The following document summarizes the input received during and immediately following the 2018 Controlled Wood Regional Meetings and provides rationale for the resulting mitigation options for the Cape Fear Arch Critical Biodiversity Area (CBA), along with definition of any identified gaps in the final set of options.

The US Controlled Wood National Risk Assessment identifies two drivers of biodiversity in this CBA that may be threatened by forest management activities: Longleaf Pine and Pocosins.

* Longleaf Pine: As the specified risk area associated with this CBA **does not** overlap (for the most part) with the specified risk area associated with HCV 3 Native Longleaf Pine Systems (NLPS), **any Organization that is mitigating risks associated with sourcing from within this CBA will still be required to mitigate the identified risk associated with this driver of biodiversity**. However, mitigation may be implemented by selecting one of the mitigation options provided for NLPS.
* Pocosins: Mitigation to address the identified risk associated with this driver of biodiversity is also required, and the proposed mitigation options are provided below.

*Consultation Insights: Overall, stakeholder feedback on the proposed mitigation options for the Cape Fear Arch CBA was generally limited. However, this limited feedback does provide support for the following thematic approaches: support of conservation initiatives, education and outreach to foresters, landowners, etc., landowner incentives, and participation in the Cape Fear Arch Collaborative.  Additionally, comments on similar themes for other risk topics have consistently suggested merging thematically similar options, adapting options to provide flexibility (e.g., don’t specify certain NGOs, don’t limit the management tools that may be used for conserve biodiversity), and also being more specific regarding the intent of the mitigation option and what it is expected to achieve. Finally, consistency of mitigation approaches between risk topics should provide the potential for efficiencies for Organizations that would like to take similar approaches for different risk topics, or in different regions, and therefore, the following revised options draw from options for similar themes that were developed for other risk topics.*

**Please note that almost any of the proposed mitigation options may be done individually or in collaboration with other certificate holders, or other entities that have similar desired outcomes. Collaboration is encouraged to scale up potential mitigation impact, and FSC US will seek to assist with that collaboration when feasible.**

**CENTRAL THEME: Conservation Initiatives**

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| --- | --- |
| Original Proposed Option  (#1) Work with land trusts and other conservation organizations to clearly identify and map those very small, very sensitive natural communities that should be managed very carefully, such as old-growth stands of cypress/gum swamps or Longleaf pine and embedded small wetland communities that can be damaged by forest management machinery | Topline Input   * More support than opposition * Change to ‘identify and protect’ * Locations may already be known * Change to ‘work with other organizations’ |

**Proposed Revised Mitigation Option**

**The following is offered as an option that could be scaled for any impact level:**

**Engage with and/or provide monetary or in-kind resources to conservation partnerships, organizations or similar entities that are supporting or promoting programs or projects to develop new or augment existing programs that will identify and conserve pocosins within areas of the specified risk area and the Organization’s supply area, with an overall desired outcome of conserving the biodiversity associated with these systems. These entities may include: 1) partnerships including government and/non-government organizations or non-governmental organizations working alone that have active programs/projects to conserve pocosins and their associated biodiversity; and/or 2) federal, state and/or local governmental organizations.**

**CENTRAL THEME: Education & Outreach**

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| --- | --- |
| Original Proposed Option  (#2) Improve logger, landowner and forester education to reduce the use of bedding practices within the Cape Fear Arch CBA | Topline Input   * Focus on identified threat from forest management activities: practices that alters hydrology * Bedding doesn’t affect hydrology * Also consider forestry associations * Change ‘reduce’ to ‘encourage reduction’ * General support for education as an approach |

**Proposed Revised Mitigation Options**

**The following is offered as an option that could be scaled for any impact level:**

**Using materials (as described below), and with a desired outcome of conserving biodiversity associated with pocosins within the specified risk area and the Organization’s supply area, communicate to audiences (as described below) the values of pocosin biodiversity, threats from poorly implemented forest management, and management practices that will reduce or eliminate these threats, including but not limited to practices that maintain and enhance pocosins and that do not alter hydrology.**

* **Materials: Developed by, or developed in cooperation with, organizations/individuals with expertise in pocosin biodiversity conservation, or FSC US, and delivered in a manner that will be the most effective in achieving the desired outcome of conserving biodiversity associated with pocosins, while reflecting the specific context and characteristics of the Organization.**
* **Audiences: Audiences will reflect the specific context and characteristics of the Organization, but communications should be directed toward those audiences where the communications will be most effective in helping to achieve the desired outcome of conserving biodiversity associated with pocosins within the specified risk area and the Organization’s supply area. Depending upon the Organization’s location in the supply chain, communications may be directly with loggers, land managers or landowners responsible for the management activities implemented, or through intermediaries such as community members, forest managers, suppliers, forestry associations, landowner associations, or in collaboration with organizations/individuals already working with the same desired outcome.**

**The following is offered as an option for Organizations with suppliers that are land managers or that purchase directly from the source forest:**

**Develop/adapt a procurement policy that reflects the above communications themes and clearly states the expectation that suppliers will promote conservation of pocosin biodiversity and will not provide materials from forests where these values were threatened as a result of the forest management activities that produced the forest materials. This will require providing a description of pocosin systems (as they occur in the supply area), potential threats from forest management activities, and the kinds of activities that would maintain or enhance pocosin biodiversity in the supply area.**

**NOTE: Actions to demonstrate policy enforcement and communicate policies on sourcing to suppliers should be audited under the Due Diligence system requirements within the 40-005V3-1 standard section 1.1**

**CENTRAL THEME: Influence Policy**

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| Original Proposed Option  (#3) Influence forest practices regulations or policies to reduce the use of bedding practices within the Cape Fear Arch CBA | Topline Input   * Clarify how an Organization can influence policy * Consider forestry association membership * Consistent negative or questioning feedback |

*Consultation Insights: Input shared provided little to no support for this mitigation option. The feedback questions the potential effectiveness of this approach in mitigating the identified risk.*

**CENTRAL THEME: Prescribed Fire**

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| Original Proposed Options  (#4) Work in partnership with Partners for Fish & Wildlife, the North Carolina Wildlife Commission and the Natural Resources Conservation Service (Farm Bill) to increase the use of fire as a management tool within the Cape Fear Arch CBA  (#5) Support the establishment of a Prescribed Burn Association | Topline Input   * Support for fire as an important management tool * Clarify how this mitigates the identified risk * This already exists * States have burn regulations |

*Consultation Insights: The identified threats to pocosins from forest management activities do not include any issues related to fire. Therefore, the concern expressed regarding the potential effectiveness of this as a mitigation approach in addressing the identified risk is valid.*

**CENTRAL THEME: Cape Fear Arch Conservation Collaboration**

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| Original Proposed Option  (#7) Participate in Cape Fear Arch Conservation Collaboration meetings and help to promote their objective of enhancing cooperation and communication regarding regional conservation issues within the CFA landscape | Topline Input   * Support the proposed mitigation option |

**Proposed Mitigation Options**

**The following is offered as an option that could be scaled for any impact level:**

**Participate in Cape Fear Arch Conservation Collaboration meetings and help to promote their objective of enhancing cooperation and communication regarding regional conservation issues within the specified risk area and the Organization’s supply area.**

**GAPS IN THE SET OF MITIGATON OPTIONS**

FSC US Staff evaluation of this set of mitigation options, through the lens of the shared criteria, did not identify any significant gaps, with the possible exception of the requirement for 'auditability.' We will be looking to your comments for suggestions on how to address this potential gap, as well as for identification of any other gaps and suggestions for their resolution. Additionally, we will be meeting with Certification Bodies during the consultation and expect that they will also provide input on improvements in auditability.