PARTICIPATION FRAMEWORK FOR THE GENETIC ENGINEERING LEARNING PROCESS (GELP) FOR CONSIDERATION BY THE FOREST STEWARDSHIP COUNCIL

DRAFT 2 for consultation with FSC members and Stakeholders

2 January 2023

FSC FORESTS FOR ALL FOREVER™

Title:	PARTICIPATION FRAMEWORK FOR THE GENETIC ENGINEERING LEARNING PROCESS (GELP) FOR CONSIDERATION BY THE FOREST STEWARDSHIP COUNCIL
Dates:	**Consultation until:** 12 February 2023

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1.1.1. Version control

Publication date:	2 January 2023

Version	Description
V0.2	Second draft for consultation with members and Stakeholders

1. FOREWORD TO THE 2ND DRAFT OF THE PARTICIPATION FRAMEWORK

This document was developed by a diverse Panel of Experts (PoE) appointed by the Forest Stewardship Council (FSC) Board of Directors in 2022 to advise FSC on a learning process about genetic engineering and forestry. The Genetic Engineering (GE) Learning Process (GELP) described below is built around the principles of broad participation; widespread sharing of knowledge, values, and perspectives; and the early assessment of risk, in alignment with existing FSC policies and practices, including the Precautionary Approach.

An initial draft of this document was presented at the 2022 FSC General Assembly. This version of the text incorporates changes made in response to some of the comments and feedback that were received from the FSC Board and FSC members, with the expectation of further organized consultation in early 2023, prior to the finalization of a draft for consideration at the March 2023 FSC Board Meeting.

1.1. Main changes in this 2nd draft towards the 1st draft

This version of the Draft Participation Framework (V0.2) represents a revision of the draft shared and discussed at the 2022 FSC General Assembly in Bali. Conversations and feedback from FSC Board Members, Members, and attendees of the information sessions informed this revision. The Panel of Experts (PoE) also had the opportunity to consider some of the comments submitted in writing.

While the PoE encourages careful review of the full revised draft for the consultation process, we highlight the following major changes:

- As indicated above, the GELP represents a practical implementation of the Precautionary Approach (as defined by FSC) to address uncertainties, potential risks, and potential benefits of biotechnology in forestry.
- The GELP no longer encourages any research with GE trees that would not already be permitted under FSC's research exemption for GMOs. Thus, the GELP creates no new additional environmental or social risks to enable a learning process.
- The GELP now invites a longer timespan for projects (subject to continued endorsement by the FSC Board) and the inclusion of existing projects on non-certified lands that have begun under the Research Exemption.
- Annex 1 now clarifies the broad scope of learning projects encouraged by the GELP, which includes social, ecological, economic, and scientific outcomes.

1.2. The Panel of Experts

- Jason Delborne, Professor of Science, Policy, and Society, Department of Forestry and Environmental Resources, Genetic Engineering and Society Center, North Carolina State University
- Rachel Ankeny, Professor, School of Humanities, The University of Adelaide, Australia
- Desiree Elizondo, Director at CABAL, consultancy for capacity development for communities and Indigenous Peoples, Nicaragua / Costa Rica
- Aditi Mankad, CSIRO, Team Leader, Biosecurity & Biotechnology, Australia
- Steven Strauss, Professor, Oregon State University, USA
- Andrew Blackwell, Independent socio-environmental development consultant, Toronto, Canada
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- Keith Robert Hayes, CSIRO, Team leader and senior research scientist, Australia

CONTENTS

2. INTRODUCTION

Although genetic engineering (GE)[1] has been used on a large scale in agriculture since the mid-1990s, commercial applications in forestry are still very rare, despite the approval of a handful of specific varieties of GE trees by national regulatory bodies for commercial planting.

[1] For the purposes of the GELP, genetic engineering will include traditional molecular methods of plant transformation that produce transgenic organisms as well as newer methods relying on gene editing techniques (e.g., CRISPR) that may produce

GE is prohibited on FSC-certified lands, but research with GE trees is allowed by members on non-certified lands, as permitted under the Policy for Association (PfA). This compromise was born from the diversity of opinions about GE among FSC members. Some members see GE as a threat to sustainable forestry as defined in FSC principles; others see GE as a tool for increasing yields of commercial forestry to meet growing demands for renewable materials, while potentially reducing negative environmental impacts of plantation forestry.

The GE "research exemption," which includes field trials, has been permitted for certified companies in the FSC system for more than 10 years, and some certified companies are currently conducting such research. However, FSC is not involved in the design of these research projects and has no mechanism for influencing, receiving, or sharing any learning from them. Moreover, despite extensive scientific literature and (publicly available) regulatory filings on GE trees, many in FSC believe that its members and staff lack sufficient knowledge to decide whether FSC should play a role in managing GE tree development. In particular, they lack the expertise to define conditions under which companies might in the future remain associated with FSC while commercially pursuing GE.

The GELP, as described below, could help FSC to develop a better understanding of GE technology for forestry, formulate appropriate governance policies, and offer a framework for FSC to examine GE within the wider context of FSC's commitments to exploring Sustainable Intensification, including through the Sustainable Intensification Advisory Group (SIAG). The potential benefits of participating in the GELP include:

- generating a greater understanding of the benefits and risks of specific types of GE trees by sharing learnings emerging from research projects with a global community of researchers and practitioners;
- building relationships and trust among FSC and other stakeholders at local and global levels by fostering greater transparency and understanding; and
- receiving feedback from FSC and trusted experts on shared value provision, contextualized benefits, risk assessment and management, monitoring systems, governance, and dialogue mechanisms associated with potential use of GE trees in forestry.

transgenic organisms or organisms with DNA changes that would not introduce novel genetic material from a different organism (e.g., base edits, deletions).

3. PURPOSE AND SCOPE OF THE GENETIC ENGINEERING LEARNING PROCESS

3.1. Purpose and Objectives

The main purpose of the GELP is to **provide all members of FSC with opportunities to gain sufficient knowledge about potential uses of GE in forestry to inform decisions on the permissibility of GE, particularly in relation to FSC's Policy for Association (PfA).**

To this end, the GELP has two primary objectives:

- Identify the potential for using GE trees to generate "shared value" (as defined by FSC) by identifying and measuring potential ecological, economic, and social benefits and risks of GE trees as compared to conventional forestry.
- Develop and test a governance model for GE projects in forestry that a) promotes diverse and inclusive stakeholder participation in decision-making, and 2) explores FSC's potential role in guiding and monitoring GE tree plantings.

FSC will compile the learnings from the GELP to inform ongoing discussion and decision making regarding FSC policies with respect to GE. The FSC may decide, for example, whether to revisit at the next General Assembly (in 2025 or 2026) its PfA, which allows member companies to undertake GE research while prohibiting commercial use of GE trees both inside and outside of certified areas.

3.2. Scope

The Panel of Experts (PoE) recognizes that learning can occur at many stages during research and development of GE trees. Currently, FSC's interpretation in relation to what is informally known as the GE research exemption [FSC-POL-30-602][2] allows FSC members to conduct research activities with GE trees on non-certified land, so long as these activities: "a) have a clear investigative purpose (i.e., test a hypothesis), b) are carried out on a limited scale and with defined timelines that are compatible to the scope of research, and c) are conducted following all related legal requirements, including safeguards, and permits." However, with the exception of publicly available regulatory documents that are required for GE field research in most countries, there is currently no required reporting to FSC about these research activities. Thus, the results from activities under the research exemption – including any engagement activities or collaborations with local communities or other stakeholders – are unavailable to FSC as an organization.

The GELP, as proposed below, thus builds on FSC's existing research exemption for GE trees to encourage: 1) a **broader and more diverse research agenda**; 2) **greater transparency** for research that

[2] See Policy for Association, Part 1.f plus footnote on page 6.

is already allowed under the research exemption; and 3) **explicit attention to justifying research in terms of the potential contribution to shared value.** If this framework it approved, the GELP will welcome projects in one or more of the following categories:

a. **Ongoing or new research projects on GE trees in confined greenhouse or laboratory settings** that can be argued to have the potential to create significant new learning that is useful to FSC decision-making about GE policies. [Note: such research would be allowed even without the GE research exemption.]
b. **Existing research projects with GE trees on non-certified land** that are already permitted under the GE research exemption. To be considered for participation in the GELP (see details in Section 4.3 below), sponsors of existing research projects should clearly provide details about the ongoing research project including progress-to-date. The additional considerations associated with participating in the GELP include a) fostering greater transparency by sharing research results of GELP projects with FSC members, and b) explicitly assessing GELP research projects in terms of the potential of the investigated GE trees to contribute to shared value.
c. **New research projects with GE trees on non-certified land** that would already be permitted under the GE research exemption, but which involve additional activities that would contribute to greater learning via the GELP.
d. **Projects that address relevant social, economic, and/or ecological issues** associated with GE trees in comparison to conventional forestry – using systematic literature reviews, modeling, surveys, focus groups, or other recognized and rigorous research methods.

Annex 1 provides examples of potential learning projects that might be pursued within the GELP for each of these research categories.

4. PARTICIPATING IN THE GENETIC ENGINEERING LEARNING PROCESS (GELP)

4.1. Call for Proposals

If this framework is approved, FSC will issue a Call for Proposals to its members. The Call will specify that:

a. Any public sector entity or company that is an FSC member or certificate holder may apply to the GELP, and interested non-affiliates are encouraged to seek out at least one FSC member as a collaborator to apply. Collaborations between private and public research or management bodies are encouraged, particularly where they elevate the quality and reliability of the findings or improve engagement with diverse stakeholders.
b. Applicants who are selected for participation must cover the costs of their proposed activities, as well as a portion of FSC's costs in conducting the GELP.
c. In principle, FSC will accept as many projects as possible to maximize learning, but competitive selection might be necessary if the number of proposals exceeds the capacity of FSC and the PoE to evaluate and monitor projects.

d. Project applicants must document that the proposed project fully complies with the legal requirements imposed by the national/regional jurisdiction where the project is to be carried out, including all mandated risk assessment and/or management processes.
e. Applicants will be required to commit to transparency in project implementation and open communication of all GELP project results, subject to intellectual property limitations and other disclosure concerns that are explicitly defined and mutually agreed by the applicant and FSC at the project outset.
f. Applicants may choose to submit all, some, or none of their existing research projects currently permitted under the GE research exemption. However basic information about all current GE-related field projects underway by applicants is required, and fuller disclosure of information about them is encouraged in the interest of fostering more transparency, even if only a subset of projects is submitted for consideration as part of the GELP.
g. Projects may be proposed for up to 3 years, though multiple 3-year phases may be proposed and approved over time in sequential increments (assuming that FSC chooses to continue the GELP).

4.2. Project proposal submission and assessment

The proposal submission for participation in the GELP will be conducted in two stages, an Expression of Interest followed by invited Full Proposals.

4.2.1.Stage 1: Expressions of Interest (EoIs)

There will be an open call for EoIs. See Annex 2, which provides a table of contents for submission guidelines. The EoIs will be assessed by the PoE by considering their overall value to the FSC's GELP; scientific rigor and significance; potential to produce shared and added economic, environmental, and/or social value; and feasibility. The PoE will recommend a list of applicants to the FSC Board, which will decide which applicants will be invited to prepare full proposals for submission in Stage 2.

4.2.1.Stage 2: Full Proposal

A table of contents for a Full Proposal is provided in Annex 3.

Full Proposals will be thoroughly assessed by the PoE, taking into account the following criteria for projects wherever relevant:

1	Gap in Current Knowledge and Project Significance
2	Potential for Contribution to FSC GE Learning Process
3	Plan of Work (feasibility, methodological rigor and appropriateness, clarity)
4	Project Team (track record, training, structure, roles, and strength of collaborations)

5	Potential to Create Shared Value (Economic, Environmental, and/or Social)
6	Regulatory Permissions and Permits (progress to date and roadmap for project)
7	Plans for Engagement with Relevant Communities (in alignment with FSC's policies on FPIC)
8	Details of Risk Assessments and/or Environmental Impact Assessments Prepared as Part of Regulatory Approval Processes
9	Social and Environmental Risk Management and Monitoring Plans
10	Project Governance Model (decision-making structures, authorities, and responsibilities)
11	Transparency (including mechanisms for making project results publicly available and limits requested by the applicant due to IP or security concerns) and willingness to provide information on other GE forestry activities currently active under the Research Exemption.

Applicants may be asked to meet (virtually, in most cases) with the PoE to discuss their proposal. Applicants may receive feedback and requests for revisions or clarifications, prior to their proposal being forwarded for a final decision by the FSC Board.

5. GOVERNANCE OF THE GELP

5.1. Governance Structure

The Governance Structure of the GELP is designed to ensure:

- Compliance with the following principles that align with FSC's policies and frameworks:
  - involvement of stakeholders in processes associated with GE-related developments, including inviting feedback on finalizing the GELP and on decisions relating to inclusion of projects within it;
  - respect for rights of Indigenous Peoples and local communities, in part by inviting their involvement in the processes associated with the GELP (e.g., FPIC);
  - effective management of potential social, environmental, and economic risks, and maximization of benefits; and
  - creation of shared social, environmental, and economic value through the development of GE in forestry.

- Pursuit of the following goals associated with the GELP:

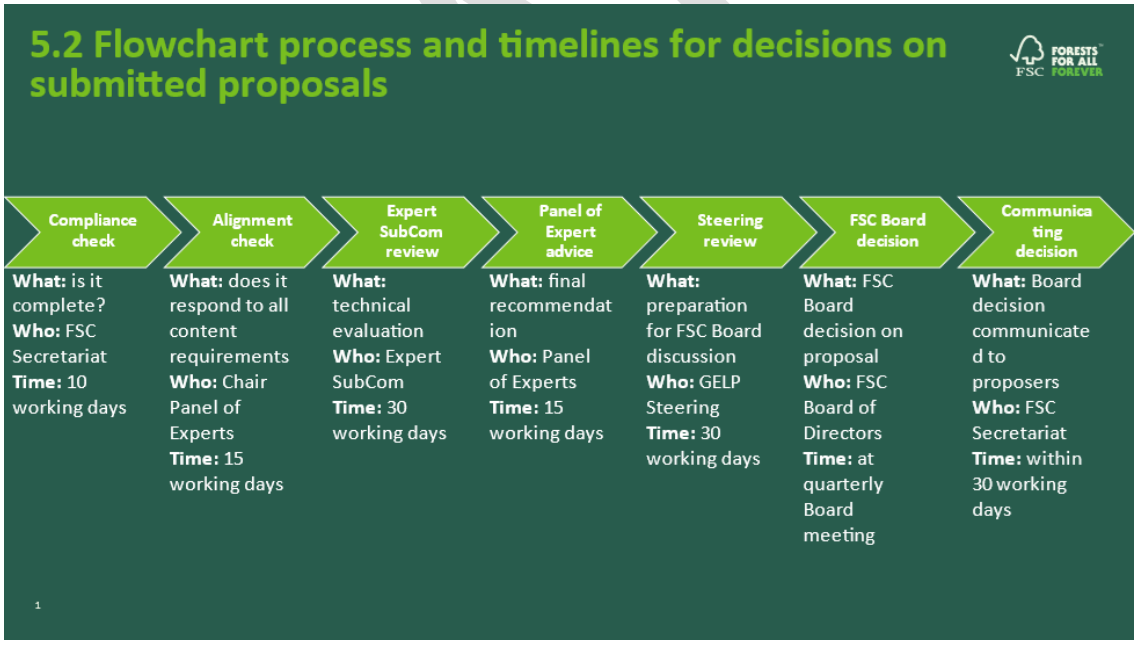
- increased transparency about research on and potential commercial uses of GE trees;
- inclusive access for stakeholders on information and learnings from the GELP projects;
- robust and inclusive societal engagement of diverse stakeholders;
- explicit strategies for risk mitigation and ongoing monitoring of these strategies;
- delivery of tangible societal benefits based on rigorous evaluation of all GELP projects; and
- identification and promulgation of best scientific, social, environmental, and other practices in concert with regulatory requirements in any locale in association with research and development of GE trees.

The following table describes the components of the Governance Structure as well as their roles and responsibilities:

COMPONENT	ROLES AND RESPONSIBILITIES
FSC Board of Directors	Endorsing/finalizing the Participation Framework; approving or rejecting proposed projects; and making go/no-go decisions about the Participation Framework every year throughout the duration of the GELP. The FSC Board retains the right to stop an entity's participation in the GELP at any point in case of any breaches of agreement or discovery of any unacceptable risks that are identified through the review processes or which are considered outside of this cycle at the request of the Steering Group.
GELP Steering Committee	Comprised of senior staff and three Board members, the Steering Committee will guide the processes associated with the GELP and prepare materials to inform decisions to be taken by the Board.
FSC Membership	Discussing and making decisions on GE-related issues in accordance with their authority as defined in the FSC Statutes.
Sustainable Intensification Advisory Group (SIAG)	Chamber-balanced advisory group of FSC members that ensures membership concerns and stakeholder perspectives are considered.
Secretariat	Planning and executing the GELP administrative process.

COMPONENT	ROLES AND RESPONSIBILITIES
Panel of Experts (PoE)	Providing expert knowledge based on their diverse backgrounds and working with the Secretariat and SIAG to advise the Steering Group and the Board; developing the draft Participation Framework; assessing the EoIs and Full Proposals for consideration by the Board as outlined below; and reviewing projects during execution with attention to the principles articulated above.
Certificate holders, members, or research institutions	Submitting EoIs and invited Full Proposals for multi-year learning projects within the GELP, as described in the Scope (Section 3.2) and following procedures defined in the GELP.

5.2. Process and timelines for decisions on submitted proposals (see Flow chart below)



1. SUBMISSION: All EoIs and Full Proposals must follow the structure and instructions in Annexes 2 and 3 and be emailed to the Secretariat at FSC.
2. COMPLIANCE CHECK: The Secretariat will check all EoIs and Full Proposals for basic compliance with deadline, length, and format/content requirements and respond to applicants within 10 working days.
3. ALIGNMENT CHECK: Compliant EoIs and Full Proposals will be sent to the Chair of the PoE (or a PoE delegate designated by the Chair) to assess basic alignment with the

requirements and goals of the GELP; this initial review will be completed within 15 working days.

4. EXPERT SUB-COMMITTEE REVIEW: Aligned EoIs and Full Proposals will be assessed by a sub-committee from the PoE (of at least 3 members, depending on the range of expertise required) to produce a technical evaluation. These members will provide a written evaluation and recommendation (do not endorse, may endorse pending revisions, or endorse with minor or no revisions) for consideration by the full PoE. This technical review will be completed within 30 working days.
5. PANEL OF EXPERTS (PoE) REVIEW: The full PoE will review the subcommittee recommendations and produce a final recommendation based on consensus. If consensus cannot be reached, a vote will be taken and PoE members will forward the results and an explanation of areas of disagreement to the GELP Steering Committee. PoE review will be completed within 20 working days.
6. GELP STEERING COMMITTEE REVIEW: The GELP Steering Committee will review the PoE's recommendations and prepare each EoI and Full Proposal for consideration by the Board. At this stage, the GELP Steering Committee may request additional information from the applicant and/or additional evaluation or clarification from the PoE. Steering Committee review will be completed within 30 working days.
7. FSC BOARD DECISION: The FSC Board will review the EoIs and Full Proposals (along with all review materials assembled by the GELP Steering Committee) and approve, reject, or request revision of each project. The Board will take these actions at their quarterly meetings.
8. FSC SECRETARIAT: Within 30 working days of the Board's final decision, the FSC Secretariat will provide detailed feedback on all EoIs and Full Proposals to applicants. If an EoI is approved, applicants should prepare a full proposal for submission within 50 working days. For successful Full Proposals, the Secretariat will publish the titles and executive summaries (see Annex 3) on the FSC website and make available by request the Full Proposal text to any FSC member.

5.3. Process for management and monitoring of accepted projects

1. BIANNUAL PROGRESS REPORTS: Online progress reports are expected twice per year for all successful GELP projects. The contents of these brief progress reports will be agreed when the project is endorsed by FSC, but at a minimum must include information on consultations with stakeholders and compliance with agreed biosafety protocols, as well as research progress including any changes to timing, goals, or methods. The progress reports will be evaluated by a sub-committee of the PoE with specific knowledge relating to the issues noted, with any concerns noted within 30 working days of submission and communicated to the applicant for response and resolution. The biannual reports together with feedback from the PoE will be made publicly available on the FSC website.

2. ANNUAL REPORTS: Yearly reports will summarize the project to date and will include a detailed assessment of progress in relation to the learning goals. For field research, these reports will be prepared following a field visit by an FSC designee.
3. ANNUAL RENEWAL: The PoE will consider the yearly report and make a recommendation to the Steering Committee, which in turn will present the reports and recommendations to the FSC Board. The Board will consider and vote on whether each project should continue to be included as part of the GELP and provide feedback to the project team, including concerns for response and resolution. The Board may choose to cease its endorsement of a project as a result of annual reviews, or at any point in time if a serious violation of agreed protocols occurs (e.g., planting GE trees in a certified forest or use of GE trees in certified products).
4. TRANSPARENCY: Because a main goal of the GELP is to allow FSC to explore the potential for GE trees to contribute to shared value, all results, methods, and reports from approved GELP projects will be made publicly available. None of the methods and findings directly relevant to the core goals and hypotheses being studied will be permitted to be confidential except if agreed explicitly in advance by the applicant and FSC for IP or security reasons. FSC does not require participants to give up their IP rights to take part in the GELP, but clarity about access to information and biological materials must be made explicit in each proposal.
5. EXTERNAL COMMUNICATION: Project teams may communicate results or information about their GELP projects to other audiences at their discretion, but any explicit mention of FSC and its oversight, endorsement, or involvement in the project requires prior express written consent from the FSC Secretariat.
6. CONFLICT RESOLUTION: Any conflicts related to the GELP arising among project teams, stakeholders, local communities, or FSC members or certificate holders should be reported to the FSC Secretariat, who will coordinate the consultation of involved parties and any response according to FSC standard processes and procedures.

6. ANNEX 1: EXAMPLES OF POTENTIAL LEARNING PROJECTS

The GELP scope identifies four categories of GE research projects (see Scope, Section 3.2). This appendix lists those categories and provides a few examples of potential foci for learning projects and the types of questions they might address. This list is not intended to be definitive or limiting in any way, and FSC welcomes projects that focus on other topics that will assist in their learning.

Studies that address relevant social, economic and/or ecological issues. These types of research project might examine or document:

- the perceptions of stakeholders, communities, indigenous peoples, or broader publics about GE forestry or uses of GE trees;
- the impacts on labor or cultural practices that have occurred or are predicted to occur following the introduction of GE trees in a certain region, and the associated contributions to shared value;
- the intersection of national, regional, local, and/or indigenous governance frameworks that apply to GE trees, and what processes might improve the overall governance regime or coexistence measures for GE and non-GE trees in forest landscapes;

- the ecological impacts of GE trees, such as changes to soil health, biodiversity, water demand, or carbon budgets.

On-going or new research on GE trees in confined greenhouse or laboratory settings. These types of research projects provide an opportunity for early engagement with, and participation of, stakeholders and Indigenous Peoples in:

- defining Target Product Profiles (TPPs) for GE trees including the metrics and performance standards that might be used to identify environmentally, economically and socially acceptable GE lines;
- identifying the concerns, values at risk, potential pathways to harm (hazard identification) and risk assessment and measurement endpoints for GE trees that meet TPP performance standards under confined conditions;
- understanding how shared value might be created, measured and verified if GE lines that meet TPP standards under confined conditions are planted on non-certified lands; and
- testing new high value GE science approaches, such as new means for improving tolerance of heat or drought relevant to sustaining forests under climate change.

Ongoing or new research on GE trees on non-certified land. New or existing field trials with GE trees on non-certified lands may address the potential socio/economic benefits and human health or environmental risks associated with a variety of phenotypic characteristics achieved through genetic engineering to improve:

- wood quality and associated tree growth characteristics, for example, modified lignin chemistry with the goal of reduced chemical and energy costs during pulping or biofuel production;
- insect and disease control, accounting for the dynamic nature of pest populations under naturally variable and gradually changing climate;
- weed control through herbicide tolerance and the associated changes to land management practices (such as tillage and stand control), soil biodiversity and plantation behaviors (such as chemical usage and reliance) that may occur;
- growth and survival under abiotic stresses, from drought, heat, and salinity, due to climate change or long-term effects of land management (e.g., irrigation);
- containment of invasive plantation trees, such as eucalypts, pines, and acacias in some environments.

For ongoing or new research on GE trees on non-certified land, the GELP particularly welcomes projects that compare the benefits and risks of GE trees with conventional plantations and breeding methods, which are often designed to achieve similar goals. This could include, for example, how risks are managed, how shared value accrues, and how these are measured at landscape scales.

7. ANNEX 2: EXPRESSION OF INTEREST (EOI) TABLE OF CONTENTS

1. Introduction
    a. Project title
    b. Authors and associated institutions
    c. Project abstract (1 paragraph)
2. Objectives and gaps in available knowledge
3. Expected results
    a. Specific learning goals of the project
    b. Scientific value
    c. Potential economic impacts
    d. Potential environmental impacts
    e. Potential social impacts
4. Project team
    a. Project organization and structure
    b. Summary of qualifications and experience
5. Schedule and deliverables
    a. Schedule
    b. Deliverables
6. Limitations and feasibility of proposed project

Applicants must submit an Expression of Interest (EoI) of no more than 3 pages that describes the proposed project at a high level and should also make clear how the aims or learning goals align with the GELP.

8. ANNEX 3: FULL PROPOSAL TABLE OF CONTENTS

1. Executive Summary (1-2 pages)
    a. Project title
    b. Authors and associated institutions
    c. Summary of project and overview of learning goals
2. Objectives.
3. Expected Results
    a. Specific learning goals of the project
    b. Science value
    c. Potential economic impacts
    d. Potential environmental impacts
    e. Potential social impacts
4. Nature of Activities[3]
5. Project Team
    a. Project organization and structure
    b. Roles and activities tasks members will be undertaking
    c. Description of the collaboration between entities
    d. Summary of qualifications and experience
    e. List of all team members and qualifications
6. Disclosure of Potential or Perceived Conflicts of Interest
7. Scientific Justification of the Significance of the Project
8. Justification of Alignment with the GELP Goals
9. Description of the Shared Value the Project Creates or Investigates
10. Caveats, Pitfalls, and Alternative Approaches to Contingencies
11. Project Transparency
    a. Locally
        i. Participation of all potentially affected parties in ongoing project monitoring
        ii. Grievance mechanism
    b. Locally & Globally: Identification and management of risks and opportunities
    c. Globally
        i. Open reporting mechanism for the process and all results
        ii. Mechanism for reception and response to all comments and questions posed by any FSC member
12. Schedule and Deliverables
    a. Schedule and Milestones
    b. Deliverables
13. Target Product Profile[4]

[3] As described in Section 3.2 of the Participation Framework

[4] For projects that involve field trials, a Target Product Profile (TPP) that identifies the desired attributes and minimum performance standards that the GMO organism must achieve to be considered "acceptable". These performance standards

14. Risk Management Plan (which may draw heavily from submitted regulatory documents)
    a. Description of the GMO
    b. Receiving Environment
        i. Environmental Values
        ii. Social Values
    c. Hazard Identification and Pathways
    d. Risk Assessment
    e. Risk Management Plan
    f. Residual Risk after Implementing Management Measures
    g. Contingency Plan
15. Monitoring Plan
    a. Managerial
    b. Consequences
        i. Environmental
        ii. Social
        iii. Economic
16. Stakeholder Engagement Plan
    a. Stakeholder Mapping
        i. Methodology
        ii. Identification and Qualification
    b. Stakeholder Engagement
        i. Purpose of Engagement
        ii. Strategies
        iii. Channels
        iv. Messages
        v. Expected Stakeholder Engagement Experience[5]
17. Reporting[6]
18. Project Regulatory Approvals and Permits
19. Project Governance
    a. Authorities and Responsibilities
    b. Decision Making Process
    c. Structure of the Project Team and Relationship with the Authorities and Responsibilities within the Proposing Entity
20. Team Members Curricula Vitarum[10]
21. Supplemental Figures or Tables as Annexes

should address all relevant dimensions, such as genetic and phenotypic properties or characteristics, production characteristics, ecological and social risks and benefits.

[5] Two-way dialogue with project team, educational outreach, listening sessions, etc

[6] Resumes or short CVs for project leads and key technical staff (up to two pages each) providing relevant education, training, and experience

To the degree possible, the proposal should follow the structure provided above. The narrative portion (Sections 6-15) should not exceed 5,000 words with up to 10 additional pages of figures or tables in Section 21, and the required number of pages for CVs dependent on the number of team members.

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