on the sources indicated below, drawing particular inspiration from early versions of the Principles and Criteria, and is presented as a basis for discussion. It has no formal status, and can and should change in response to further stakeholder engagement.

We recognise that humans and forests have coexisted for millennia. All human practices have changed forests to some degree, and there are almost no forests without signs of human influence for those who know how to look. However, while some human practices have tended to maintain complex, functioning forest ecosystems, others have resulted in deforestation or the degradation of forest to simplified forms which lack many ecosystem functions.

We recognise and celebrate the profound value of natural forests⁵⁷, including in the context of the climate and biodiversity crises facing the world, but also in terms of the livelihoods and cultural values associated with their careful stewardship, and we are committed to conserving them⁵⁸. While all natural forests are important, we recognise that some are particularly significant owing to their large scale and high ecological integrity⁵⁹.

We recognise that there is a strong cultural element in approaches to conservation, especially where there is a history of stewardship by Indigenous Peoples, and that it might not be appropriate to impose particular conservation management practices. There is a growing movement to decolonise conservation, and to put Indigenous Peoples and local communities at the heart of land stewardship.

We recognise the particular importance of stewardship by Indigenous Peoples for the protection of forests, and we are committed to promoting their tenure and management rights⁶⁰.

We recognise that challenges remain in balancing the elements of environmentally appropriate, socially beneficial, and economically viable forest management.

We are committed to halting deforestation and forest degradation, and to restoring forest ecosystems where possible (see FSC-POL-01-007 V1-0 EN *Policy to Address Conversion*). However, we also recognise the potential contribution of plantations⁶¹ to meeting needs for tree and forest products, and we are committed to their responsible management where they reduce pressures on and promote the restoration and conservation of natural forests⁶².

We recognise that unsustainable and inequitable demand for and consumption of forest products is one of the greatest threats to natural forests⁶³.

⁵⁷ There is a lengthy definition of “Natural forest” in the Principles and Criteria.

⁵⁸ Based on part of the wording of the original Principle 9 in 1994: “Primary forests, well-developed secondary forests and sites of major environmental, social or cultural significance shall be conserved.”

⁵⁹ An attempt to reflect the importance of Intact Forest Landscapes without including the divisive aspect of intactness, although “high ecological integrity” might prove just as divisive.

⁶⁰ Acknowledging one of the indirect threats to natural forests.

⁶¹ There is a lengthy definition of “Plantation” in the Principles and Criteria.

⁶² Based on part of the wording of Principle 10 from 1996: “While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world’s needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.”

⁶³ Acknowledging another of the indirect threats to natural forests.

On this basis, we adopt the following position as a starting point for FSC policy, to be reflected as appropriate in the FSC normative framework and the work of the FSC secretariat and network partners:

- All FSC certified natural forests will be managed primarily to maintain the associated environmental or cultural values in existence long-term. Management of natural forests for other purposes, including harvesting of forest products, will be permissible only where it is compatible with maintaining the associated values⁶⁴.
- All FSC certified high ecological integrity forest ecosystems⁶⁵, including landscape-level ecosystems and mosaics that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance⁶⁶, will be managed primarily to maintain or enhance the values they contain, and habitat scale, connectivity and quality⁶⁷. Exceptions will be permissible only where there are conflicts with the rights, community needs or cultural values⁶⁸ of Indigenous Peoples (including those in voluntary isolation), traditional peoples or other forest dependent communities. FSC will advocate for and facilitate the maintenance and enhancement of these high ecological integrity forest ecosystems at a landscape level within landscapes that include FSC certified management units.
- All conservation management will be ecologically and culturally appropriate and effective, as determined through participative planning and monitoring processes.
- FSC will advocate for and support Indigenous Peoples to secure land tenure and title to their ancestral territories.
- FSC will intensify work on reframing the economic basis for natural forest management, including through payments for ecosystem services.
- All FSC certified plantations will be managed primarily to reduce pressures on natural forests, by meeting needs for forest products without exposing natural forests to threats from invasive species, genetically modified organisms or chemicals⁶⁹.
- Restoration of plantations to natural forest will be supported by FSC where the gains in terms of environmental and cultural values outweigh the benefits of reducing pressures on existing natural forests.
- FSC will advocate and develop normative solutions for reduced and more equitable consumption of forest products and greater circularity in supply chains.

⁶⁴ Based on the current definition of “Conservation/Protection” in the Principles and Criteria: “These words are used interchangeably when referring to management activities designed to maintain the identified environmental or cultural values in existence long-term. Management activities may range from zero or minimal interventions to a specified range of appropriate interventions and activities designed to maintain, or compatible with maintaining, these identified values”

⁶⁵ As in the previous reference to “high ecological integrity”, this is an attempt to capture the ecosystems we currently recognise as IFLs but without the divisive aspect of intactness; it could be seen as a summary description of HCV 2, but it is certainly not an attempt to replace HCV terminology.

⁶⁶ Based on the definition of HCV 2 prior to the inclusion of IFLs: “Landscape-level ecosystems and mosaics. Large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.”

⁶⁷ Based on Brown and Senior (2018); see the sub-section on enhancing the implementation of HCV requirements in section 7.2.

⁶⁸ Drawing inspiration from Principle 3, HCV 5 and HCV 6.

⁶⁹ Drawing inspiration from Criteria 10.3, 10.4, 10.6 and 10.7.