

**Summary of Comments Received  
International Standard for Sustainable Wild  
Collection of Medicinal and Aromatic Plants  
(ISSC-MAP)  
Draft 2**

**16 July 2005  
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STEERING GROUP  
for the development of an  
International Standard  
for the Sustainable Wild Collection  
of Medicinal and Aromatic Plants



**TRAFFIC**

**IUCN**  
The World Conservation Union



MEDICINAL  
PLANT  
SPECIALIST  
GROUP

## 1. Project Background

The German Federal Agency for Nature Conservation / Bundesamt für Naturschutz (BfN) has provided start-up funding for the development of an international standard and performance criteria for the sustainable wild collection of medicinal and aromatic plants. The project is being implemented by members of the MPSG through IUCN-Canada, and by WWF/TRAFFIC Germany.

The **mission** of this standard is to ensure the long-term survival of MAP populations in their habitats, while respecting the traditions, cultures and livelihoods of all stakeholders.

The **objective** of this standard is to provide a framework of principles and criteria that can be applied to the management of MAP species and their ecosystems. It provides guidance for sustainable wild collection of MAPs, and a basis for audit and certification.

An international advisory group has been established with members from the medicinal plant / herbal products industry, small-scale collection enterprises, non-government organizations working with community collectors, conservation organizations, and certification organizations. The advisory group met on the island of Vilm, Germany, in December 2004 to revise a first draft, agreeing on the mission, objective, and central principles of the standard.

A second draft was distributed for comment in April 2005. The project steering group is currently reviewing comments received. The criteria, indicators, and verifiers developed through this consultative drafting process will be tested in several field projects beginning in July 2005. Plans are currently underway to develop implementation models and strategies in four target areas: certifiers, governments through CITES and CBD, industry and donor agencies.

The current draft standard and proposed revisions for a 3<sup>rd</sup> draft will be presented in two venues during the upcoming XVII International Botanical Congress in Vienna, Austria, 17-23 July 2005 (Wednesday, 20 July, Session 6 of the main Congress; and during an IBC Side Event: From Source to Shelf: Sustainable Supply Chain Management of Medicinal and Aromatic Plants (<http://www.floraweb.de/proxy/floraweb/map-pro/ibc.html>).

Information on the status and activities of this project is available via the project website (<http://www.floraweb.de/map-pro>) and will soon be available via the MPSG website (<http://mpsog.org>). These documents are also accessible via the IUCN-Canada website (<http://www.iucn.org/places/canada>).

## 2. Overview of Comment Process and Results

In April-May 2005, the 2<sup>nd</sup> draft ISSC-MAP was sent to approximately 80 members of the project advisory group and other interested organizations and individuals for comments. Comments were received from 26 respondents (some of these representing multiple individuals or groups), a response rate of 34%.

Detailed comments on the text of the standard components (annex III) were encouraged using a standardized file in ms excel format, intended to facilitate compilation and comparison of numerous proposals of alternative structure and text. General comments were invited using a simple ms word text file or e-mail format. Comments inserted into the text of the draft 2 document were actively discouraged by providing a pdf file rather than a ms word file format. Ten respondents used both text and excel formats; 15 respondents used text format only; one respondent used only the excel file format.

Numerous respondents found the excel file response format too complicated and too time consuming to use, and would have preferred to use a text-edit function in a text-file format. It is clear that this obstacle limited the number of comments received on the specific components of the standard (Annex III). However, even 26 individual sets of comments received in the latter format would not have been manageable for compilation and comparison in preparation of a revised (3<sup>rd</sup>) draft.

The subsequent sections summarize the major points from the comments of the 26 respondents. Many helpful comments and suggestions on specific points are not repeated here, but will be considered in the revision of the 2<sup>nd</sup> draft ISSC-MAP.

### **3. Comments on topics presented in the introductory text**

#### **3.1. Title**

Two respondents proposed that the name of the standard should be changed or altered to be more user-friendly (i.e., not an acronym), include the word “wild”, and replace “collection” with “sourcing”.

#### **3.2. Mission and objective (Section 1.4)**

Two respondents recommended alternate wording of the objective to emphasize local and community stakeholders, and the role of government policy, law, and regulations in implementing the standard. Numerous comments on other aspects of the standard, particularly those concerning scope and application, propose a shift or narrowing of the focus of the standard, which, if accepted, should be reflected in the statement of mission and objective.

#### **3.3. Scope and Application (Section 1.5)**

##### Scope

- Reviewers who commented on the scope of the standard were satisfied with the inclusion of socio-economic and cultural principles and criteria (e.g., fair trade, equity), in addition to biological principles and criteria.

- One respondent suggested that addressing sustainability, fair-trade, and product quality in a single standard makes the ISSC-MAP “more realistic from an industry perspective”.
- One respondent proposed that cultivated habitats should not be excluded as important for sustainable wild collection of MAP species.
- Other respondents indicated specific components of the standard that they consider beyond the scope of the ISSC-MAP (e.g., criterion 8.3.4, limiting conversion of forest to MAP plantations).

### Application

- Several respondents proposed that the most important application of a standard for sustainable wild collection of MAP is to small-scale collectors’ organizations and community-based enterprises.
- These respondents feel that the current draft standard will not promote involvement of collectors / local communities, but instead will give an advantage to large-scale commercial enterprises.
- Two respondents suggest that the formation of or support for collectors’ organizations is central to the successful implementation of the ISSC-MAP.
- One respondent suggests that the information requirements in the current draft standard will favour its application to species that are already well known in the marketplace over those that are little known, and that as a result, species from the Old World (Asia, Africa) will be favoured over New World (esp. Latin American) species of MAP, which are less well studied.
- Other unintended (perverse impacts/outcomes) were identified: e.g., under Principle 2, customary rights may be interpreted to exclude local access for commercial production where only subsistence use has previously existed.
- Several respondents pointed out confusion about whether the standard will be applied to individual collectors, to organizations and enterprises, to the agency/entity with resource management responsibility, or to the area under resource management.
- At least two respondents suggest that an adaptive management approach and a precautionary approach are contradictory, and that recommending a precautionary approach will be unfair to smaller collectors’ groups and enterprises who can least afford the delays and costs of gathering sufficient documentation and field-based information in advance of collection activities.
- Application of the ISSC-MAP in different regions of the world will require different implementation strategies (see 3.4 below). For example:
  - In South Asia, working through government forest management units and coordinating with existing management plans;
  - In Latin America, working through country participation (e.g., national strategies, legislation, regulation) in international conventions, such as the CBD and CITES.

### 3.4. Implementation

Most respondents wanted more clarity on how the standard will be implemented (e.g., voluntary code of conduct, good-practice guidance, certification system).

Several respondents felt that the current draft standard will not be practical to implement, because:

- Fundamental conditions, such as establishing clear legal resource access and tenure, either do not exist or cannot be enforced in many countries and local situations.
- Where legitimate access and tenure do exist and are acknowledged, it may not be possible for resource managers to limit access only to the otherwise legitimate collectors who also comply with this standard (i.e., sustainable use has less priority than do customary rights).
- Too little ecological information about MAP resources is available, and there are insufficient funds and research capacity to provide the information needed.
- Many wild MAP resources have scattered, fragmented distributions, and collection activities are similarly dispersed and decentralized (i.e., compliance with this standard based on distinct populations or management areas will be impractical).

#### Harmonization

- Harmonization with other product labels and process certification standards (e.g., organic agriculture, forest products, and fair-trade) can build on:
  - MAPs already included in certification systems – organic, fair-trade (Rooibos), forest management (*Taxus*).
  - Overlap in scope and objectives of draft ISSC-MAP with existing labels and certification systems (especially with organic and trade association codes of practice, which are also concerned with practices that contribute to waste reduction and superior product quality, e.g., by regulating time of collection).
- ISSC-MAP could concentrate on sustainability components, and liaise with other organizations that concentrate on fair-trade and product quality for realistic components and implementation in these areas.
- Attention is needed to match definitions and hierarchy of components with other standards (e.g., FSC, IFOAM)

### 3.5. Users and beneficiaries (Section 1.6)

- One respondent points out that efforts to certify product quality (e.g., sanitation, handling) of NTFPs have benefited retailers and consumers, but have not been beneficial to producers (creating trade barriers and re-configuring trade networks).

- The same respondent also points out that there is not currently a retailer/consumer market for sustainably produced NTFPs, nor for MAP products, and that the most promising approach will likely be to encourage producers (collectors, consolidators, processors, distributors, manufacturers, and others in the chain of supply) to be interested in MAP resource sustainability.

### 3.6. Responsibility (Section 1.7)

Many of the respondents posed the question, “Who is responsible?”, broadly for overseeing application and outcomes of the standard, and more specifically for the research, monitoring, and other actions required to meet many of the proposed criteria. Suggestions include different institutions (village or collectors’ organizations, federations of village organizations, industry and trader organizations and federations of these, government line departments, law enforcement agencies, research institutions, certification/labeling organizations, conventions and treaties) taking responsibility for different sections of the standard.

## 4. Comments on structure, format, and language

Ten respondents commented generally on the structure, format, and language of the 2<sup>nd</sup> draft standard. Four respondents found the current draft well organized, logical, and comprehensive. However, six respondents felt that the current draft is difficult to read, the structure too complicated, the language too technical for intended users (“intimidating”, not “field-friendly”), some of the content impractical for implementation, and the format too long. Two respondents in particular advocated a “more generic, less bureaucratic” document, or a “minimum required / maximum desired” set of standards”. These general comments were supported by specific comments on the standard components.

### 4.1. Structure – Conceptual Framework (Section 2.1)

#### Organization of components

- Four of the seven respondents who commented generally on the structure of the standard itself (Annex III) found it clear and well organized.
- One respondent found the component definitions in Table 1 of the 2<sup>nd</sup> draft document confusing, and offered suggestions to clarify these definitions.
- Some criteria, in particular, should be reworded to include a performance aspect or measure.
- A clearer sorting and separation between indicator and verifier components is needed.

#### Suggestions to simplify the structure of the standard include:

- Reduce the introductory sections to 1-2 pages; treat the standard itself (currently annex III) as the main text.

- Provide current introductory text as a separate background document.
- Reformat text of the standard (annex 3) in vertical pages, including only the principles and criteria.
- Place remaining components (indicators, verifiers / types of verification, and other guidance) in a supplementary text or explanatory guide.
- Reduce length and overlap between components by combining or eliminating components (many specific proposals).

#### 4.2. Specific Comments on the Draft 2 ISSC-MAP (Annex III)

For some components, a clear majority of respondents propose a similar action (e.g., to delete). For other components, there are contradictory and more-or-less equal actions proposed.

##### Simplification, reducing length, restructuring

- Numerous suggestions concerning restructuring – to reduce repetition, or expressing a different sense of priority relationships between elements of the standard (e.g., a proposal to combine Section III – collection practices and environmental impact / conservation measures – with Section II – principles on assessment, management planning, and monitoring – to create one section on sustainable resource management).
- Numerous comments point out unclear intent or confusing terminology.
- Proposals to simplify some parameters by providing simple rules (e.g., 7.4.1 – rate of production  $\geq$  rate of extraction; only vegetative parts can be collected; etc.)

##### Application and implementation

- Some of the proposed deletions reflect particular limitations or concerns related to regional conditions for implementation (e.g., government attitudes toward precaution; absence of government recognition of legal land tenure).
- Suggestions to make language more regionally relevant (e.g., inclusion of “tribal” along with “local communities” and “indigenous peoples” for South Asian context)
- Numerous questions concerning responsibility for collecting information or carrying out investigations and monitoring needed to verify compliance with criteria (e.g., in many countries there is no formal process in place to identify threatened plant species; who is responsible for undertaking this work in order to apply the relevant criteria in the current draft ISSC-MAP?).
- Numerous requests for additional guidance on methods for measuring, assessing, or monitoring parameters associated with the proposed criteria and indicators.
- One respondent suggests a greater separation (e.g., with different levels in the hierarchy of components) of “soft” and “hard” criteria, the former

defined as “social aspects and benefit transfer” and the latter defined as “technical measures for quality assurance”.

#### Criteria

- Performance aspects of some criteria need to be added to the way in which they are stated (e.g., 1.1, 1.2).
- Numerous proposals to expand or reduce the scope of some criteria (e.g., add “access” to 1.1; “tribal” to most of the criteria under Principle 2, Customary Rights)

#### Verification

- Traditional knowledge and rights are difficult to document and verify – more relevant means of verification should be listed and related guidance provided (e.g., verbally transmitted, videotaped, transcribed management rationale, description of adaptive management decisions and actions).
- Documentation recommended for verification (e.g. land title, permits) is often out of date, and therefore may not be an adequate indicator of legal land tenure and other criteria.
- Numerous suggestions address adding or altering the types of verification described or indicated to be more relevant to real situations.
- The notion of “awareness” as a means of verification was questioned: Does it equal “field inspection”? Moreover, does “field inspection” equal consultation and interviews at the collection site?
- Eliminating the absence of evidence (“no evidence of...”) as a means of verification was proposed.

#### Guidance

- One respondent proposed that guidance should be provided for all components of the standard (e.g., how to develop a management plan for a MAP wild collection operation), so that the standard can be used as a “how to” manual.
- Two respondents proposed that examples (e.g., of existing MAP sustainable wild collection management plans) be included with other guidance.
- Several respondents identified guidance that will need to be appropriate for different situations (e.g., substitution of plant parts collected, as a measure to reduce collection impacts, will not work in Germany, but may be feasible in other countries).

### 4.3. Glossary

There were numerous proposed corrections and additions to the glossary. Several respondents suggested that the term “botanicals” and its definition be removed.

### 4.4. References

Several respondents mentioned relevant additional references or examples.

## 5. Next steps

### 5.1. Recommended major revisions to the structure of the 2<sup>nd</sup> draft ISSC-MAP

- Simplify – accept proposed changes that reduce complexity and length
- Generalize – consolidate components (principles, criteria) that are broadly relevant to many situations
- Move indicators, verifiers, and other guidance into a supporting annex or companion document

### 5.2. Address major questions and concerns

- Is it possible to revise the current draft standard so that it is both more precise (more “how-to”), and simpler (easier to understand, more practical)?
- Should the standard concentrate on supporting collectors’ organizations and community-based enterprises? Or should it focus on larger-scale commercial operations involved in wild collection of MAPs? Can the standard address both?
- How much detail should be included in the standard itself, rather than in supporting documents (e.g., application and implementation manuals)?
- How can the standard provide for sufficient flexibility in requirements specified to enable application to/ implementation in different regions and field situations?
- Can the standard have different levels or degrees of implementation (e.g., minimum components required / maximum components desired)?
- How can the standard or supporting documentation address the relatively specialized topics that have come up as important in advisory group (e.g., ex situ conservation, infra-specific genetic diversity and genetic reserves, symbiotic relationships between species)?
- How can the standard more strongly support an adaptive management approach?

### 5.3. Other Important considerations for field consultations

- Determine whether proposed requirements (criteria, indicators and means of verification) are relevant to the project situation; propose alternatives that are more relevant and more practical.
- Determine whether information needed to evaluate proposed requirements is, or could be accessible and reliable.
- Identify requirements for which additional guidance is needed
- Identification of relevant stakeholders

- Identify the organization(s) able to oversee / take on responsibility for implementation of the standard (e.g., local organizations, government agencies, commercial enterprises or association, certifiers (organic, fair trade, forest management)).