



Forest Stewardship Council®



Interpretations of the normative framework

CHAIN OF CUSTODY

16 January 2018

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STANDARDS

FSC-STD-20-011 (V2-0) CHAIN OF CUSTODY EVALUATIONS

Code	INT-STD-20-011_04
Requirement (s)	Clauses 2.7 and 8.4
Publication date	21 November 2013
<p>Can an on-site audit exceptionally be replaced by a desk audit if the organization is located in a country or region with an actual demonstrated security risk for the life or health of auditors?</p> <p>In the case of a demonstrated security risk for the life or health of auditors, the CB may apply for derogation from PSU to replace an on-site audit by a desk audit. The application shall include:</p> <ul style="list-style-type: none"> a) Certificate code of the company; b) Activities under the scope of the certificate (products and processes); c) Evidences of security risks confirmed through verifiable public sources (e.g. an official travel warning); d) Other additional information, as required by FSC. <p>Derogation applications will be evaluated on a case by case basis.</p>	

Code	INT-STD-20-011_12 (also published under FSC-PRO-20-001 with code INT-PRO-20-001_01)
Requirement (s)	Clause 2.7d
Publication date	11 February 2016; amended 28 April 2016
<p>How are CBs required to verify that a certificate holder (CH) demonstrates its commitment to comply with the values of FSC as defined in the “Policy for the Association of Organizations with FSC” (FSC-POL-01-004)?</p> <p>CBs have to verify (audit) the CH's commitment to comply with the values of FSC as defined in the Policy for Association according to FSC-STD-40-004 V2-1 Clause 1.5.1. This needs to be done by evaluating the existence of a self-declaration signed by the CH (FSC-PRO-20-001 V1-1 Section 3).</p> <p>See also INT-PRO-20-001_02 for situations of evidenced infringements of the Policy for Association.</p>	

Code	INT-STD-20-011_14 (also published under FSC-PRO-20-001 with code INT-PRO-20-001_02)
Requirement (s)	Sections 1 and 3
Publication date	28 April 2016
<p>Shall the CB raise corrective action requests (CARs) to a CoC certificate holder (CH) if there is objective evidence for infringements of the Policy for Association?</p> <p>If the CB witnesses evidence of infringements of the FSC Policy for Association in the audit (FSC-PRO-20-001 V1-1 Section 1) or detects such evidence through other means such as by reviewing (evaluating) complaints, disputes or allegations of nonconformity</p>	

received from stakeholders (FSC-STD-20-011-V2-0 Clause 2.7d), the CB shall record the evidence for infringements in the audit report and alert FSC International about a potential non-compliance with the FSC Policy for Association for further evaluation.

The CB shall not raise CARs about infringements of the FSC Policy for Association to the CH as relevant conclusions are the subject matter of FSC International and require a decision by the international FSC Board of Directors.

If, however, the evidenced infringements of the Policy for Association also indicate nonconformities with applicable FSC certification requirements, the CB shall raise CARs accordingly.

Code	INT-STD-20-011_13
Requirement (s)	Clause 2.7d
Publication date	11 February 2016; amended 28 April 2016
<p>Does the requirement per FSC-STD-20-011 V2-0 Clause 2.7 d) to review “complaints, disputes or allegations of non-conformities received by the organization and/or the certification body” also apply to those related to infringements of the Policy for Association?</p> <p>1) Yes. Complaints, disputes or allegations of nonconformity received from stakeholders have to be reviewed by the certification body in all cases according to FSC-STD-20-011 V2-0 Clause 2.7.d. Further evaluation is only required if the review indicates that there is:</p> <ul style="list-style-type: none"> a) evidence of nonconformities of the CH with any FSC certification requirements applicable to the scope of certification; or b) a risk for nonconformities with applicable FSC certification requirements due to other activities of the organization (including non-certified entities or operations) that may affect the integrity of the chain of custody system, such as illegal timber trade, document forgery or product counterfeiting. <p>The CB shall record the complaint, dispute or allegation and any identified evidence for infringements of the Policy for Association in the audit or complaint investigation report and alert FSC International about a potential non-compliance with the FSC Policy for Association for further evaluation.</p> <p>Complaints received by the CH have to be reviewed in all cases according to ISO 65 Clause 15 for conformity with FSC-STD-20-001 V3-0. If they relate to nonconformity with applicable certification requirements in certified entities or operations, appropriate action must be taken by the CH and documented. Otherwise similar considerations apply as provided under point 1) above.</p>	

Code	INT-STD-20-011_02
Requirement (s)	Clause 2.7e
Publication date	23 April 2013
<p>Is it acceptable to audit loggers through desk audit when the logger does not have a log yard to visit?</p> <p>Yes. The desk audit is applicable to loggers holding a FSC Chain of Custody certificate and that do not have a log yard. The desk audit shall cover all applicable standard requirements of FSC-STD-40-004 V2-1, except the ones that only apply to COC certificates with physical</p>	

possession of products, namely Clauses 2.2, 3.4, 5.1, Part II (8 Percentage System, 9 Credit System) and Part IV. Evaluation against the standard requirements related to labeling of products are only required when the FSC label is used by the logger.

Code	INT-STD-20-011_09 (also published under FSC-STD-20-007 with code INT-STD-20-007_25)
Requirement (s)	Clause 4.3.2
Publication date	19 May 2014
<p>When a nonconformity is to be graded by the Certification Body, shall the attribute 'repeated' ('recurring') be applied at the level of a 5-year certification cycle or at the level of the full lifetime of a certificate?</p> <p>'Repeated' means that the same root because that already resulted in a minor nonconformity in a previous audit has been re-detected as a reason for a nonconformity in a following audit within the same 5-year certification period/cycle. This is usually indicated by a nonconformity with the same indicator / requirement than in a previous audit.</p>	

Code	INT-STD-20-011_05 (also published under FSC-STD-20-007 with code INT-STD-20-007_24)
Requirement (s)	Clause 4.5
Publication date	20 February 2014
<p>According to a PSU interpretation, surveillance evaluations shall take place at least once per calendar year for FM audits and at least once per calendar year, but not later than 15 months after the last audit for CoC audits.</p> <p>However, FSC-STD-20-007 and FSC-STD-20-011 require minor non-conformities in FM and CoC to be fully corrected within one year (under exceptional circumstances within two years in CoC).</p> <p>If there are outstanding minor non-conformities to be evaluated, shall a surveillance evaluation take place within the next 12 months to have the CAR closed?</p> <p>If an onsite surveillance evaluation is required to confirm the correction of the outstanding minor non-conformity, the audit shall take place within the 12-month period.</p> <p>If an outstanding minor non-conformity can be closed by evidence not requiring an onsite evaluation, the normal audit timelines can be followed.</p>	

Code	INT-STD-20-011_01
Requirement (s)	Clauses 4.5 and 4.6
Publication date	15 April 2011
<p>When does the given timeline commence for correction of non-conformities?</p> <p>The given timeline commences from the moment when the corrective action request is either formally accepted by or formally presented to the certificate holder (whichever happens first).</p>	

Code	INT-STD-20-011_08 (also published in FSC-PRO-20-003 with code INT-PRO-20-003_02)
Requirement (s)	Clause 4.6
Publication date	19 May 2014
<p>How does the status of open minor nonconformities not evaluated within the 12 months' timeframe affect the ability to transfer certificates to a new certification body?</p> <p>Minor nonconformities not evaluated by the preceding certification body within the required 12-months timeframe do not automatically upgrade to majors. The certificate may still be transferred to the succeeding certification body but the pending minor nonconformities shall be evaluated in the transfer audit and then be upgraded if not closed.</p>	

Code	INT-STD-20-011_10
Requirement (s)	Clause 5.11
Publication date	13 January 2015
<p>For a company to source Controlled Wood in areas that have been designated as 'unspecified risk' in a National Risk Assessment or risk assessment by a company, it must include the relevant Forest Management Units (FMUs) in its company verification program according to Annex 3 of FSC-STD-40-005 V2-1. FSC-accredited Certification Bodies are then required to conduct field verification to audit the performance of the company verification program.</p> <p>If an area is designated as 'unspecified risk' for risk assessment indicator 1.4 (relating to the perception of corruption), how would field verification by the FSC-accredited Certification Body check whether an FMU or supplier has been controlled for this indicator, and, would field verification be required when an area is designated as unspecified risk only for this indicator?</p> <p>Unspecified risk designations are relevant for the whole Controlled Wood category and not only for particular indicators. Requirements for the verification of unspecified risk areas as outlined in Annex 3 of FSC-STD-40-005 and in ADVICE-40-005-19 are relevant for Controlled Wood categories and do not contain indicators relevant for risk assessment. Therefore, the Certification Body's evaluation of verification programs in unspecified risk areas shall not focus on assessing conformance against risk assessment indicators and shall follow the relevant normative requirements.</p>	

Code	INT-STD-20-011_07
Requirement (s)	Clause 5.11
Publication date	13 May 2014
<p>Is a certification body required to conduct consultation with stakeholders while evaluating company compliance to Annex 3 of FSC-STD-40-005 FSC standard for company evaluation of controlled wood?</p>	

No, a certification body is not required to conduct consultation with stakeholders while evaluating company compliance to Annex 3 of FSC-STD-40-005. The company is required to conduct stakeholder consultation for relevant Categories of controlled wood and the certification body shall verify the company's compliance with standard requirements.

Code	INT-STD-20-011_06
Requirement (s)	FSC-STD-20-011 V2-0 Clause 5.12
Publication date	11 April 2014
<p>FSC-STD-40-005, Annex 3 sets the minimum sampling rate for certificate holders to apply when selecting FMUs for their Annex 3 controlled wood supplier verification program. FSC-STD-20-011 defines the equation that CBs are required to use when selecting from FMUs included in the supplier verification program.</p> <p>In cases where the certificate holder voluntarily decides to include a higher number of FMUs for field visits than is required by FSC-STD-40-005; is it acceptable for the CB to calculate their sample size on the minimum number required rather than the actual number of FMUs visited by the certificate holder?</p> <p>For example, certificate holder is required to include 35 FMUs, but they select to increase their sample size to 60. Is the CB required to sample 5 FMUs ($0.8 * \sqrt{35}$) or 7 FMUs ($0.8 * \sqrt{60}$)?</p> <p>FSC does not want to discourage certificate holders from electing to sample CW suppliers at higher rates.</p> <p>It is acceptable for the CB to base their sample size on the minimum number required to be included in the supplier field visits as per FSC-STD-40-005, Annex 3, 1.8., provided the CB has analyzed the reason(s) for extending the sampling rate by the certificate holder and the CB has come to the conclusion that the minimum sampling rate is sufficient to verify unspecified risk in the given conditions.</p> <p>In the example above, the CB would calculate their minimum sample size to be 5 FMUs.</p>	

Code	INT-STD-20-011_11
Requirement (s)	Clause 7.1
Publication date	05 October 2015
<p>FSC-STD-40-007 V2-0 Clause 4.1 sets out the sampling rate for organizations to apply when performing on-site audits of their suppliers included in their Supplier Audit Program. FSC-STD-20-011 V2-0 Clause 7.1 then defines the calculation for CBs to apply when selecting from those audited suppliers.</p> <p>In cases where the organization voluntarily decides to conduct a higher number of on-site audits of their suppliers than required, is it acceptable for the CB to calculate their sample size on the minimum number required rather than the actual number of suppliers visited by the organization?</p>	

FSC does not want to discourage organizations from electing to sample suppliers at higher rates.

It is acceptable for the CB to base their sample size on the minimum number required to be included in the supplier site audits as per FSC-STD-40-007 V2-0 Clause 4.1, provided that the CB has analyzed the reason(s) given by the organization for extending the sampling rate within their Supplier Audit Program and the CB has come to the conclusion that the minimum sampling rate is sufficient.

Code	INT-STD-20-011_03
Requirement (s)	Clause 8.2.f
Publication date	29 May 2013

FSC considers outsourcing across national borders to countries with Corruption Perception Index (CPI) lower than 50 as high risk activity. If a company based in China establishes an outsourcing agreement with another company situated in Hong Kong, is this situation considered as cross-border outsourcing?

Recognizing that Hong Kong is a Special Administrative Region of the People's Republic of China, FSC does not consider the outsourcing activity of a company based in Hong Kong to a company based in mainland China to be cross-board outsourcing in the context of FSC-STD-20-011 V2-0 Clause 8.2.f.

FSC-STD-20-011 (V3-0) CHAIN OF CUSTODY EVALUATIONS

Code	INT-STD-20-011_15
Requirement (s)	Definition „Scope of Chain of Custody certificates“; Definition „FSC certified product“ of FSC-STD-40-004 V2-1
Publication date	11 November 2016
<p>An FM/CoC organization has sold standing trees to a CoC organization <u>before</u> the certification of the FM/CoC organization is suspended or expired. Is the CoC certificate holder allowed to harvest the trees and consider the logs as FSC-certified?</p> <p>No, once the FM/CoC certification is suspended or expired the forest stand loses the FSC status, even if it has been sold already. The harvesting of standing timber is only allowed if covered by a valid FM certification. Thus the CoC certified organization, which has purchased the standing trees can not anymore claim the logs to be FSC certified.</p>	

Code	INT-STD-20-011_17
Requirement (s)	Section 6, Note
Publication date	27 September 2016
<p>1) Does a CB have to perform a stakeholder consultation for an organization sourcing material from an area classified as low risk through an FSC-NRA or FSC-CNRA?</p> <p>2) Does a CB have to perform a stakeholder consultation for all surveillance audits?</p> <p>1) No, a stakeholder consultation conducted by the CB is not mandatory.</p> <p>2) No, a stakeholder consultation conducted by the CB is mandatory only for initial FSC-STD-40-005 V3-0 audits and re-audits.</p>	

Code	INT-STD-20-011_16
Requirement (s)	Table B, Clause 2 e) and Footnote 6
Publication date	11 November 2016
<p>Shall Certification Bodies list all sub-sites of Single CoC certificates in the FSC database of certificates?</p> <p>No. In the case of Single CoC certificates, only the main site that holds the FSC chain of custody certificate shall be listed in the FSC database of certificates. Only participating sites of Multi-site and Group CoC certificates shall be listed in the FSC database.</p>	

FSC-STD-20-011 (V4-0) CHAIN OF CUSTODY EVALUATIONS

Code	INT-STD-20-011_18
Requirement (s)	Section 6, Note
Publication date	27 September 2016
<p>1) Does a CB have to perform a stakeholder consultation for an organization sourcing material from an area classified as low risk through an FSC-NRA or FSC-CNRA?</p> <p>2) Does a CB have to perform a stakeholder consultation for all surveillance audits?</p> <p>1) No, a stakeholder consultation conducted by the CB is not mandatory.</p> <p>2) No, a stakeholder consultation conducted by the CB is mandatory only for initial FSC-STD-40-005 V3-0 audits and re-audits.</p>	

Code	INT-STD-20-011_19
Requirement (s)	Clauses 2.6 e) and 3.2
Publication date	15 March 2017
<p>Can certification bodies conduct desk-audits to approve the transition of certificate holders from V2-1 to V3-0 of FSC-STD-40-004?</p> <p>Yes, except when there are elements of the standard that need to be verified on-site for the confirmation of certificate holder's conformity with the requirements. Desk audits for standards transition do not replace the need for annual surveillance audits, except when the requirements of Clause 2.6 e) and 3.2 of FSC-STD-20-011 V4-0 are met.</p>	

Code	INT-STD-20-011_20
Requirement (s)	FSC-STD-20-011 V4-0 Clause 4.8, Clause 6.2
Publication date	16 January 2018
<p>1. An organization is currently certified to FSC-STD-40-005 V2-1 and is planning to make the transition to V3-1. However, it is not currently sourcing controlled material and will not have purchases planned by the audit date. In such cases, can the transition audit to FSC-STD-40-005 V3-1 be conducted on the DDS they have in place prior to actual sourcing?</p> <p>2. If the transition audit can be conducted on the DDS prior to sourcing, is a follow up audit required after sourcing commences, to verify full implementation of the DDS? Further, is an additional audit required in situations where risk designation for the supply area changes from 'low' to 'specified/unspecified' risk?</p> <p>3. Is an additional audit required in situations where there is a change of the scope of the DDS by an organization between audits to source controlled material from new supply area?</p> <p>1. The transition audit to FSC-STD-40-005 V3-1 can be conducted on the DDS that the organization has in place prior to actual sourcing.</p>	

2. The occurrence of an additional audit after sourcing commences depends on the risk identified in the DDS:
 - a. If 'low risk' is identified in the risk assessment for the origin, and there is no risk of mixing within the DDS, no additional audit is required after sourcing commences.
 - b. If 'low' risk cannot be determined in the risk assessment for the origin, and/or there is risk of mixing, an additional audit is required.
 - c. In cases where there is a change in the risk designation of the supply area in a company risk assessment or an extended company risk assessment, the certification body is required to evaluate the DDS for relevance, adequacy and effectiveness and whether the organization has reviewed the risk assessment and made changes accordingly.


NOTE 1: The process of review of the DDS could involve an additional field audit, or the requirement may be satisfied with a desk audit. It is up to the certification body to decide, depending on the scope and scale of the organization's operations and the extent of change in the DDS.

NOTE 2: In regular cases (when the transition audit is performed on the implemented DDS and/or there is no sourcing from new supply areas in between the transition evaluation audits and subsequent surveillance audits), no additional audit is required when risk is identified as a result of newly approved FSC risk assessment.

3. Where there is a change of the scope of the DDS by an organization (between the transition audits and subsequent audits) to source controlled material from new supply areas, the occurrence of an additional audit depends on the risk designation of the new supply area:
 - a. If 'low risk' is identified in the risk assessment for the origin, and there is no risk of mixing relevant for the new supply area, no additional audit is required after sourcing from the new supply area commences.
 - b. If risk other than 'low' is identified in the risk assessment for the origin, and/or there is risk of mixing, relevant for the new supply area, an additional audit is required.

Code	INT-STD-20-011_21
Requirement (s)	FSC-STD-20-011 V4-0 Table B, FSC-STD-40-005 V3-1 2.1
Publication date	16 January 2018
Does the organization need to review potential suppliers not currently included in their DDS as part of the summary of the findings for field verification?	
<p>If the organization chose to exclude sites at the risk assessment stage, there is no requirement under FSC-STD-40-005 V3-1 to include this information in the summary of the DDS. Potential suppliers are not yet a part of the DDS. However, if field verification undertaken as a control measure resulted in one or more supply units, suppliers or sub-suppliers being excluded from the organization's DDS, this should be stated in the summary of the organization's findings required by FSC-STD-40-005 V3-1 sub-clause 6.2(d), as this is effectively a control measure taken to address identified risk.</p>	

Code	INT-STD-20-011_22
Requirement (s)	FSC-STD-20-011 V4-0 clause 6.2, FSC-STD-40-005 V3-1 Annex E
Publication date	16 January 2018



If the organization develops a control measure based on a desk evaluation, can the certification body apply evaluation of control measures at the forest level if the examples in Annex E Table B suggest that a field based control measure should have been developed?


FSC-STD-40-005 V3-1 Section 4 (Risk mitigation) does not specify the type of control measures that shall be established by the organization. FSC-STD-40-005 V3-1 Annex E is informative, and contains guidance and examples, not normative requirements. However, when field based control measures have been designed by the certification body in the system for evaluating the relevance, effectiveness, and adequacy of the DDS, according to Clause 6.2, then the certification body can apply evaluation of the control measures at the field level.

FSC-STD-40-003 (V2-1) CHAIN OF CUSTODY CERTIFICATION OF MULTIPLE SITES

Code	INT-STD-40-003_01
Requirement (s)	Clause 3.1
Publication date	23 November 2011
<p>How should a CB deal with the following scenario? A Participating Site of a Group CoC certification surpassed the defined threshold and the transitional membership phase of 2 years is coming to an end. In the meantime, the FSC National Office applied for nationally adapted eligibility.</p> <p>In this scenario FSC would exceptionally allow an extension of the transitional membership phase until FSC has taken a formal decision on the proposal for nationally adapted eligibility criteria submitted by the FSC National Office.</p>	

Code	INT-STD-40-003_03
Requirement (s)	Clause 3.1
Publication date	11 November 2016
<p>Is it acceptable that the total annual turnover of non-profit organizations offering sheltered workshops for disabled people and of prison workshops is calculated based on the sales of forest-based products rather than based on revenues of all goods and services?</p> <p>Yes, this is allowed. The national and international total annual turnover thresholds were calculated considering commercial activities of enterprises, not considering such types of non-profit organizations and prison workshops for prison labor.</p>	

Code	INT-STD-40-003_02
Requirement (s)	Clause 5.2.4
Publication date	13 February 2015
<p>According to Clause 5.2.4, for certificates with more than 20 Participating Sites and where the Participating Sites are not linked through common ownership, the Central Office's auditors shall be in possession of a formal ISO 9001, ISO 14001 or OHSAS 18001 lead auditor certificate achieved through a recognized accredited training course. Is there an alternative solution for the qualification of Central Office's auditors?</p> <p>Yes, training provided by FSC-accredited certification bodies or training organizations recognized by FSC satisfies the requirements of Clause 5.2.4 alternatively, provided the following conditions are met:</p> <ul style="list-style-type: none"> • The training includes an equivalent of a 3-days ISO 19011 training course (incl. exam) provided by a formally qualified QMS, EMS or OHSAS lead auditor. • If the training is provided by an FSC-accredited certification body through an in-house 	



trainer:

- The training course agenda and course material needs to be approved by ASI in advance.
- ASI must be given the right to witness the implementation of trainings at its sole discretion.

NOTE: The certification body should carefully consider and address potential conflicts of interest.

FSC-STD-40-004 (V2-1) FSC STANDARD FOR CHAIN OF CUSTODY CERTIFICATION

Code	INT-STD-40-004_20
Requirement (s)	Scope
Publication date	13 February 2015
<p>Is it allowed to classify wood-based resin adhesives and lignin sulfonate used for sizing in paper production as “neutral”?</p> <p>Yes, until FSC has developed an approach to verify this type of NTFP material it is acceptable to classify such material as “neutral”.</p> <p>NOTE: “Neutral” means that this material is exempt from Chain of Custody control requirements.</p>	

Code	INT-STD-40-004_30
Requirement (s)	A Scope; INT-STD-40-004_03
Publication date	11 November 2016
<p>Are logistics companies expected to be covered by an outsourcing agreement, if there is risk that FSC certified material is mixed with non-FSC material during transport or temporary storage?</p> <p>Yes, in such cases the logistics companies need to be covered by an outsourcing agreement in accordance with the requirements of section 12 of FSC-STD-40-004.</p>	

Code	INT-STD-40-004_21
Requirement (s)	Definition FSC claim
Publication date	10 June 2015
<p>Do FSC claims need to be spelled in sales documents as they are spelled in the COC standard FSC-STD-40-004?</p> <p>The standard is not prescriptive about how the FSC claims should be spelled in sales documents. Therefore, only the 'FSC' acronym needs to be written in capital letters in FSC claims. The certified content specification (e.g. 100%, Mix Credit, Recycled 85%) may be spelled in lower case and/ or upper case (e.g. both FSC Mix Credit and FSC MIX CREDIT).</p>	

Code	INT-STD-40-004_19 (also published under FSC-STD-40-006 with code INT-STD-40-006_04)
Requirement (s)	Section E
Publication date	05 September 2014

Do the terms FSC-pure and FSC-mixed still apply?

No, the terminology for claims was updated in FSC-STD-40-004 V2-1. FSC-pure is now referred to as FSC 100%; FSC-mixed as FSC Mix.

Code	INT-STD-40-004_02
Requirement (s)	N/A
Publication date	01 February 2011

Can an industry use old coconut palm trees from plantations as recycled wood?

Coconut fibre is not considered as wood since it is a palm-derived material, despite of its similar commercial and functional properties compared to material from trees. This conclusion is based on the botanical definition that wood is an organic material produced by Dicots species and palms pertain to Monocots group of plants. FSC considers this material as a non-timber forest product where it originates from forests and as non-forest based material where it originates otherwise. The certification of coconut fibre would be possible in case that the material is produced in a forest based system (native forest or plantations). Therefore, palms produced from other land use systems are not subject to FSC certification and their material can be included in FSC certified products as non-forest based material. Also, this material is not eligible to be certified as FSC Recycled, since FSC considers the use of this material as a primary use of the palm trunks and, to be post-consumer reclaimed, it should be necessarily reclaimed from consumers.

Code	INT-STD-40-004_25
Requirement (s)	Clause 1.4.2
Publication date	24 July 2015

Are organizations required to keep records of both supplier invoices and delivery documents (where available)?

Organizations need to keep sales documents as key records (documents showing the transfer of ownership). Where available, these shall be the invoices. It is not required to keep multiple sales documents of the same transaction. Legal obligations for record keeping remain unaffected.

Code	INT-STD-40-004_23
Requirement (s)	Clause 2.1.1
Publication date	24 July 2015

Can a COC certificate holder establish a product group list that includes products that are not eligible to be sold with an FSC claim?

No, Clause 2.1.1 of FSC-STD-40-004 V2-1 specifies that organizations shall establish product groups for the products that will be sold with FSC claims. Therefore, FSC product groups shall only include products that are eligible to be sold with FSC claims.

Code	INT-STD-40-004_05
Requirement (s)	Clause 2.1.2b
Publication date	15 April 2011

Is it acceptable to switch between credit and percentage control systems in a product group? For example, an organization uses the percentage system, but when the end of the claim period comes, they have not obtained enough input volume to reach the labelling threshold of 70%. Then they switch to the credit system and sell a volume of FSC Mixed Credit material equal to the Mixed XX% calculation.

No, the organization cannot have two systems of control for the same product group and switch from one to another ad libitum. In a situation where the organization cannot reach the minimum threshold for labelling, the products can still be claimed as FSC certified on invoices informing the applicable FSC percentage (e.g. FSC Mixed 45%), but the FSC label shall not be applied.

However, an organization may decide to permanently switch from one control system to another by defining a new product group. In this case the following shall apply regarding remaining eligible material:

1. from the percentage to the credit system: the organization may enter in its credit account an input equivalent to the volume of FSC Mixed x% output resulting from the last claim period or job order that was not sold under the percentage system.
2. from credit to percentage system: the remaining credits from the credit account cannot be used as input for the percentage system.

Code	INT-STD-40-004_09
Requirement (s)	Clause 2.1.3
Publication date	18 April 2011

Is it acceptable to define credit system product groups by FSC claim and product type only, with no regard to input characteristics?

For example, a door manufacturer produces the following door types:

- a) Solid wood door – sawn material components, dowels as minor components
- b) Sandwich door Type 1 – sawn material components, veneer, skins, chip board
- c) Sandwich door Type 2 – sawn material components, veneer, fiber board, chip board, honey comb

Could they define one product group (FSC Mixed Credit doors) and use one credit account for all of these door types?

No, product groups under the credit system shall share similar input and output characteristics, in terms of quality and conversion factor, as defined in FSC-STD-40-004

Clause 2.1.3 and “Terms and Definitions”. The term “quality” represents characteristics in terms of species, composition/ specifications or value of the materials. It means that products that contain inputs of different quality (e.g. sawn wood and fiber board) and/or with different conversion factors (e.g. solid wood and sandwich door) cannot be combined in the same product group. Credits from materials of a certain quality (e.g. chip board) cannot be transferred to materials of different quality (e.g. veneer). Thus, the credit system is not applicable for the production of products composed by materials of different “qualities”, unless the organization establishes separate credit accounts for each input material.

Code	INT-STD-40-004_10
Requirement (s)	Clause 3.1.2
Publication date	15 August 2011
<p>Is PEFC certified material eligible to be used in FSC product groups as FSC certified or FSC Controlled Wood?</p> <p>No. Material certified by the Program for Endorsement of Forest Certification (PEFC) is not accepted as FSC certified input and does not automatically meet the requirements of the FSC Controlled Wood standards. Therefore, PEFC certified material classifies as non-FSC certified input and must comply with FSC Controlled Wood standards before its use in FSC product groups.</p>	

Code	INT-STD-40-004_26
Requirement (s)	Clause 4.1
Publication date	05 October 2015
<p>Can a product that is invoiced simultaneously containing FSC claims and claims of another forestry certification scheme (such as PEFC or SFI) be considered as FSC certified input by the buyer?</p> <p>Yes. However, in the case the buyer is certified against FSC and another forestry certification scheme, the buyer shall provide its FSC Certification Body access to both production and certification controls (access to both FSC and e.g. PEFC or SFI credit accounts) for verification that the volumes received are not being double counted. This requirement also applies in cases where the FSC accredited Certification Body is not accredited for certification against the other forestry certification scheme.</p> <p>Amended on 05.10.2015; First published on 06.08.2012</p>	

Code	INT-STD-40-004_28
Requirement (s)	4.1.1
Publication date	01 July 2016

In some cases, the verification of supplier invoice and support documentation is not possible or feasible on receipt of material or prior to further use. In these cases, is there any alternative for companies to meet the requirement of Clause 4.1.1?

Yes. The intended outcome of this requirement is that organizations ensure that only eligible inputs are used in FSC product groups and that any incorrect claims on suppliers' documentation are identified before the organization sells materials or products with FSC claims. Organizations that have a system in place that ensures that these objectives are met may be considered as in conformity with this requirement.

Code	INT-STD-40-004_18
Requirement (s)	Clauses 4.1.1; 6.1.1; 6.1.2
Publication date	19 May 2014
<p>Where non-certified organizations that are not required to be certified are involved in issuing sales or delivery documents (e.g. transporting companies, sub-contractors, 'del credere' agents), is it acceptable that only the invoice or the delivery document is used to identify inputs and outputs sold with FSC claims?</p> <p>Yes, non-certified organizations shall not use the certification code of certified organizations in their own documents. In these exceptional cases it is sufficient that only the sales or delivery document issued by the certified organization contains all information as specified in Clause 6.1.1 and is used to identify inputs and outputs sold with FSC claims. The document issued by the non-certified organization shall contain sufficient information to link the sale and related delivery documentation to each other.</p>	

Code	INT-STD-40-004_14 (also published under FSC-STD-20-007 with code INT-STD-20-007_11)
Requirement (s)	Clause 5.2
Publication date	06 February 2012
<p>We are aware that where a main assessment had been carried out for a CoC certificate, the client may, after the certificate had been issued, sell the certified timber products that were in stock at the time of the main assessment, as certified. My first question relates to the CoC aspect of this, i.e. does this also mean the client may sell all certified timber products purchased between the time of the main assessment and the date the certificate is issued, as certified, after the certificate had been issued?</p> <p>This brings me to the FM situation, i.e. would this same rule apply for FM certification? If the rule does apply, does this mean that any standing stock that is felled in the period between the main evaluation and the date the certificate is issued, may then be sold as certified after the certificate had been issued?</p> <p>The answer to the first question is Yes, according to FSC-STD-40-004 V2-1, which states:</p> <p>Organizations in the certification process may use towards their input calculations material held in their stock at the time of the main assessment as well as material received between the date of the main assessment and the issue date of the organization's FSC Chain of</p>	

Custody certificate. However, the organization may not sell any material with FSC claims prior to holding an FSC Chain of Custody certificate.

The answer to the second question is also Yes, with the conditions specified in FSC-STD-20-007:

In the case of joint Forest Management and Chain of Custody certification, timber that had been felled prior to the issue of a certificate, but which has not yet been sold by the forest management enterprise may be sold as certified if it was felled in the same calendar year or harvesting period and if the main evaluation did not reveal any major nonconformity.

Code	INT-STD-40-004_24
Requirement (s)	Clause 6.1.1
Publication date	24 July 2015
Is an organization allowed to include the FSC Chain of Custody code of its supplier on the invoice, in addition to its own code?	
Yes, but it must be clear which code belongs to the organization issuing the invoice and which is the suppliers' code.	

Code	INT-STD-40-004_17
Requirement (s)	Clause 6.1.1
Publication date	19 May 2014
Are certified or non-certified subcontractors allowed to include the certificate code of the contracting certified organization in their own sales and delivery documentation?	
No, organizations can only use their own certificate code in their sales and delivery documentation, not the certificate code of another certified organization.	

Code	INT-STD-40-004_16
Requirement (s)	Clause 6.1.1
Publication date	23 April 2013
Is the FSC Mix 100% claim allowed?	
Yes, the FSC Mix 100% claim is allowed on sales and delivery documents only. Although the FSC Mix 100% claim is accepted it is recommended to use the FSC Mix Credit claim instead. For labelling of these products, the FSC Mix label shall be used.	

Code	INT-STD-40-004_12
Requirement (s)	6.1.1f
Publication date	05 September 2011

In some countries, self-billing Invoices (SBIs) prepared by the purchaser are a substitute document for an invoice by the seller. It is acceptable that the purchaser uses the certification code of the seller in SBIs?

Yes. As SBIs represent a long established business practice in the forestry industry and fully accepted by the tax authorities, it is acceptable that purchaser uses the certification code of the seller, or includes both the seller's and the purchaser's certification code in SBIs.

Code	INT-STD-40-004_08 (also published under FSC-DIR-40-004 with code INT-DIR-40-004_01)
Requirement (s)	Clause 6.1.1
Publication date	18 April 2011

Is it acceptable that the FSC Claims are abbreviated (e.g. FSC Mix Cred) due to space constraints in invoices?

Yes, with the condition that:

- a) The abbreviation of FSC Claims is clearly defined in the organization's documented procedures, and
- b) The complete FSC claim is provided to customers through supplementary evidence, as defined in ADVICE-40-004-05 of FSC-DIR-40-004.

Code	INT-STD-40-004_07
Requirement (s)	Clause 6.1.1
Publication date	18 April 2011

In which language shall the FSC claims on sales and delivery documents be written?

The FSC Claims on sales and delivery documents shall be written in English in the case of international sales. However, it is acceptable that the FSC Claim is translated to the other languages in the case of sales at national level (e.g. when both supplier and customer are located in the same country) or when the official language in the country of the supplier and customer is the same.

Code	INT-STD-40-004_06
Requirement (s)	Clause 6.1.1
Publication date	15 April 2011

Is it acceptable that a product sold with a FSC claim also contains claims of other forestry conformity assessment schemes in its sales and delivery documents?

Yes. The FSC Chain of Custody and Trademark standards only present restrictions for the use of the FSC label on products together with the label of other forestry conformity assessment schemes. However, these restrictions do not apply for the identification of sales and delivery documents. In this case, the FSC claims and claims of other certification

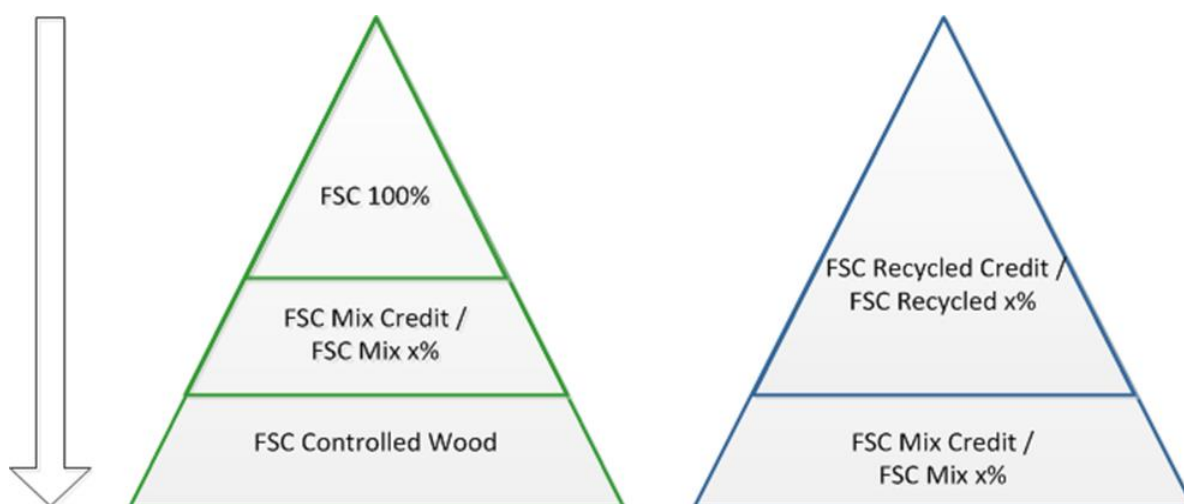
schemes shall not be merged. All elements of the FSC claim must be comprehensible and easily identifiable.

Code	INT-STD-40-004_22
Requirement (s)	Clause 6.1.1g
Publication date	24 July 2015

Is it possible to downgrade an FSC output claim?

Yes, the following FSC output claims may be downgraded in any of the three systems for controlling FSC Claims (Transfer, Percentage and Credit System) as presented in the diagram below. In all cases, the FSC label shall correspond to the FSC claim made on sales documents.

NOTE: FSC Recycled products cannot be downgraded to FSC Controlled Wood since they do not meet FSC Controlled Wood requirements.



Code	INT-STD-40-004_27
Requirement (s)	Clause 6.2.1
Publication date	14 December 2015

Are certified retailers buying and selling finished and labelled FSC products allowed to downgrade output claims?

Yes, retailers may do so. In such cases it is acceptable that the FSC claims on sales and delivery documentation do not correspond to the FSC claims on the labelled products.

NOTE: This approach aims to facilitate application of the standard to retailers selling finished and labelled products to end-consumers that often only receive standardized receipts at the cash point. Clause 6.2.1 was not developed for organizations directly selling to end consumers.

Code	INT-STD-40-004_11
Requirement (s)	Clause 6.2.1 and Scope
Publication date	05 September 2011
<p>According to FSC-STD-40-004 V2-1, publishers and retailers are not required to be certified in order to resell FSC finished products, unless they perform at least one of the following activities:</p> <p>a) Pass on the FSC Claim to subsequent customers through sales and delivery documents;</p> <p>b) Apply the FSC label on-product;</p> <p>c) Process or transform FSC certified products (e.g. manufacturing, repackaging, relabeling, adding other forest-based components to the product).</p> <p>However, some companies that don't need certification are FSC certified in order to demonstrate their commitment to the FSC certification principles and values. In this context, are certified publishers and retailers required to comply with Clause 6.2.1 of FSC-STD-40-004 V2-1 if they sell finished certified products to customers that don't need or want to receive the invoices with FSC Claims on it?</p> <p>No, for certified publishers and retailers that sell finished certified products to customers that don't need or want to receive the invoices with FSC Claims on it, Clause 6.2.1 may be classified as not being applicable.</p>	

Code	INT-STD-40-004_29
Requirement (s)	Clause 6.3.1
Publication date	01 July 2016
<p>Clause 6.3.1 of FSC-STD-40-004 V2-1 requires organizations to ensure that the sale of FSC Controlled Wood is in conformity with Part 4 of FSC-STD-40-005 V2-1. Now that V3-0 of FSC-STD-40-005 is not applicable for those organizations who purchase FSC Controlled Wood and wish to resell it as such, are they still required to conform to Clause 6.3.1 and consequently Part 4 of FSC-STD-40-005 V2-1 until the next version of FSC-STD-40-004 (V3-0) is released?</p> <p>No, for these organizations Clause 6.3.1 is no longer applicable. The same requirements are still applicable to these CoC certificate holders, but they are covered by other requirements as specified in INT-STD-40-005_20.</p>	

Code	INT-STD-40-004_15
Requirement (s)	Clause 7.3.1
Publication date	23 April 2013; amended 10 March 2016

Which output claim shall be used when inputs with different FSC claims are combined in the Transfer System?

The below table presents the possible combinations of FSC input claims and resulting output claims when applying the Transfer System.

Inputs	FSC 100%	FSC Mix Credit	FSC Mix x%	FSC Recycled Credit	FSC Recycled x%	Pre-cons. reclaimed wood	Pre-cons. reclaimed paper	Post-cons. reclaimed wood and paper	FSC Controlled Wood
FSC 100%	FSC 100%	FSC Mix Credit	FSC Mix x%	FSC Mix Credit	FSC Mix x%	No FSC claims are allowed	FSC Mix 100%	FSC Mix 100%	FSC Controlled Wood
FSC Mix Credit	FSC Mix Credit	FSC Mix Credit	FSC Mix x%	FSC Mix Credit	FSC Mix x%	No FSC claims are allowed	FSC Mix Credit	FSC Mix Credit	FSC Controlled Wood
FSC Mix x%	FSC Mix x%	FSC Mix x%	FSC Mix x%	FSC Mix x%	FSC Mix x%	No FSC claims are allowed	FSC Mix x%	FSC Mix x%	FSC Controlled Wood
FSC Recycled Credit	FSC Mix Credit	FSC Mix Credit	FSC Mix x%	FSC Recycled Credit	FSC Recycled x%	No FSC claims are allowed	FSC Recycled Credit	FSC Recycled Credit	FSC Controlled Wood
FSC Recycled x%	FSC Mix x%	FSC Mix x%	FSC Mix x%	FSC Recycled x%	FSC Recycled x%	No FSC claims are allowed	FSC Recycled x%	FSC Recycled x%	FSC Controlled Wood
Pre-cons. reclaimed wood	No FSC claims are allowed	No FSC claims are allowed	No FSC claims are allowed	No FSC claims are allowed	No FSC claims are allowed	No FSC claims are allowed	No FSC claims are allowed	No FSC claims are allowed	No FSC claims are allowed
Pre-cons. reclaimed paper	FSC Mix 100%	FSC Mix Credit	FSC Mix x%	FSC Recycled Credit	FSC Recycled x%	No FSC claims are allowed	FSC Recycled 100%	FSC Recycled 100%	FSC Controlled Wood
Post-cons. reclaimed wood and paper	FSC Mix 100%	FSC Mix Credit	FSC Mix x%	FSC Recycled Credit	FSC Recycled x%	No FSC claims are allowed	FSC Recycled 100%	FSC Recycled 100%	FSC Controlled Wood
FSC Controlled Wood	FSC Controlled Wood	FSC Controlled Wood	FSC Controlled Wood	FSC Controlled Wood	FSC Controlled Wood	No FSC claims are allowed	FSC Controlled Wood	FSC Controlled Wood	FSC Controlled Wood


Code	INT-STD-40-004_13
Requirement (s)	Clause 9
Publication date	01 December 2011
<p>Are traders authorized to apply the credit system for trading of unfinished products?</p> <p>Traders can apply the credit system on the level of a trading office site under the following conditions:</p> <ol style="list-style-type: none"> 1) For the trade of primary products (e.g. logs, chips), and 2) Exclusive for domestic trading (at national level), and 3) There shall be a recognized third party measuring and control system of the forest products in place in order to ensure compliance with FSC product group definition (especially Clause 2.1.3), and 	

4) The trade of FSC certified products is always linked to a physical delivery of products. Virtual transfers of certified products are prohibited.

Code	INT-STD-40-004_04
Requirement (s)	Section 12
Publication date	15 April 2011
<p>Are FSC outsourcing requirements applicable in the following situation: A subcontractor runs a scaling operation (scale house), which is located on-site at the FSC certified company's property?</p> <p>No, outsourcing requirements are only applicable when the subcontractor takes physical possession of FSC certified material, off-site from a FSC certified organization. If a subcontracted activity occurs on-site at a FSC certified organization, then the activity shall be included in the certificate scope and evaluated as part of the organization's CoC audit.</p>	

Code	INT-STD-40-004_03
Requirement (s)	Clause 12.1.1
Publication date	01 February 2011
<p>A FSC pulp producer ships its finished bales of pulp to a warehouse where it sits awaiting loading into ships or rail cars. The company does not relinquish ownership and the product is not altered in any way from the time it leaves the company facility to the warehouse and then into the ship or train. Is the process of warehousing considered outsourcing?</p> <p>Storage sites should be exempt from CoC evaluations where they constitute 'stopping places' or intersections only as part of transport agreements between two Chain of Custody operations. In other words, where certain storage facilities are used (or rented) by transport service providers to fulfill a contractual agreement between two CoC certified operations, such sites should not be considered part of an outsourcing agreement. Where, however, a CoC operation contracts a transport service provider or the warehouse owner to store goods in the absence of an agreed delivery to a customer (and would then only place a delivery order at a later point in time, once a sales contract has been signed), such a scenario should be considered an extension of the storage site of the CoC operation and justify to look at it as an outsourcing arrangement.</p>	

Code	INT-STD-40-004_01
Requirement (s)	Clause 12.1.1a
Publication date	01 February 2011
<p>A printer outsources part of its production to a non-FSC certified contractor. Can the contractor buy FSC paper and add it to an outsourced production?</p> <p>No, non-certified outsourcing contractors cannot buy and add forest-based material on their own, as per definition the contracting organization would not have ownership of all input</p>	



materials. This would be different for certified contractors where they both act as contractors as well as suppliers with a purchase function on their own.

FSC-STD-40-004 (V3-0) CHAIN OF CUSTODY CERTIFICATION

Code	INT-STD-40-004_31
Requirement (s)	Clause 10.5
Publication date	15 March 2017
Clause 10.5 of FSC-STD-40-004 V3-0 contains a reference to high-quality components. How is quality defined in this case?	
In the context of this clause, the following criteria define quality:	
<ul style="list-style-type: none">• All products that are made of chip and particles of wood are considered as having the same quality;• Solid wood components are considered as having a higher quality than components of chip and particles of wood;• Solid hardwood is considered as having higher quality than softwood.	

Code	INT-STD-40-004_32
Requirement (s)	Clause 5.6
Publication date	08 September 2017
Clause 5.6 specifies that organizations may only sell products with the ‘FSC Controlled Wood’ claim to customers that are FSC certified. Are certificate holders also allowed to sell FSC Controlled Wood to project applicants according to FSC-STD-40-006?	
Yes. Since FSC Controlled Wood is an eligible input in project certification, CoC certificate holders can sell products with FSC Controlled Wood claims on sales documents to FSC project applicants.	

Code	INT-STD-40-004_33
Requirement (s)	Clause 12.5
Publication date	08 September 2017
Clause 12.5 requires organizations to provide documented procedures to their outsourcing contractors. Is this requirement applicable when the contractor is FSC certified and has included outsourcing activity in its certificate scope?	
No. Clause 12.5 is only applicable in the case of non FSC-certified contractors.	

Code	INT-STD-40-004_34
Requirement (s)	Clause 14.1 b
Publication date	08 September 2017
Do the “common operational procedures” specified in Clause 14.1 b have to cover procedures that go beyond those related solely to certification?	
Yes. The term “common operational procedures” should not be confused with “common certification procedures”. The standard provides some examples of common operational procedures, such as same production methods, same product specifications, same integrated management software, which go beyond those related solely to FSC certification.	

Code	INT-STD-40-004_35
Requirement (s)	Clause 1.6
Publication date	08 September 2017
<p>How should an FSC-certified organization proceed if a supplier notifies that certain products delivered to the organization are non-conforming products? Shall the organization also apply the non-conforming procedures, even if the non-conformity was caused by a supplier?</p> <p>Yes. Once an FSC-certified organization is aware that a certain product received does not conform to certification requirements, it shall treat such products as non-conforming inputs and apply the requirements specified in Clause 1.6 of FSC-STD-40-004 V3-0 ensuring that they are not sold as being FSC certified.</p>	

Code	INT-STD-40-004_36
Requirement (s)	Clause 7.2, NOTE
Publication date	08 September 2017
<p>The Note under Clause 7.2 specifies that different types of wood pulp are considered as equivalent input materials. Does this mean that virgin and reclaimed wood fibre are considered as equivalent input materials and can be substituted in FSC credit accounts?</p> <p>No. Virgin and reclaimed wood fibre are not considered as equivalent input materials and therefore cannot be substituted in FSC credit accounts. There are references in the CoC standard that make a distinction between virgin and reclaimed materials (see Note under Clause 5.9, Table D, definitions of FSC Mix and FSC Recycled), indicating that they are not equivalent materials. They can be combined in the same credit account in the case of products that are made with both materials (mixed fibres). However, for 100% recycled products, the FSC credit shall only be taken from the reclaimed input materials. The same applies to 100% virgin fibre products, where the credits shall only be taken from virgin input materials.</p>	

FSC-STD-40-006 (V1-0) FSC CHAIN OF CUSTODY STANDARD FOR PROJECT CERTIFICATION

Code	INT-STD-40-006_03 (also published under FSC-STD-40-007 with code INT-STD-40-007_02)
Requirement (s)	Clauses 2.3; 5.4d; 6.2; 6.3; 7.2; 8.3; 8.5; 9.1d; 9.2.
Publication date	05 September 2014
<p>Do we need to apply <i>FSC-STD-40-007 Sourcing reclaimed material for use in FSC Product Groups or FSC Certified Projects</i> when assessing reclaimed material for use under project certification?</p> <p>Yes, FSC-STD-40-007 shall be applied to purchase, verify and classify reclaimed forest-based inputs for use in FSC Certified Projects. This mainly applies to the following clauses of FSC-STD-40-006:</p> <p>2.3, 5.4d, 6.2, 6.3, 7.2, 8.3, 8.5, 9.1d, 9.2.</p>	

Code	INT-STD-40-006_01
Requirement (s)	Clause 9.2.b
Publication date	07 August 2012
<p>Are project certification applicants allowed to implement a controlled wood verification program according to FSC-STD-40-005 and source controlled materials for the project?</p> <p>Yes. Project certification applicants are allowed to implement a controlled wood verification program according to FSC-STD-40-005.</p>	

Code	INT-STD-40-006_02
Requirement (s)	Part 4
Publication date	05 September 2014
<p>Do we need to apply <i>FSC-STD-50-001 Requirements for use of the FSC trademarks by Certificate Holders</i> for project certification?</p> <p>Yes, for use of the FSC trademarks FSC-STD-50-001 shall be applied. Requirements of Annex 2 of FSC-STD-50-001 replace requirements of Part 4 of the project certification standard (FSC-STD-40-006).</p>	

Code	INT-STD-40-006_04 (also published under FSC-STD-40-004 with code INT-STD-40-004_19)
Requirement (s)	Annex 1
Publication date	05 September 2014
<p>Do the terms FSC-pure and FSC-mixed still apply?</p> <p>No, the terminology for claims was updated in FSC-STD-40-004 V2-1. FSC-pure is now referred to as FSC 100%; FSC-mixed as FSC Mix.</p>	

FSC-STD-40-007 (V2-0) SOURCING RECLAIMED MATERIAL FOR USE IN FSC PRODUCT GROUPS OR FSC CERTIFIED PROJECTS

Code	INT-STD-40-007_02 (also published under FSC-STD-40-006 with code INT-STD-40-006_03)
Requirement (s)	Scope
Publication date	05 September 2014
<p>Do we need to apply <i>FSC-STD-40-007 Sourcing reclaimed material for use in FSC Product Groups or FSC Certified Projects</i> when assessing reclaimed material for use under project certification?</p> <p>Yes, FSC-STD-40-007 shall be applied to purchase, verify and classify reclaimed forest-based inputs for use in FSC Certified Projects. This mainly applies to the following clauses of FSC-STD-40-006:</p> <p>2.3, 5.4.d), 6.2, 6.3, 7.2, 8.3, 8.5, 9.1.d), 9.2.</p>	

Code	INT-STD-40-007_01
Requirement (s)	Clause 3.5
Publication date	07 August 2012
<p>Companies that use post-consumer reclaimed material inputs may identify small amount of pre-consumer contamination in the material bundle on receipt. Does this material count as a mixture of pre- and post-consumer reclaimed material and therefore require the supplier to be included in a supplier audit program as per clause 3.5 of FSC-STD-40-007 V2-0?</p> <p>Where sporadically the buyer of post-consumer material identifies a small amount of unintentional pre-consumer contamination included in the shipment, this is not considered a mix of pre- and post-consumer reclaimed material as described in clause 3.5 of FSC-STD-40-007 V2-0. In this case, the company shall quantify the amount of pre-consumer material contamination and deduct this amount from the post-consumer volume.</p>	

Code	INT-STD-40-007_03
Requirement (s)	Clause 4.3
Publication date	08 September 2017
<p>Is it acceptable for an organization to purchase a manufactured component of a product (e.g. paper bag handle) or manufactured products made of reclaimed material and to include the manufacturers of the components or products in the supplier audit program?</p> <p>No, organizations are not allowed to include manufacturers in the supplier audit program. Manufacturers of reclaimed products or product components need to obtain CoC certification.</p>	

PROCEDURES

FSC-PRO-20-001 (V1-1) EVALUATION OF THE ORGANIZATION'S COMMITMENT TO FSC VALUES AND OCCUPATIONAL HEALTH AND SAFETY IN THE CHAIN OF CUSTODY

Code	INT-PRO-20-001_01 (also published under FSC-STD-20-011 with code INT-STD-20-011_12)
Requirement (s)	Sections 1 and 3
Publication date	11 February 2016; amended 28 April 2016
<p>How are CBs required to verify that a certificate holder (CH) demonstrates its commitment to comply with the values of FSC as defined in the “Policy for the Association of Organizations with FSC” (FSC-POL-01-004)?</p> <p>CBs have to verify (audit) the CH's commitment to comply with the values of FSC as defined in the Policy for Association according to FSC-STD-40-004 V2-1 Clause 1.5.1. This needs to be done by evaluating the existence of a self-declaration signed by the CH (FSC-PRO-20-001 V1-1 Section 3).</p> <p>See also INT-PRO-20-001_02 for situations of evidenced infringements of the Policy for Association.</p>	

Code	INT-PRO-20-001_02 (also published under FSC-STD-20-011 with code INT-STD-20-011_14)
Requirement (s)	Sections 1 and 3
Publication date	28 April 2016
<p>Shall the CB raise corrective action requests (CARs) to a CoC certificate holder (CH) if there is objective evidence for infringements of the Policy for Association?</p> <p>If the CB witnesses evidence of infringements of the FSC Policy for Association in the audit (FSC-PRO-20-001 V1-1 Section 1) or detects such evidence through other means such as by reviewing (evaluating) complaints, disputes or allegations of nonconformity received from stakeholders (FSC-STD-20-011-V2-0 Clause 2.7d), the CB shall record the evidence for infringements in the audit report and alert FSC International about a potential non-compliance with the FSC Policy for Association for further evaluation.</p> <p>The CB shall not raise CARs about infringements of the FSC Policy for Association to the CH as relevant conclusions are the subject matter of FSC International and require a decision by the international FSC Board of Directors.</p> <p>If, however, the evidenced infringements of the Policy for Association also indicate nonconformities with applicable FSC certification requirements, the CB shall raise CARs accordingly.</p>	

DIRECTIVES

FSC-DIR-40-004 DIRECTIVE ON CHAIN OF CUSTODY CERTIFICATION

Code	INT-DIR-40-004_05
Requirement (s)	ADVICE-40-004-03
Publication date	19 May 2014
<p>May the claim “registered” for chip and fibre components of product groups with a reduced labelling threshold of 50% be passed on along several organizations of a supply chain?</p> <p>Yes, the claim “registered” may be passed on according to the requirements of Advice 3 of ADVICE-40-004-03 together with the “registered” material / products.</p>	

Code	INT-DIR-40-004_01 (also published in FSC-STD-40-004 with code INT-STD-40-004_08)
Requirement (s)	ADVICE-40-004-05
Publication date	18 April 2011
<p>Is it acceptable that the FSC Claims are abbreviated (e.g. FSC Mix Cred) due to space constraints in invoices?</p> <p>Yes, with the condition that:</p> <ul style="list-style-type: none">a) The abbreviation of FSC Claims is clearly defined in the organization’s documented procedures, andb) The complete FSC claim is provided to customers through supplementary evidence, as defined in ADVICE-40-004-05 of FSC-DIR-40-004.	

Code	INT-DIR-40-004_04
Requirement (s)	ADVICE-40-004-06
Publication date	07 August 2012
<p>Do all NTFP (non-timber forest product) ingredients/components of a product need to be certified?</p> <p>No. For NTFP products, it is acceptable that only one ingredient/component is FSC certified as long as clear reference to the certified ingredient/component is made on the FSC label and/or associated statements.</p>	

Code	INT-DIR-40-004_03
Requirement (s)	ADVICE-40-004-06
Publication date	07 August 2012
<p>Do NTFP (Non-timber forest product) components in a wood-based product (e.g. a rattan seat in a wooden chair) need to be certified?</p> <p>The use of a non-certified NTFP component in a wood-based product is acceptable where the components are distinguishable and the FSC label specifies wood as the certified component. Where the forest-based components are not distinguishable (e.g. a paper containing both NTFP and wood), both shall be certified in order to carry the FSC label.</p>	

Code	INT-DIR-40-004_02
Requirement (s)	ADVICE-40-004-06
Publication date	22 March 2012
<p>Does the release paper in envelopes need to be FSC certified?</p> <p>No. The envelope is the main product and needs to be FSC certified. The release paper has a secondary function and its certification is optional.</p>	

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Interpretations of the normative framework

CONTROLLED WOOD

16 January 2018



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STANDARDS

FSC-STD-20-012 (V1-1) STANDARD FOR EVALUATION OF FSC CONTROLLED WOOD IN FOREST MANAGEMENT ENTERPRISES

Code	INT-STD-20-012_01 (also published under FSC-STD-30-010 with code INT-STD-30-010_06)
Requirement (s)	Clause 1.1
Publication date	10 July 2015
<p>1) Is the conversion of plantations that have previously been established on agricultural land back to agricultural land acceptable according to the requirements of FSC-STD-30-010 (Clause 6.1)?</p> <p>2) Are abandoned (unmanaged) plantations established on agricultural land and destined for conversion back to agricultural land eligible for certification according to FSC-STD-30-010?</p> <p>1) Yes. Only conversion of natural and semi-natural forests and other wooded ecosystems such as woodlands and savannahs to plantation or non-forest uses is not allowed according to the standard (with exceptions specified in Clause 6.3).</p> <p>2) No. The certification of abandoned or unmanaged plantations does not meet the intent of the standard, which is designed for application by forest management enterprises (FMEs) at the forest management unit (FMU) level. According to the definitions of FME and FMU, the implementation of the standard involves forest management, which shall not be downgraded to clear cutting of plantations.</p>	

Code	INT-STD-20-012_02 (also published under FSC-STD-30-010 with code INT-STD-30-010_07)
Requirement (s)	Sections 3-7
Publication date	Previous version: 9 August 2015; this Version: 16 January 2018
<p>According to Clause 7.4 of FSC-STD-20-012 V1-1, “A non-compliance shall be considered major if, either alone or in combination with further non-compliances of other indicators, results in, or is likely to result in a fundamental failure to achieve the objectives of the standard in the forest management unit(s) within the scope of the evaluation.”</p> <p>How shall this be interpreted when considering non-compliances with requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0)?</p> <p>Non-compliances for requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0) shall always be considered major. As per Clauses 7.6 and 7.7 of FSC-20-012 V1-1, the certification body shall not issue or reissue a certificate if there is a major non-compliance with the requirements of the standard, and the certificate shall be suspended in case a major non-compliance is identified after the Controlled Wood certificate has been issued. The note under Clause 7.6 of the standard does not apply to major non-compliances for Controlled Wood categories.</p> <p>Minor non-compliances are possible only in instances where requirements for Sections 1 and 2 of FSC-STD-30-010 V2-0 are not implemented correctly, and/or the status of the material as “FSC Controlled Wood” is not affected.</p>	

Code	INT-STD-20-012_03
Requirement (s)	Clauses 7.6-7.7
Publication date	01 July 2016
<p>Is restoration of converted forests containing high conservation values required to close a major corrective action request issued according to Clause 6.3 in FSC-STD-30-010 V2-0?</p> <p>No, the standard does not specify the action to be taken to address such a corrective action request. In the context of this standard, a certificate shall be suspended when a major nonconformity is identified (Clause 7.7). It is the responsibility of the organization to implement appropriate measures to correct the nonconformity in order to lift the suspension.</p>	

FSC-STD-30-010 (V2-0) FSC CONTROLLED WOOD STANDARD FOR FOREST MANAGEMENT ENTERPRISES

Code	INT-STD-30-010_01 (also published under FSC-STD-40-005 with code INT-STD-40-005_02)
Requirement (s)	FSC-STD-30-010
Publication date	31 January 2012
<p>Within a National Initiative “unspecified risk” category, is it possible for a company to classify a smaller district as “low risk”?</p> <p>No, unless done at the FMU level through the process described in Annex 3 of FSC-STD-40-005. According to this standard, where national or regional interpretation or guidance relating to Annex 2 has been provided by an FSC accredited National Initiative, this interpretation shall prevail.</p> <p>Other option would be that the Forest Manager got certified according to FSC-STD-30-010.</p>	

Code	INT-STD-30-010_06 (also published under FSC-STD-20-012 with code INT-STD-20-012_01)
Requirement (s)	Section A (Scope), Clause 6.1
Publication date	10 July 2015
<p>1) Is the conversion of plantations that have previously been established on agricultural land back to agricultural land acceptable according to the requirements of FSC-STD-30-010 (Clause 6.1)?</p> <p>2) Are abandoned (unmanaged) plantations established on agricultural land and destined for conversion back to agricultural land eligible for certification according to FSC-STD-30-010?</p> <p>1) Yes. Only conversion of natural and semi-natural forests and other wooded ecosystems such as woodlands and savannahs to plantation or non-forest uses is not allowed according to the standard (with exceptions specified in Clause 6.3).</p> <p>2) No. The certification of abandoned or unmanaged plantations does not meet the intent of the standard, which is designed for application by forest management enterprises (FMEs) at the forest management unit (FMU) level. According to the definitions of FME and FMU, the implementation of the standard involves forest management, which shall not be downgraded to clear cutting of plantations.</p>	

Code	INT-STD-30-010_04
Requirement (s)	Clause 1 e) (Note)
Publication date	21 August 2013
<p>How should the nationally developed HCV Framework be applied according to the standard FSC-STD-30-010?</p> <p>The standard FSC-STD-30-010 requires, that the Forest Management Enterprise shall consider guidance that may be provided by FSC International, FSC regional offices, or by FSC accredited national initiatives in relation to interpreting the requirements of FSC-STD-30-010 in a particular national or sub-national context.</p> <p>There is an approved 'High Conservation Values (HCVs) evaluation framework for use in the con-text of implementing FSC Certification to the FSC Principles and Criteria and Controlled Wood standards' developed by FSC Australia. The following questions aim to clarify how to implement the Framework.</p> <p>How shall requirements be interpreted that use the term 'consider' – are all the elements of the Framework mandatory? Or can the FME select which elements they deem to be relevant?</p> <p>Do all of the steps need to be followed for each HCV1-6? Note that some of the steps have been pointed out to be contradictory.</p> <p>Is there any difference in the Framework requirements for SLIMF or plantation forest?</p> <p>FME shall use approved HCV Framework and apply all its elements relevant for FME. In case of contradiction these shall be reported to relevant FSC National Partner and PSU.</p> <p>SLIMF: HCV Framework serves mainly for HCV identification. Annex 2 of FSC-STD-30-010 (5.2) requires HCVs identification, thus HCV Framework shall be used in SLIMF operations.</p> <p>Plantation: Framework shall also be used for plantations when relevant as per Framework contents.</p>	

Code	INT-STD-30-010_02
Requirement (s)	Clause 3.2, Intent Box.
Publication date	4 May 2012
<p>In countries where there is an approved FSC National Standard, how should approved elements in the national standard which could equally pertain to the interpretation and application of Controlled Wood (FSC -STD-30-010 V2-0) be regarded?</p> <p>Where elements of an approved national standard can be equally applied to the interpretation and application of Controlled Wood in a given country, these elements shall be applied in relation to the specific category of Controlled Wood; e.g. advice in the national standard on the assessment of legal compliance.</p>	

Code	INT-STD-30-010_07 (also published under FSC-STD-20-012 with code INT-STD-20-012_02)
Requirement (s)	Sections 3-7
Publication date	Previous version: 9 August 2015; this Version: 16 January 2018
<p>According to Clause 7.4 of FSC-STD-20-012 V1-1, “A non-compliance shall be considered major if, either alone or in combination with further non-compliances of other indicators, results in, or is likely to result in a fundamental failure to achieve the objectives of the standard in the forest management unit(s) within the scope of the evaluation.”</p> <p>How shall this be interpreted when considering non-compliances with requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0)?</p> <p>Non-compliances for requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0) shall always be considered major. As per Clauses 7.6 and 7.7 of FSC-20-012 V1-1, the certification body shall not issue or reissue a certificate if there is a major non-compliance with the requirements of the standard, and the certificate shall be suspended in case a major non-compliance is identified after the Controlled Wood certificate has been issued. The note under Clause 7.6 of the standard does not apply to major non-compliances for Controlled Wood categories.</p> <p>Minor non-compliances are possible only in instances where requirements for Sections 1 and 2 of FSC-STD-30-010 V2-0 are not implemented correctly, and/or the status of the material as “FSC Controlled Wood” is not affected.</p>	

Code	INT-STD-30-010_08
Requirement (s)	Section 4
Publication date	03 May 2017
<p>1) The term ‘Traditional and Indigenous Peoples groups’ could be broken into ‘Traditional groups’ and ‘Indigenous Peoples groups’. It could also be broken down into ‘Traditional Peoples groups’ and ‘Indigenous Peoples groups’. Which is the correct reading?</p> <p>2) What is the definition of ‘Traditional Peoples’ and ‘Indigenous Peoples’?</p> <p>3) What is the timeframe for ‘long established custom or traditional occupation and use’?</p> <p>1) The correct reading is ‘Traditional Peoples groups’ and ‘Indigenous Peoples groups’.</p> <p>2) The definitions as provided in the ‘<i>FSC Principles and Criteria for Forest Stewardship</i>’ (FSC-STD-01-001 V5-2) apply:</p>	

Traditional Peoples: Traditional Peoples are social groups or peoples who do not self-identify as Indigenous and who affirm rights to their lands, forests and other resources based on long established custom or traditional occupation and use (Source: Forest Peoples Programme (Marcus Colchester, 7 October 2009)).

Indigenous Peoples: People and groups of people that can be identified or characterized as follows:

- The key characteristic or criterion is self-identification as Indigenous Peoples at the individual level and acceptance by the community as their member
- Historical continuity with pre-colonial and/or pre-settler societies
- Strong link to territories and surrounding natural resources
- Distinct social, economic or political systems
- Distinct language, culture and beliefs
- Form non-dominant groups of society
- Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities.

(Source: Adapted from United Nations Permanent Forum on Indigenous Issues, Factsheet 'Who are Indigenous Peoples' October 2007; United Nations Development Group, 'Guidelines on Indigenous Peoples' Issues' United Nations 2009, United Nations Declaration on the Rights of Indigenous Peoples, 13 September 2007).

3) There is no specific timeframe defined by FSC. Communities or persons can acquire customary rights by various means which can be long term (living in an area for a longish period of time) or short term (opening up a new area in line with customary law or via transfer). Thus, under customary law, what is important is not how long a person or community has been on the land but the means by which they acquired or asserted their rights.

Code	INT-STD-30-010_05
Requirement (s)	Clause 4.2
Publication date	19 May 2014
<p>Shall the certification body issue a non-compliance against Clause 4.2 and/or 4.5 of FSC-STD-30-010 where a minority of stakeholders do not agree on the dispute resolution process?</p> <p>Non-conformity against Clause 4.2 shall be issued in cases where a stakeholder(s) that is one of the main parties in the dispute disagrees with the resolution process. Non-conformity against Clause 4.2 shall not be issued in cases where the stakeholder(s) that disagrees is not one of the main parties to the dispute.</p> <p>The main parties to the dispute are those who are directly involved in the dispute (e.g. complainants/plaintiffs and defendants to which the claim is made against).</p>	

Code	INT-STD-30-010_03
Requirement (s)	Section 6
Publication date	8 February 2013

The use of the present tense (*being converted; take place, etc.*) suggests that FSC accepts conversion that has happened in the past. But until when? What is the cut-off date?

The cut-off date for FSC certification for controlled wood for forest management enterprises is the date when the organization signs the certification agreement with the CAB as this document includes the general requirement to adhere to all applicable rules and regulations as published by FSC (see FSC-STD-20-001 V3-0 Clause 7.2 c).

Code	INT-STD-30-010_10
Requirement (s)	Section 5 and 6
Publication date	16 January 2018
<p>There is a diversity of opinion among experts and scientific studies on how logging activities in Karri forests impact RTE species. In particular, it is unclear whether or not the reforestation and silviculture procedures applied by organizations constitute a conversion from the natural variation of mixed and karri dominated forests to forest stands of predominantly karri.</p> <p>While the organization's procedures may require that a mix of tree species is replaced where a mixed forest has been harvested, it may not require that the mix of reforested trees be estimated on the proportion of each tree species in the stand at the time of harvest. This is because the proportion of each tree species at the time of planting does not predicate the final proportion in a mature stand, since natural disturbance (especially fire) will shape the stand as it grows. However, a lack of regulation on the proportions planted allows for reforested mixed stands to contain a mix of species that is predominantly karri even if karri was not the dominant tree species to begin with. This may lead to conversion of mixed forests over time. HCV 1 Rare Threatened and Endangered (RTE) species that rely on other tree species within the karri and mixed forests in the FMU are potentially negatively affected by the loss of mixed forest stands because they show preference for marri trees, which tend to create better hollows. However, this is not firmly established and hollow nesting species will use karri trees, but it is not known what impact the loss of mixed forest stands would have on these RTE species.</p> <p>Against the background of uncertain unscientific knowledge,</p> <ol style="list-style-type: none"> 1. Do the activities of the organization need to be restricted / adjusted, taking the prerequisite of a precautionary approach into consideration so that conversion and/or deterioration of forest ecosystems are prevented, and 2. Does FSC's standard requirements for conversion in FSCSTD-30-010 need to be adapted or whether more scientific information be sought by FSC so that there is a resolution of this dispute <p>1) Deterioration of forest containing HCV 1, including changes in species composition and the forest structure in management/regeneration cycle shall be considered as a threat to HCV values. Considering a precautionary approach, as well as requirements in Section 5 of the standard, the organization shall ensure that deterioration of the forest ecosystems is prevented. This can be demonstrated by compliance with Section 5 of the standard.</p>	

- 2) The provided information is not sufficient for FSC to conclude whether ongoing forest management practices will lead to conversion. FSC recommends further research to be conducted by FSC Australia in this regard.

Code	INT-STD-30-010_09
Requirement (s)	Clause 6.1
Publication date	18 July 2017
<p>In some concession areas, conversion is often being done through illegal logging and encroachment by parties other than the forest manager. As the primary objective is plantation management on such concessions, little or no effort is made to control the illegal conversion occurring in the natural forests.</p> <p>Do the requirements of 6.1 apply to activities carried out by parties other than the forest manager or their contractors? To put another way, would uncontrolled illegal activities carried out by parties other than the FME resulting in conversion of forests to non-forest use on the FMU(s) included in the scope of the evaluation be a nonconformance with criterion 6.1?</p> <p>Yes. As FSC-STD-30-010 is applied at the level of the FMU, activities taking place in FMUs included in the scope of the certificate shall be considered in determining conformance with the requirements, regardless of who carries out the activities. Therefore, if forest conversion is occurring as the result of illegal activities within the FMU, this constitutes a nonconformance with Clause 6.1.</p>	

Code	INT-STD-30-010_11 (also published under FSC-STD-40-005 V3-1 under code INT-STD-40-005_24)
Requirement (s)	FSC-STD-30-010 V 2-0
Publication date	16 January 2018
<p>1 What criteria may be used to determine the parameters for definition of a 'forest', for protection of Old Growth Type 2 'forest' in Australian context? Is it appropriate to use a minimum area in order to distinguish between a 'forest' and a tree, or line of trees?</p> <p>2 Is the intention that the NFSS will be issued soon and override the need for this interpretation?</p> <p>1. No, in Australian context it is not appropriate to use a minimum area in order to distinguish between an Old Growth Type 2 'forest' and a tree, or line of trees. This is because the key element in Type 2 in the FSC Australia HCV assessment framework (applicable for implementation of the standard FSC-STD-40-005) is the use of 'stand', as stated on page 13:</p> <p>“(B) Type 2 Old Growth: stands that have been logged, but which retain significant late-successional/old-growth structure and functions. “</p>	

The commonly used definition of a stand is: "a contiguous area that contains a number of trees that are relatively homogeneous or have a common set of characteristics."

Accordingly, a stand should be used as the definition of 'forest' for Old Growth Type 2.

Because of the requirement to maintain HCV values (controlled wood) and maintain and enhance (FM certificates) in Australian normative framework, both areas of Old Growth type 1 and 2 have to be maintained and or enhanced. In practice, this means that all stands that meet the Old Growth category are protected with allowance made for removing individual trees (normally just 1) under legal permit for reasons such as:

- The tree would represent a health and safety risk in the forest
- There are genuine silvicultural reasons to remove a single tree e.g. access.

2. It is the intention that the CW and FM standards be harmonized so that there is only one set of HCV definitions applying in Australia.

This interpretation will be revised upon the approval of the Australian NFSS, containing provisions for minimum area threshold for identifying what constitutes an HCV Area.

FSC-STD-40-005 (V2-1) STANDARD FOR COMPANY EVALUATION OF FSC CONTROLLED WOOD

Code	INT-STD-40-005_04 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_02)
Requirement (s)	Applies to all requirements where the CPI is mentioned
Publication date	6 September 2013
<p>In 2012 the Corruption Perception Index (CPI) changed from a scale of 0-10 to a scale of 0-100. Shall the new 0-100 CPI scale be implemented in FSC normative documents that currently still reference the previous 0-10 scale system?</p> <p>Yes, CPI references in FSC normative documents using the 0-10 scale system shall be converted to the new scale.</p> <p>A reference to a CPI index threshold '5' based on the old scale system becomes a CPI index '50' applying the new scale.</p>	

Code	INT-STD-40-005_06
Requirement (s)	Categories 2, 3, 4
Publication date	18 May 2014
<p>Can material originating from artificially submerged forests be evaluated according to the standard FSC-STD-40-005?</p> <p>Materials harvested from standing “dead” forests that have been e.g. submerged to construct water reservoirs or dams are eligible for evaluation under the FSC Controlled Wood Standard FSC-STD-40-005 V2-1. In this case the district shall be set at the submerged area in question.</p> <p>When evaluating conformance with the standard, special attention shall be given to the requirements of Controlled Wood Categories 2, 3 and 4, which, depending on circumstances, may be particularly challenging to be met.</p> <p>This interpretation supersedes any former interpretations relevant for this question.</p>	

Code	INT-STD-40-005_14 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_10)
Requirement (s)	7.1
Publication date	9 July 2014
<p>Can timber of unknown origin collected from beaches be evaluated according to the standard FSC-STD-40-005?</p> <p>No, timber collected from beaches is not eligible for evaluation under the FSC Controlled Wood Standard FSC-STD-40-005 V2-1.</p>	
Code	INT-STD-40-005_16 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_11)
Requirement (s)	9.1
Publication date	10 October 2014

If a certified company sources material that has previously been FSC certified or covered by another company's FSC Controlled Wood verification program but has since been traded by a non-certified company (therefore breaking the Chain of Custody), can this material be considered controlled with-out conducting a full verification program and risk assessment?

For previously FSC-certified material from a broken Chain of Custody to be considered as FSC Controlled Wood, the company must trace the material back to the certified company that traded it to the non-certified company where the Chain of Custody was broken, and conduct an audit of the supply chain. This audit shall demonstrate with verifiable documentation that the material is identifiable and traceable and has not been mixed with uncontrolled material.

For previously controlled material from a broken Chain of Custody to be considered as FSC Controlled Wood, the district of origin must be determined within/through the company's own Controlled Wood verification program, for which all relevant normative requirements apply. For this purpose, risk assessments performed by other entities (e.g. a supplier with a valid FSC certificate that includes FSC Controlled Wood in its scope that sold FSC Controlled Wood (without a claim) to a non-certified entity) may be used as additional sources of information.

Code	INT-STD-40-005_11 V2-1 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_07)
Requirement (s)	Section 11
Publication date	9 July 2014

In cases where there is an approved national risk assessment, is it acceptable for the certificate holder to use the National Risk Assessment to satisfy the controlled wood requirements for conducting a risk assessment as specified in FSC-STD-40-005 and FSC-DIR-40-005, rather than having to generate its own risk assessment?

The use of approved National Risk Assessments (NRAs) for sourcing Controlled Wood according to FSC-STD-40-005 is mandatory. Certificate holders have different options for aligning their verification programs with the results of applicable NRAs. Certificate holders may, for example, use NRAs available on FSC's website and/or the Global Forest Registry, or generate or update a new or existing company-developed risk assessment with the risk designation(s) provided in relevant NRAs. These examples are not exhaustive.

Code	INT-STD-40-005_05 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_03)
Requirement (s)	Clause 11.1
Publication date	5 February 2014
<p>Which process shall be implemented if a certified FMU is under suspension in a district that has been designated as low risk for all CW categories either by a National Risk Assessment or by a COC Certificate Holder in their FSC Controlled Wood verification pro-gram when the COC Certificate Holder wants to source from this FMU?</p> <p>At the moment of suspension, the products sold by the certified FMU* are losing their FSC status. As the FMU is located in a designated low risk district for CW, the products may still be sourced as “controlled material” under the following conditions:</p> <ol style="list-style-type: none"> 1. As some or all CW categories may be affected by activities that led to the suspension of the FMU, the COC Certificate Holder shall review and if necessary revise their risk assessment for the area of the suspended FMU. 2. The review/revision of the risk assessment shall be completed by the COC Certificate Holder within a period of two months from the date of suspension of the FMU certificate. 3. The COC Certificate Holder shall submit the reviewed/revise risk assessment to their CB for verification. 4. The reviewed/revise risk assessment shall be verified by the CB no later than one month after the COC Certificate Holder has submitted its reviewed/revise risk assessment, before it can be applied (see FSC-STD-40-005 V2-1 Clause 11.1). 5. As the whole district is considered low risk, the products sourced from the suspended FMU are considered controlled until the verification of the reviewed/revise risk assessment is completed by the relevant CB. 6. The outcome of the review/revision process including verification by the relevant CB will then determine the risk designation for the suspended FMU. 7. Material sourced from the area shall be classified as unspecified risk, if the timelines of review/revision and verification of the risk assessment (2, 4) is not met. <p>* according to the standard FSC-STD-01-001 or FSC-STD-30-010</p>	

Code	INT-STD-40-005_18 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_12)
Requirement (s)	Clause 13.2, Annex 3
Publication date	28 October 2014
<p>Shall the outcomes of a company verification program according to Annex 3 be made publicly available?</p> <p>No, currently there are no requirements for publishing the outcomes of verification according to Annex 3. The standard does not limit such an opportunity, however.</p>	

Code	INT-STD-40-005_08 V2-1
Requirement (s)	Section 14
Publication date	9 July 2014
<p>If a company receives a complaint regarding their risk assessment and/or company verification program, does it matter if the complainant identifies the complaint as formal or informal as per the FSC Dispute Resolution Process?</p> <p>No, it does not matter. The company is required to deal with all complaints that are received according to the requirements of Section 14 of FSC-STD-40-005, irrespective of the complaint classification by a complainant. Controlled Wood requirements for the handling of complaints by Certificate Holders are not subject to the FSC Dispute Resolution Process and shall be evaluated by the Certificate Holder, according to their own mechanism.</p>	

Code	INT-STD-40-005_09 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_05)
Requirement (s)	Annex 1
Publication date	9 July 2014
<p>With regards to Category 3 (HCV), what is the minimal level of detail for describing the sourcing in the district of origin in the published company risk assessment? If the district of origin includes potentially controversial sources, when the company describes their sourcing in this area, must the description of their sourcing explicitly state that they are not sourcing from controversial FMUs in that district?</p> <p>The minimum required information to be included in the publically available results of the risk assessment are provided in ADVICE 40-005-07 of FSC-DIR-40-005, which applies to all CW categories. In case of potentially controversial activities in FMUs located in a low risk district (See ADVICE 40-005-02 of FSC-DIR-40-005), a company should mention the existing FMUs with potential controversial activities in the publically available results of a risk assessment.</p>	

Code	INT-STD-40-005_15 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_04)
Requirement (s)	Annex 1
Publication date	9 July 2014
<p>How should companies treat ecoregions that are not within the WWF Global 200 but are listed as ‘critical/endangered’ or ‘threatened’ by WWF? Should this information always be included in risk assessments, under 3.1?</p> <p>The standard requires consideration of ‘ecoregionally significant HCVs’ and does not limit the recognition of ecoregions to Global 200 ecoregions. General references provided in the standard direct to WWF sources without limitation to Global 200 ecoregions (FSC-STD-40-005, Annex 1, definition of ecoregion). Therefore, information about threatened ecoregions other than the examples provided in FSC-STD-40-005 and FSC-DIR-40-005 should be taken into account. The company shall not ignore known and available sources of information in addition to the ones listed in normative documents.</p>	

Code	INT-STD-40-005_13 V2-1 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_09)
Requirement (s)	Annex 1
Publication date	9 July 2014
<p>Can a district of origin cover more than one country? If so, is a separate risk assessment required for each country, given the heterogeneity in assessing risk between two different sets of laws? What about within countries where the sub-national units (states, provinces, etc.) have the independence to create their own resource use and protection laws?</p> <p>According to its definition, a ‘district’ is considered to be a generic geographical definition within a country. Subject to the above, various guidance and requirements are provided stating that how a district shall be established depends on the CW category under assessment. In the case of National Risk Assessments (NRAs) it is possible to develop shared NRAs for countries sharing homogenous conditions (e.g. sharing the same ecoregions), according to the procedure FSC-PRO-60-002 V2-0 (FSC Controlled Wood Risk Assessments by FSC accredited National Initiatives, National and Regional offices).</p> <p>Subject to the specific conditions of each CW category, the division of a country into sub-national units (e.g. states, provinces) will only impact how a district is defined if those divisions result in increased heterogeneity of the level or type of risk that is assessed within them.</p>	

Code	INT-STD-40-005_10 V2-1 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_06)
Requirement (s)	Annex 1
Publication date	9 July 2014
<p>Does the concept of ‘minimally disturbed by human economic activity’ in the definition of Intact Forest Landscape include fire suppression?</p> <p>Regarding definition of Intact Forest Landscape, firefighting or prevention for the protection of public safety is not considered an economic activity. Fire control in the context of forest management activities is not considered to be an economic activity of minimal disturbance.</p>	

Code	INT-STD-40-005_12 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_08)
Requirement (s)	Annex 2
Publication date	9 July 2014
<p>Is a CoC-certified harvesting company that DOES NOT own or manage the forest required to conduct a nature value assessment when conducting a risk assessment according to Annex 2 of FSC-STD-40-005, when a nature value assessment is required by the respective National Forest Stewardship Standard?</p> <p>No, a company that is conducting a risk assessment according to Annex 2 of FSC-STD-40-005 (V2-1) is not required to perform a nature value assessment, unless it is required by an approved national guidance as per Annex 2, part A, Clause 2 of FSC-STD-40-005 and/or as per FSC-DIR-40-005-09, Clause 3 (Advice).</p>	

Code	INT-STD-40-005_07 V2-1
Requirement (s)	Annex 2, part B, Section 2
Publication date	9 July 2014
<p>How should a risk assessment be conducted following Clause 2.5 when ILO 169 is not ratified?</p> <p>The standard does not refer to the ratification of ILO 169 and a risk assessment shall involve an assessment of evidence of violation of ILO requirements, irrespective of whether they have been ratified by the country in which the risk assessment is made.</p>	

Code	INT-STD-40-005_03
Requirement (s)	Annex 2 and 3.
Publication date	4 May 2012
<p>Can wood from plantations converted to non-forest use be acceptable according to Category 4 of CW Standard FSC-STD-40-005?</p> <p>Yes, wood from plantations converted to non-forest use is acceptable according to Category 4 of FSC-STD-40-005.</p>	

Code	INT-STD-40-005_01 V2-1
Requirement (s)	Annex 2, A.3
Publication date	8 December 2011
<p>What is the definition of FMU in FSC terms and does this definition count for all references to FMU in FSC Standards, including Controlled Wood?</p> <p>Yes, the definition of FMU is the same for all references in FSC Standards, including Controlled Wood.</p> <p>Forest Management Unit (FMU): A clearly defined forest area with mapped boundaries, managed by a single managerial body to a set of explicit objectives which are expressed in a self-contained multi-year management plan.</p> <p>The term 'management plan' is key and taken as equivalent to that which is described in FSC Principle 7.</p>	

Code	INT-STD-40-005_17 V2-1
Requirement (s)	Annex 3
Publication date	28 October 2014
<p>If a company risk assessment or applicable National Risk Assessment concludes 'unspecified risk' for a district and then field verification at the forest level by a company implementing Annex 3 concludes 'low risk', is it possible to use the outcomes from the field verification as a source of information/evidence in the risk assessment to conclude low risk at the level of the whole district?</p> <p>No, the field verification according to Annex 3 allows the verification of risk at the FMU level. The confirmation of low risk at the FMU level cannot be extrapolated to the district level.</p>	

Code	INT-STD-40-005_02 (also published under FSC-STD-30-010 with code INT-STD-30-010_01)
Requirement (s)	Annex 3
Publication date	31 January 2012
<p>Within a National Initiative “unspecified risk” category, is it possible for a company to classify a smaller district as “low risk”?</p> <p>No, unless done at the FMU level through the process described in Annex 3 of FSC-STD-40-005. According to this standard, where national or regional interpretation or guidance relating to Annex 2 has been provided by an FSC accredited National Initiative, this interpretation shall prevail.</p> <p>Other option would be that the Forest Manager got certified according to FSC-STD-30-010.</p>	

Code	INT-STD-40-005_19
Requirement (s)	Annex 4
Publication date	2 July 2015
<p>An FSC Chain of Custody (CoC) certified manufacturer is making furniture (final product) for sale to a large international retailer that does not hold a CoC certificate. According to FSC-STD-40-005 V2-1, Annex 4, Clause 1.4, the CoC certified manufacturer cannot make a Controlled Wood claim on sales documentation for the furniture, since the retailer does not hold a CoC certificate.</p> <p>Is there any claim or statement that the CoC company can make on or off product? Such a claim or statement may be asked for, for example, by retailers with responsible procurement policies or by importers wanting to meet legality legislation.</p> <p>No. FSC certificate holders are not allowed to promote Controlled Wood products or to make FSC Controlled Wood claims on sales documents issued to non-FSC certified customers.</p>	

FSC-STD-40-005 (V3-0 and V3-1) REQUIREMENTS FOR SOURCING FSC CONTROLLED WOOD

Code	INT-STD-40-005_20
Requirement (s)	FSC-STD-40-005 V3-0
Publication date	03 June 2016
<p>The revised FSC-STD-40-005 V3-0 does no longer include requirements regarding sales claims related to FSC Controlled Wood (CW) as previously included in Annex 4 of FSC-STD-40-005 V2-1. Does this mean that these requirements are no longer valid when implementing FSC-STD-40-005 V3-0?</p> <p>No, the requirements included in Annex 4 of FSC-STD-40-005 V2-1 are still valid as they are already covered by other normative documents:</p> <ol style="list-style-type: none"> 1. The requirements for use of FSC trademarks for the promotion of FSC Controlled Wood (Clauses 1.1, 1.2, 1.3, 1.6, 1.9 and 1.10 of FSC-STD-40-005 V2-1 Annex 4) are covered by Clause 1.4 of FSC-STD-50-001 V1-2. The reference to FSC-STD-40-005 V2-1 Annex 4 shall be interpreted as the reference to this interpretation. Organizations supplying FSC Controlled Wood may use the statement “FSC Controlled Wood” as segregation mark during manufacturing or transportation processes or storage. The segregation marks shall always be accompanied by the FSC controlled wood certificate code issued by the certification body. Segregation marks with the statement “FSC Controlled Wood” shall be removed/deleted if products are reaching final points of sale and/or when the segregation marks could be interpreted as commercial labels. 2. The requirements for sale of finished products as FSC Controlled Wood and sale of FSC Controlled Wood to non-FSC certificate holders (Clause 1.4 of FSC-STD-40-005 V2-1 Annex 4) are covered by footnote 4 of FSC-STD-40-004 V2-1. The term “trading” in the footnote shall be read as “commercialization”. The footnote is applicable to all FSC certificate holders, not only to traders. The reference to FSC-STD-40-005 V2-1 in the footnote shall be interpreted as the reference to this interpretation. 3. The requirement for translation of the FSC Controlled Wood claim on sales and delivery documents (Clause 1.5 of FSC-STD-40-005 V2-1 Annex 4) is covered by INT-STD-40-004_07. 4. The requirements for identification of sales documents of FSC Controlled Wood (Clauses 1.7, 1.8 and 1.10 of FSC-STD-40-005 V2-1 Annex 4) are covered by Clause 6.1.1 f, 6.1.1 g of FSC-STD-40-004 V2-1. 	

Code	INT-STD-40-005_21
Requirement (s)	FSC-STD-40-005 V3-1 Clause 4.8, Annex B clause 1.2
Publication date	16 January 2018
<p>Is the organization required to undertake stakeholder consultation in advance of each and every forest management activity covered by the DDS, as per Annex B, Clause 1.2 (FSC-STD-40-005 V3-1)?</p> <p>No, the organization is not expected to conduct stakeholder consultation in advance of each and every forest management activity. The frequency of the consultations needs to occur at</p>	

a rate adequate and proportionate to the risk caused by the management activity and shall be defined by the organization.

Code	INT-STD-40-005_22
Requirement (s)	FSC-STD-40-005 V3-1, Annex A, Controlled Wood Category 3 Clause 3.9 Indicator 3.2
Publication date	16 January 2018
<p>When the organization conducts stakeholder consultation to demonstrate that there is significant support to low risk designation by relevant national/regional stakeholders from the assessed supply area, consulted stakeholders may not respond. Can a lack of response to stakeholder consultation demonstrate evidence of significant support?</p> <p>No, the lack of a response to stakeholder consultation cannot be considered as evidence for significant support. Support to a low risk designation needs to be demonstrated by an affirmative and positive response from the stakeholders.</p>	

Code	INT-STD-40-005_23
Requirement (s)	FSC-STD-40-005 V3-1 Annex A
Publication date	16 January 2018
<p>FSC-STD-40-005 V3-1 Annex A Controlled Wood Category 3 Clause 3.9 (Examples of sources of information Indicator 3.1) reads: <i>‘Forest, woodland, or mangrove ecoregions identified by World Wildlife Fund as a Global 200 Ecoregion and assessed by WWF as having a conservation status of endangered or critical. If the Global 200 Ecoregion comprises more than a single terrestrial ecoregion, an ecoregion within the Global 200 Ecoregion can be considered low risk if the sub-ecoregion has a Conservation Status other than ‘critical’ or ‘endangered’ (www.worldwildlife.org/science/wildfinder).</i></p> <p>The use of the word “and” has limited the requirement to Global 200 ecoregions <u>which are also assessed by WWF as having a conservation status of endangered or critical</u>. Otherwise the word “or” would have been used. Therefore, does a region that has been evaluated by WWF as critically endangered no longer needs to be considered as potentially HCVF, unless it is also a Global 200 Region.</p> <p>The standard requires consideration of ‘ecoregionally significant HCVs’ and does not limit the recognition of ecoregions to Global 200 ecoregions. General references provided in the standard direct to WWF sources without limitation to Global 200 ecoregions (FSC-STD-4005, Annex 1, definition of ecoregion). Therefore, information about threatened ecoregions other than the examples provided in FSC-STD-40-005 V3-1 should be taken into account. The organization shall not ignore known and available sources of information in addition to the ones listed in normative documents.</p>	

Code	INT-STD-40-005_24 (also published under FSC-STD-30-010 V2-0 with code INT-STD-30-010_11)
Requirement (s)	FSC-STD-40-005 3-1
Publication date	16 January 2018

- 1 What criteria may be used to determine the parameters for definition of a 'forest', for protection of Old Growth Type 2 'forest' in Australian context? Is it appropriate to use a minimum area in order to distinguish between a 'forest' and a tree, or line of trees?**
- 2 Is the intention that the NFSS will be issued soon and override the need for this interpretation?**

1. No, in Australian context it is not appropriate to use a minimum area in order to distinguish between an Old Growth Type 2 'forest' and a tree, or line of trees. This is because the key element in Type 2 in the FSC Australia HCV assessment framework (applicable for implementation of the standard FSC-STD-40-005) is the use of 'stand', as stated on page 13:

“(B) Type 2 Old Growth: stands that have been logged, but which retain significant late-successional/old-growth structure and functions. “

The commonly used definition of a stand is: "a contiguous area that contains a number of trees that are relatively homogeneous or have a common set of characteristics."

Accordingly, a stand should be used as the definition of 'forest' for Old Growth Type 2.

Because of the requirement to maintain HCV values (controlled wood) and maintain and enhance (FM certificates) in Australian normative framework, both areas of Old Growth type 1 and 2 have to be maintained and or enhanced. In practice, this means that all stands that meet the Old Growth category are protected with allowance made for removing individual trees (normally just 1) under legal permit for reasons such as:

- The tree would represent a health and safety risk in the forest
- There are genuine silvicultural reasons to remove a single tree e.g. access.

2. It is the intention that the CW and FM standards be harmonized so that there is only one set of HCV definitions applying in Australia.

This interpretation will be revised upon the approval of the Australian NFSS, containing provisions for minimum area threshold for identifying what constitutes an HCV Area.

DIRECTIVES

FSC-DIR-40-005 FSC DIRECTIVE ON FSC CONTROLLED WOOD

Code	INT-DIR-40-005_02 (also published under FSC-STD-40-005 with code INT-STD-40-005_04 and under FSC-STD-20-011 with code INT-STD-20-011_07)
Requirement (s)	Applies to all requirements where the CPI is mentioned
Publication date	6 September 2013
<p>In 2012 the Corruption Perception Index (CPI) changed from a scale of 0-10 to a scale of 0-100. Shall the new 0-100 CPI scale be implemented in FSC normative documents that currently still reference the previous 0-10 scale system?</p> <p>Yes, CPI references in FSC normative documents using the 0-10 scale system shall be converted to the new scale.</p> <p>A reference to a CPI index threshold '5' based on the old scale system becomes a CPI index '50' applying the new scale.</p>	

Code	INT-DIR-40-005_04 (also published under FSC-STD-40-005 with code INT-STD-40-005_15)
Requirement (s)	ADVICE-40-005-01
Publication date	9 July 2014
<p>How should companies treat ecoregions that are not within the WWF Global 200 but are listed as 'critical/endangered' or 'threatened' by WWF? Should this information always be included in risk assessments, under 3.1?</p> <p>The standard requires consideration of 'ecoregionally significant HCVs' and does not limit the recognition of ecoregions to Global 200 ecoregions. General references provided in the standard direct to WWF sources without limitation to Global 200 ecoregions (FSC-STD-40-005, Annex 1, definition of ecoregion). Therefore, information about threatened ecoregions other than the examples provided in FSC-STD-40-005 and FSC-DIR-40-005 should be taken into account. The company shall not ignore known and available sources of information in addition to the ones listed in normative documents.</p>	

Code	INT-DIR-40-005_06 (also published under FSC-STD-40-005 with code INT-STD-40-005_10)
Requirement (s)	ADVICE-40-005-01
Publication date	9 July 2014
<p>Does the concept of ‘minimally disturbed by human economic activity’ in the definition of Intact Forest Landscape include fire suppression?</p> <p>Regarding definition of Intact Forest Landscape, firefighting or prevention for the protection of public safety is not considered an economic activity. Fire control in the context of forest management activities is not considered to be an economic activity of minimal disturbance.</p>	

Code	INT-DIR-40-005_11 (also published under FSC-STD-40-005 with code INT-STD-40-005_16)
Requirement (s)	ADVICE-40-005-04
Publication date	10 October 2014
<p>If a certified company sources material that has previously been FSC certified or covered by another company’s FSC Controlled Wood verification program but has since been traded by a non-certified company (therefore breaking the Chain of Custody), can this material be considered controlled with-out conducting a full verification program and risk assessment?</p> <p>For previously FSC-certified material from a broken Chain of Custody to be considered as FSC Controlled Wood, the company must trace the material back to the certified company that traded it to the non-certified company where the Chain of Custody was broken, and conduct an audit of the supply chain. This audit shall demonstrate with verifiable documentation that the material is identifiable and traceable and has not been mixed with uncontrolled material.</p> <p>For previously controlled material from a broken Chain of Custody to be considered as FSC Controlled Wood, the district of origin must be determined within/through the company’s own Controlled Wood verification program, for which all relevant normative requirements apply. For this purpose, risk assessments performed by other entities (e.g. a supplier with a valid FSC certificate that includes FSC Controlled Wood in its scope that sold FSC Controlled Wood (without a claim) to a non-certified entity) may be used as additional sources of information.</p>	

Code	INT-DIR-40-005_12 (also published under FSC-STD-40-005 with code INT-STD-40-005_18)
Requirement (s)	ADVICE-40-005-07
Publication date	28 October 2014
<p>Shall the outcomes of a company verification program according to Annex 3 be made publicly available?</p> <p>No, currently there are no requirements for publishing the outcomes of verification according to Annex 3. The standard does not limit such an opportunity, however.</p>	

Code	INT-DIR-40-005_05 (also published under FSC-STD-40-005 with code INT-STD-40-005_09)
Requirement (s)	ADVICE 40-005-07, ADVICE 40-005-02
Publication date	9 July 2014
<p>With regards to Category 3 (HCV), what is the minimal level of detail for describing the sourcing in the district of origin in the published company risk assessment? If the district of origin includes potentially controversial sources, when the company describes their sourcing in this area, must the description of their sourcing explicitly state that they are not sourcing from controversial FMUs in that district?</p> <p>The minimum required information to be included in the publically available results of the risk assessment are provided in ADVICE 40-005-07 of FSC-DIR-40-005, which applies to all CW categories. In case of potentially controversial activities in FMUs located in a low risk district (See ADVICE 40-005-02 of FSC-DIR-40-005), a company should mention the existing FMUs with potential controversial activities in the publically available results of a risk assessment.</p>	

Code	INT-DIR-40-005_03 (also published under FSC-STD-40-005 with code INT-STD-40-005_05)
Requirement (s)	ADVICE-40-005-07
Publication date	5 February 2014

Which process shall be implemented if a certified FMU is under suspension in a district that has been designated as low risk for all CW categories either by a National Risk Assessment or by a COC Certificate Holder in their FSC Controlled Wood verification pro-gram when the COC Certificate Holder wants to source from this FMU?

At the moment of suspension, the products sold by the certified FMU* are losing their FSC status. As the FMU is located in a designated low risk district for CW, the products may still be sourced as “controlled material” under the following conditions:

1. As some or all CW categories may be affected by activities that led to the suspension of the FMU, the COC Certificate Holder shall review and if necessary revise their risk assessment for the area of the suspended FMU.
2. The review/revision of the risk assessment shall be completed by the COC Certificate Holder within a period of two months from the date of suspension of the FMU certificate.
3. The COC Certificate Holder shall submit the reviewed/revise risk assessment to their CB for verification.
4. The reviewed/revise risk assessment shall be verified by the CB no later than one month after the COC Certificate Holder has submitted its reviewed/revise risk assessment, before it can be applied (see FSC-STD-40-005 V2-1 Clause 11.1).
5. As the whole district is considered low risk, the products sourced from the suspended FMU are considered controlled until the verification of the reviewed/revise risk assessment is completed by the relevant CB.
6. The outcome of the review/revision process including verification by the relevant CB will then determine the risk designation for the suspended FMU.
7. Material sourced from the area shall be classified as unspecified risk, if the timelines of review/revision and verification of the risk assessment (2, 4) is not met.

* according to the standard FSC-STD-01-001 or FSC-STD-30-010

Code	INT-DIR-40-005_01
Requirement (s)	ADVICE-40-005-07
Publication date	16 July 2010
<p>In the previous FSC-ADV-40-016, section C.1 stated that risk assessments must be made available in one of FSC's official languages. However, ADVICE-40-005-07 in FSC-DIR-40-005 the requirement to use one of FSC's official languages is not included. Can you confirm that an official FSC language is not required anymore for risk assessment public summaries?</p> <p>Yes, based on the current directive, risk assessment public summaries do not need to be posted in the FSC database in an official FSC language (English or Spanish).</p>	

Code	INT-DIR-40-005_13
Requirement (s)	ADVICE-40-005-09
Publication date	2 March 2015
<p>ADVICE-40-005-09 indicates that “Companies will have a period of up to 12 months after the approval date to align their controlled wood verification programs to the approved risk designation by a National Initiative.” In many cases, this means a company risk assessment that designated low risk now needs to be aligned with a National Risk Assessment that designates unspecified risk. In these cases, does the certificate holder need to implement field verification according to Annex 3 of FSC-STD-40-005 V2-1 for areas of unspecified risk prior to the one-year transition date?</p> <p>Yes. When risk designations by an FSC Network Partner are approved, the certificate holder shall update its risk assessment to the outcomes of the NRA. Field verification according to Annex 3 of FSC-STD-40-005 V2-1 shall be implemented for areas of unspecified risk after the risk assessment is updated and shall be completed prior to the one-year transition date (12 months after the date of the approval of the NRA).</p>	

Code	INT-DIR-40-005_08 (also published under FSC-STD-40-005 with code INT-STD-40-005_12)
Requirement (s)	ADVICE-40-005-09, Clause 3 (Advice)
Publication date	9 July 2014
<p>Is a CoC-certified harvesting company that DOES NOT own or manage the forest required to conduct a nature value assessment when conducting a risk assessment according to Annex 2 of FSC-STD-40-005, when a nature value assessment is required by the respective National Forest Stewardship Standard?</p> <p>No, a company that is conducting a risk assessment according to Annex 2 of FSC-STD-40-005 (V2-1) is not required to perform a nature value assessment, unless it is required by an approved national guidance as per Annex 2, part A, Clause 2 of FSC-STD-40-005 and/or as per FSC-DIR-40-005-09, Clause 3 (Advice).</p>	

Code	INT-DIR-40-005_10 (also published under FSC-STD-40-005 with code INT-STD-40-005_14)
Requirement (s)	ADVICE-40-005-17
Publication date	9 July 2014
<p>Can timber of unknown origin collected from beaches be evaluated according to the standard FSC-STD-40-005?</p> <p>No, timber collected from beaches is not eligible for evaluation under the FSC Controlled Wood Standard FSC-STD-40-005 V2-1.</p>	

Code	INT-DIR-40-005_09 (also published under FSC-STD-40-005 with code INT-STD-40-005_13)
Requirement (s)	ADVICE-40-005-18
Publication date	9 July 2014
<p>Can a district of origin cover more than one country? If so, is a separate risk assessment required for each country, given the heterogeneity in assessing risk between two different sets of laws? What about within countries where the sub-national units (states, provinces, etc.) have the independence to create their own resource use and protection laws?</p> <p>According to its definition, a 'district' is considered to be a generic geographical definition within a country. Subject to the above, various guidance and requirements are provided stating that how a district shall be established depends on the CW category under assessment. In the case of National Risk Assessments (NRAs) it is possible to develop shared NRAs for countries sharing homogenous conditions (e.g. sharing the same ecoregions), according to the procedure FSC-PRO-60-002 V2-0 (FSC Controlled Wood Risk Assessments by FSC accredited National Initiatives, National and Regional offices).</p> <p>Subject to the specific conditions of each CW category, the division of a country into sub-national units (e.g. states, provinces) will only impact how a district is defined if those divisions result in increased heterogeneity of the level or type of risk that is assessed within them.</p>	

Code	INT-DIR-40-005_07 (also published under FSC-STD-40-005 with code INT-STD-40-005_11)
Requirement (s)	ADVICE-40-005-19
Publication date	9 July 2014
<p>In cases where there is an approved national risk assessment, is it acceptable for the certificate holder to use the National Risk Assessment to satisfy the controlled wood requirements for conducting a risk assessment as specified in FSC-STD-40-005 and FSC-DIR-40-005, rather than having to generate its own risk assessment?</p> <p>The use of approved National Risk Assessments (NRAs) for sourcing Controlled Wood according to FSC-STD-40-005 is mandatory. Certificate holders have different options for aligning their verification programs with the results of applicable NRAs. Certificate holders may, for example, use NRAs available on FSC's website and/or the Global Forest Registry, or generate or update a new or existing company-developed risk assessment with the risk designation(s) provided in relevant NRAs. These examples are not exhaustive.</p>	



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Интерпретации, добавленные 16 января 2018 г.

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Интерпретации к стандарту [FSC-STD-40-005 \(V3-0 и V3-1\)](#) «Требования к закупкам FSC-контролируемой древесины»

Код	INT-STD-40-005_21
Требование(я)	FSC-STD-40-005 V3-1 п. 4.8; Приложение В, п. 1.2
Дата публикации	16 января 2018
<p>Должна ли организация проводить публичные консультации перед началом абсолютно каждой лесохозяйственной деятельности, описанной в СДД, согласно пункту 1.2 Приложения В стандарта FSC-STD-40-005 V3-1?</p> <p>Нет, не ожидается, что организация будет проводить публичные консультации перед началом абсолютно каждой лесохозяйственной деятельности. Частота консультаций должна быть адекватна и пропорциональна риску, наносимому данной хозяйственной деятельностью, и должна определяться организацией.</p>	

Код	INT-STD-40-005_22
Требование(я)	FSC-STD-40-005 V3-1, Приложение А, 3-я категория контролируемой древесины, п. 3.9, индикатор 3.2
Дата публикации	16 января 2018
<p>Когда организация проводит консультации с заинтересованными сторонами с целью продемонстрировать существенную поддержку низкого риска со стороны национальных/региональных заинтересованных сторон на оцениваемой территории поставок, данные заинтересованные стороны могут не отвечать. Можно ли считать, что отсутствие ответов в рамках консультаций с заинтересованными сторонами является доказательством существенной поддержки низкого риска?</p> <p>Нет, отсутствие ответов в рамках консультаций с заинтересованными сторонами не может считаться доказательством существенной поддержки низкого риска. Поддержка низкого риска должна быть продемонстрирована утвердительным ответом заинтересованных сторон.</p>	

Код	INT-STD-40-005_23
Требование(я)	FSC-STD-40-005 V3-1, Приложение А

Дата публикации	16 января 2018
<p>В FSC-STD-40-005 V3-1 Приложении А, 3-я категории контролируемой древесины, п. 3.9 (Примеры источников для получения информации, индикатор 3.1) говорится: <i>Леса, лесистые территории или экорегионы мангровых лесов, определенные Всемирным фондом защиты дикой природы (WWF) как 200 глобальных экорегионов и классифицированные WWF как находящиеся под угрозой уничтожения или в критическом состоянии. Если регион из перечня 200 глобальных экорегионов включает в себя более одного наземного экорегиона, этот входящий экорегион может быть признан районом низкого риска, если субэкорегион имеет иной статус нежели «находящийся под угрозой уничтожения» или «в критическом состоянии»</i> www.worldwildlife.org/science/wildfinder</p> <p>Использование союза «и» сужает требование до 200 глобальных экорегионов, которые также оценены WWF как имеющие охранный статус «находящийся под угрозой уничтожения» или «в критическом состоянии». В противном случае союз «или» был бы использован. Таким образом, верно ли что, регион, который был оценен WWF как «в критическом состоянии по угрозой уничтожения», больше не должен рассматриваться как потенциальный ЛВПЦ, за исключением случаев, когда это еще и регион из 200 глобальных регионов?</p> <p>Стандарт требует рассмотрения «ВПЦ, значимых на экорегиональном уровне» и не сужает понимание экорегионов до 200 глобальных экорегионов. Общие ссылки в стандарте отправляют к источники информации WWF, не ограничивая это 200 глобальными экорегионами (FSC-STD-40-005, Приложение 1, определение экорегиона). Таким образом информация об экорегионах под угрозой, отличных от тех примеров, что приводятся в FSC-STD-40-005 V3-1, должна учитываться. Организация не должна игнорировать известные и доступные источники информации, существующие дополнительно к перечисленным в нормативных документах.</p>	

Интерпретации по проведению оценки цепочки поставок по стандарту [FSC-STD-20-011 V4-0](#)

Код	INT-STD-20-011_20
Требование(я)	FSC-STD-20-011 V4-0 п. 4.8, п. 6.2
Дата публикации	16 января 2018
<ol style="list-style-type: none"> 1. На сегодняшний день организация сертифицирована по стандарту FSC-STD-40-005 V2-1 и планирует перейти на версию V3-1. Однако на данный момент она не закупает контролируемый материал и не планирует этого до даты проведения аудита. В этом случае может ли аудит по переходу на FSC-STD-40-005 V3-1 быть проведен по СДД, которая есть в наличии у организации до момента фактической закупки? 2. Если аудит по переходу на новые требования может быть проведен по СДД до момента закупки, требуется ли последующий аудит после начала закупочной деятельности для того, чтобы проверить соблюдение СДД? Кроме этого, нужен ли дополнительный аудит, если изменяется уровень риска для территории поставок с «низкого» на «установленный/неопределенный»? 3. Нужен ли дополнительный аудит, если организация изменяет область 	

действия СДД между аудитами для того, чтобы закупать контролируемый материал с новых территорий поставок?

1. Аудит по переходу на требования FSC-STD-40-005 V3-1 можно проводить по СДД, которая есть в наличии у организации до момента фактической закупки.
2. Наличие дополнительного аудита после начала закупочной деятельности зависит от уровня риска, выявленного в СДД:
 - а) Если в оценке рисков по источнику происхождения выявлен низкий риск, а риск смешивания согласно СДД отсутствует, то после начала закупочной деятельности дополнительный аудит не требуется.
 - б) Если в оценке рисков по источнику происхождения нельзя подтвердить низкий риск и/или существует риск смешивания, то потребуется дополнительный аудит.
 - в) В случаях, если в оценке рисков компании, или в расширенной оценке рисков компании изменяется уровень выявленного риска для территории поставок, орган по сертификации должен оценить актуальность, эффективность и адекватность СДД, а также проверить, пересмотрела ли организация свою СДД и внесла ли соответствующие изменения.

ПРИМЕЧАНИЕ 1: Проверка СДД может включать дополнительный полевой аудит, или полевой аудит может быть заменен на камеральный. Орган по сертификации может решить это самостоятельно в зависимости от области и масштаба деятельности организации и объема изменений в СДД.

ПРИМЕЧАНИЕ 2: В обычных случаях (когда аудит по переходу на новые требования проходит по используемой СДД и/или когда отсутствуют закупки с новых территорий поставок в период между оценочным аудитом по переходу на новые требования и последующими надзорными аудитами) дополнительный аудит не требуется, если уровень риска выявлен согласно недавно одобренной оценке рисков FSC.

3. Когда организация меняет область действия СДД (в период между аудитом по переходу на новые требования и последующими надзорными аудитами) для того, чтобы закупать контролируемый материал с новых территорий поставок, проведение дополнительного аудита зависит от уровня риска на данной территории поставок:
 - а) Если в оценке рисков по источнику происхождения выявлен низкий риск, а риск смешивания, связанный с данной новой территорией, отсутствует, то после начала закупки с новой территории дополнительный аудит не требуется.
 - б) Если в оценке рисков по источнику происхождения выявлен риск, отличный от низкого, и/или существует риск смешивания, связанный с новой территорией поставок, то дополнительный аудит потребуется.

Код	INT-STD-20-011_21
Требование(я)	FSC-STD-20-011 V4-0 Таблица B, FSC-STD-40-005 V3-1 п. 2.1
Дата публикации	16 января 2018

Должна ли организация проверять потенциальных поставщиков, на данный момент не включенных в СДД, и включать это в резюме результатов, полученных организацией при полевой проверке?

Если организация на этапе оценки рисков решает исключить некоторые участки, тогда согласно FSC-STD-40-005 V3-1 не требуется включать эту информацию в резюме СДД. Потенциальные поставщики пока не являются частью СДД. Однако если полевая проверка, выполненная как контрольная мера, приводит к исключению одного или более

участков поставок, поставщиков или субпоставщиков из СДД организации, это должно быть отражено в резюме результатов проверки согласно FSC-STD-40-005 V3-1 подпункт 6.2(d), т.к. это является эффективным применением контрольной меры для работы с установленным риском.

Код	INT-STD-20-011_22
Требование(я)	FSC-STD-20-011 V4-0 п. 6.2, FSC-STD-40-005 V3-1 Приложение Е
Дата публикации	16 января 2018

Если организация разработала контрольную меру, выполняемую без выезда на место, может ли орган по сертификации оценить контрольную меру на уровне леса, если примеры в Приложении Е Таблице В предлагают контрольную меру, основанную на выездной проверке?

FSC-STD-40-005 V3-1 Раздел 4 (Снижение рисков) не уточняет тип контрольных мер, которые должны быть разработаны организацией. Приложение Е FSC-STD-40-005 V3-1 является информативным и включает в себя руководства и примеры, но не нормативные требования. Однако если контрольная мера по выездной проверке была разработана органом по сертификации в рамках его системы по оценке актуальности, эффективности и адекватности СДД, согласно п. 6.2, тогда орган по сертификации может провести проверку контрольной меры как выездную проверку.