

FREQUENTLY ASKED QUESTIONS

FAQ ON FSC-STD-30-005 V2-0 FOREST MANAGEMENT GROUPS

Version 1

Published: 15 July 2022



**FORESTS
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Title: FAQ on FSC-STD-30-005 V2-0 Forest Management Groups

Dates: **Approval date:** 15 July 2022

Contact for comments: FSC International – Performance and Standards Unit
Adenauerallee 134
53113 Bonn
Germany

Email: communityfamilyforests@fsc.org

Version control

Publication date: 15 July 2022

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INTRODUCTION

This document provides responses to some frequently asked questions related to the revised standard *Forest Management Groups* FSC-STD-30-005 V2-0.

All questions have been compiled from stakeholders during the international webinars and the training and workshops in Iberia carried out during 2021 to support the roll-out and uptake of the revised Forest Management Groups standard.

The Community and Family Forests Program of FSC is committed to supporting the implementation of its policy solutions. If you would like further information or assistance, please do not hesitate to [contact the Program](#) to discuss together how best we can help you.

These FAQ do not have a normative character and are meant to clarify the use of the Forest Management Groups standard (FSC-STD-30-005 V2-0).

[Interpretations to standard FSC-STD-30-005 V2-0](#) are not included in these FAQ. The normative framework of FSC (policies, procedures, standards, guidance, interpretations, directives, advice notes) do have a normative character and supersede these FAQ.

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OBJECTIVE

The objective of this document is to provide informative responses to some frequently asked questions related to the revised standard *Forest Management Groups* FSC-STD-30-005 V2-0.

REFERENCES

The following referenced documents are relevant for the application of this document.

For references without a version number, the latest version of the referenced document (including any amendments) applies:

FSC-STD-01-001 V5-2	FSC Principles and Criteria
FSC-STD-20-007 V3-0	Forest Management Evaluations standard
FSC-STD-20-007a V1-0	Forest Management Evaluations Addendum – Forest Certification Reports
FSC-STD-20-007b V1-0	Forest Management Evaluations Addendum – Forest Certification Public Summary Reports
FSC-STD-30-005 V2-0	Forest Management Groups standard
FSC Interpretations	Interpretations Forest Management

ABBREVIATIONS

CAR	Corrective action request
CoC	Chain of Custody
ES	Ecosystem Services
FM	Forest management
FSC	Forest Stewardship Council
NTFP	Non-timber forest product
P&C	FSC Principles and Criteria (FSC-STD-01-001)
PSU	Performance and Standards Unit
SLIMF	Small or low intensity managed forest

FREQUENTLY ASKED QUESTIONS (FAQ)

PART I ESTABLISHMENT OF FOREST MANAGEMENT GROUPS

1. Can non-SLIMF management units conform with Criterion 6.5 fully on behalf of SLIMF management units?

Yes. The SLIMF management units of the group can delegate conformity with Criterion 6.5 (P&C V5-2) to other management units of the group, including the non-SLIMF management units.

NOTE: The Group Entity can decide how the group members conform with Criterion 6.5 so long as the requirements from the FSC-STD-30-005 V2-0 and the applicable Forest Stewardship Standard are conformed with.

See FSC-STD-30-005 V2-0, Clause 4.2, and Box 5

2. May conformity with Criterion 6.5 for SLIMF management units be achieved through conservation actions outside of the group? In the past this was permitted where all management units are SLIMF.

Yes. This is allowed for management units smaller than 50ha under the FSC Interpretations for Forest Management ([INT-STD-01-001_09](#)). There are specific provisions provided in the interpretation that must be conformed with to allow for conformance outside of the management units of the group. Please, consult the interpretation for the details.

See INT-STD-01-001_09 (a)

3. The standard specifies that each management unit shall by default conform to Criterion 6.5 by its own and only if not possible, for SLIMF, they can share the responsibility. Who decides what is possible or not or must there be representative sample areas of native ecosystems to be forced to conform by its own?

Clause 4.2 allows for the SLIMF management units to delegate conformity with Criterion 6.5 to other management units of the group. However, if representative sample areas of native ecosystems exist in these SLIMF management units, these need to be conserved according to the applicable Forest Stewardship Standard. If such representative sample areas don't exist within the SLIMF management units, other management units can conform with Criterion 6.5 on their behalf.

The decision on the possibility to conform with Criterion 6.5 across management units is to be made by the Group Entity and requires approval by the certification body.

See FSC-STD-30-005 V2-0, Clause 4.2

4. Is it possible to have group members with different types of products, e.g., timber, NTFP and ES?

Yes. There is no restriction in this regard and some management units of the group can be managed to produce timber and others can be managed to produce non-timber forest products, for instance. It is important that the Group Entity indicates the main products of the group in its totality in the scope of certification.

See FSC-STD-30-005 V2-0, Clause 10.1

5. Is a signed declaration of consent required from existing group members to cover for the revised requirement for members' declaration of consent from the FSC-STD-30-005 V2-0?

No. The clause specifically requires a signed declaration of consent from each member wishing to join a group certificate (new members).

The declaration of consent from existing members, according to the previous version of the standard, didn't require the member's signature, and could be obtained by other means. This is still valid so long as the extended consent is verifiable (e.g., through a member general assembly or as an addition to the existing declaration of consent, etc.).

See FSC-STD-30-005 V2-0, Clause 10.1

PART II GROUP MANAGEMENT SYSTEM

6. **What is the plan for FSC International to "determine that there is a high risk of false claims involving material harvested from groups"? Is FSC going to set up a webpage on "high risk of false claims involving material harvested from groups"? When is it going to start to work?**

FSC is working on a risk-based approach to identify those supply chains or certificate holders where there is a high risk of false claims. Once we start using the model and high-risk supply chains or certificate holders are identified, FSC will communicate this to the relevant certification body, which will then communicate it further to its certificate holders.

See FSC-STD-30-005 V2-0, Clause 10.3

7. **There are two possibilities regarding false claims:**

1. **Total harvesting volumes exceed the annual allowable cut.**
2. **Total sales volumes exceed harvesting volumes.**

How does FSC control these false claims?

In the context of the FSC-STD-30-005 V2-0, the Group Entity is required to have a system for tracking and tracing FSC certified forest products for the group. Furthermore, the Group Entity is required to keep records of the actual or estimated annual harvesting volume of the group and actual annual FSC sales volume **of the group**.

Additionally, in countries where FSC International has determined a high risk of false claims involving material harvested from groups, the Group Entity is required to maintain up-to-date records of the harvesting and FSC sales **volumes of each management unit** in the group (Clause 10.3).

See FSC-STD-30-005 V2-0, Clauses 10.1, 10.3 and 12.1

8. **How is the Group Entity supposed to adapt the management system of the group according to annual internal monitoring results?**

The revised FSC-STD-30-005 V2-0 provides a new requirement for the Group Entity to analyse and use the results of the annual internal monitoring to adjust and improve the group management system. If during the internal monitoring the Group Entity finds non-conformities, it must analyse whether these are related to the management system itself and, if so, adjust the system so that the non-conformities do not happen again in the future. This is the practical application of 'adaptive management'.

See FSC-STD-30-005 V2-0, Clause 11.1

9. **How will the internal monitoring for Resource Management Units be consistently evaluated by certification bodies?**

The Group Entity can choose how to internally monitor the management units that are included in Resource Management Units (RMU) (clause 11.4). To use this possibility, the Group Entity is required to:

"[...] be able to demonstrate to the certification body that the internal monitoring methodology defined for their group will allow them to verify that the group management units are in conformance with the applicable Forest Stewardship Standard, and that non-conformities will be identified."

The certification body will evaluate that the defined internal monitoring intensity is sufficient to identify non-conformities and to evaluate conformity at the management units of the group. For instance, if the results of the certification body evaluation are very different from the results of the internal monitoring, this could be an indication that the internal monitoring is not adequate.

NOTE: Certification bodies conform with the requirements for evaluating certificate holders provided in standard FSC-STD-20-007.

See FSC-STD-30-005 V2-0, Clause 11.4, and Box 6

10. Does the certification body evaluate a new member added between two annual audits prior to being added?

No, the certification body would not evaluate new members added in-between audits prior to being added, this would be done by the Group Entity. To add new members to the group, the Group Entity is required to evaluate them and ensure no major non-conformities exist in their management units. Once the new member is evaluated by the Group Entity and included in the group, the certification body will evaluate it as part of the group in its annual audits and might visit its management units as part of a sample.

The certification body requirements for evaluating group certification and individual members are laid out in standard FSC-STD-20-007.

See FSC-STD-30-005 V2-0, Clause 7.1

11. What is the rationale for not being allowed to use sub-certificate codes on sales invoices? This puzzles some certificate holders who think it adds even greater accuracy.

Sub-certificate codes may be issued and used by the Group Entity for internal purposes. For instance, sub-certificate codes could be used as internal reference on the invoices if the Group Entity wishes to do so.

However, all the invoices issued by the Group Entity or any group member (and forestry contractor included in the scope of certification) need to carry the certificate code of the group certificate. Sub-certificate codes are not included into the FSC database and provide no means for buyers to verify that they are purchasing FSC certified forest products from an entity with valid FSC certification.

See FSC-STD-30-005 V2-0, Clause 10.1, and Terms & Definitions

12. If an auditor issues a corrective action request (CAR), and the group member blames the contractor and the contractor blames the group member, how is the dispute resolved and which entity covers the cost of responding to the CAR?

The Group Entity must define the responsibilities and how they are allocated among the different actors of the group. When a certification body identifies a non-conformity, this will be related to a specific requirement, and the management system of the group must indicate who is responsible for conforming with such requirement. If these responsibilities are defined, this will solve the situation and indicate who is responsible for the non-conformity and should implement the CAR and cover the associated costs. If the responsibilities are not adequately defined, then it might result in a non-conformity by the Group Entity itself and against the management system of the group.

Further content on the matter can be found in the FSC Interpretations for Forest Management ([INT-STD-20-007_59](#)).

See INT-STD-20-007_59

13. How would the active/inactive distinction apply when the group has multiple products and ecosystem services?

The standard specifies that “the Group Entity shall specify what constitutes an active management unit for the group”. By definition, the active management unit is:

“A management unit where site-disturbing activities have taken place since the last evaluation implemented by certification bodies, or in the previous 12 months if there was no previous evaluation.”

When defining what constitutes active management for its group, the Group Entity will also define which management activities for each of the products or ecosystem services are considered site-disturbing. Once this has been defined, if **any** of such site-disturbing activities has taken place since the last evaluation, or in the previous 12 months, then the management unit will be categorized as active.

NOTE: The Group Entity may decide not to specify which management units have been ‘active’ and which ‘inactive’ since the last evaluation. By default, all management units would then be treated as ‘active’ management units.

See FSC-STD-30-005 V2-0, Clause 11.3 and Terms & Definitions

PART III OPTIONAL INCLUSION OF FORESTRY CONTRACTORS

14. Could a pest control company join to the group as a “contractor” to ensure conformance with FSC Pesticides Policy?

Yes. The term ‘forestry contractor’ in the context of the standard covers various types of people and organizations providing services to the FM/CoC Group Entity or group members either directly or through sub-contracting. The definition states that a forestry contractor can be:

*“Person or group of persons legally registered (e.g., consultant, company) that takes responsibility for providing forest logging, **silvicultural or other management activities on the ground** on the basis of a contractual agreement with a Group Entity, Resource Manager(s) or group member(s).”*

See FSC-STD-30-005 V2-0, Terms and Definitions

15. Since contractors can now be in FM groups, do they need to include a disclaimer if using promotional (off-product) trademarks and working on both certified and uncertified management units?

No. The Group Entity needs to develop provisions for the use of trademarks by members and forestry contractors included into the scope of FM/CoC group certification in the Group Rules. The Group Entity is responsible for ensuring that all use of FSC trademarks is conforming with trademark use requirements.

See FSC-STD-30-005 V2-0, Clause 9.1i)

16. If a contractor is a member of group A, and then harvests timber from another certified group B, can they then sell the timber from group B, and if so, under what code?

Forestry contractors can join several FM/CoC group certifications. The contractor’s operations within the scope of group A are limited to the management units within group A. The same applies to other groups where they operate. For forest products harvested and sold from group A, the forestry contractor would use the certificate code of group A to sell and pass on the FSC claim. The contractor cannot use the certificate code of group A to sell and pass on the FSC claim for forest products harvested from group B.

To sell the timber from group B, the contractor can:

- Use the code of group B – IF the contractor also is a member of group B;
- OR
- Use its own code, provided the contractor holds its own independent CoC certification.

See FSC-STD-30-005 V2-0, Clause 13.1

17. How are non-conformities assigned if they are a result of poor performance from the contractor?

For internal non-conformities, the Group Entity must analyse the cause and responsible actor for the non-conformity and issue an internal corrective action request. If the non-conformity can be traced back to a forestry contractor and does not constitute a group level non-conformity (e.g. is not a result of inadequate information sharing or training by the Group Entity), a corrective action request will be issued to the contractor and its implementation followed up by the Group Entity.

In the case of external evaluations by certification bodies, if a non-conformity is found, the certification body will analyse the cause and the responsible for the task. If it was a responsibility of the contractor, then the non-conformity will be issued to the contractor, and the implementation will be followed up by the certification body.

See FSC-STD-30-005 V2-0, Clause 18.2

18. How will contractors be reflected in the group certificate/ FSC database? Will they have 'several certificates' if a contractor is a member in several groups?

The FSC database is updated using the certification reports submitted by the certification bodies. There is an interpretation in the FSC Interpretations for Forest Management (INT-STD-20-007b_06) that requires certification bodies to include information about forestry contractors in the database. For the details, please see the interpretation.

The contractors will not be issued their own certificates when joining a group, they will be included into the scope of the FM/CoC group certificates which are issued to the respective Group Entity.

See FM Interpretations, INT-STD-20-007b_06

19. May the Resource Manager be a 'forestry contractor' through a contractual agreement with the Group Entity?

Yes. The definition for a Resource Manager allows for a forestry contractor to act as a Resource Manager if they assume the overall responsibility for ensuring conformity with the applicable FSS requirements on behalf of the members whose management units would be included under the Resource Management Unit managed by the contractor.

"A person or legal entity to which some or all group members have given the responsibility to ensure conformance with the applicable Forest Stewardship Standard. In a group, the Resource Manager and the Group Entity may be the same person / legal entity. The Resource Manager oversees the operational forest management activities but does not assume ownership of the forest resources."

See FSC-STD-30-005 V2-0, Terms & Definitions

20. How can certification bodies know if contractors are included in more than one FM/CoC group certificate?

As per INT-STD-20-007b_06, certification bodies are required to include the same information about forestry contractors included into the scope of FM/CoC group certificates as what is included for non-SLIMF members of the group. This information will then be uploaded to the FSC database where anyone can verify to which certificates contractors have been included.

See INT-STD-20-007b_06

21. How can contractors meet the long-term land use and ownership rights requirements (required by FSC's Principle 1), if they only have the right to harvest the forest in a short period of time?

When joining a group, forestry contractors are included into the scope of the FM/CoC group certification as service providers. The FSC Principles and Criteria and their long-term commitment apply to the Group Entity and/or the group members. Since contractors join the group as service

providers, the long-term commitment to the land use does not apply to them, they are not the owners/leaseholders of the management units.

The responsibility of the long-term commitment lays with the owner/leaseholder (the group member, or the Group Entity if this responsibility has been delegated), who must make sure that this commitment is respected and enforced by the contractors and any other service provider that goes to the management unit for any management activities.

The contractor doesn't have any 'right' to the management units, they are hired to provide services to manage them.

See FSC-STD-30-005 V2-0, Clause 13.2

22. If the contractors included into the scope of FM/CoC certification already hold a separate CoC certificate, could we apply a lower sample size due to lower risk?

No. The contractors' potential CoC certified status does not affect the sampling intensity in FM/CoC group certification in any way. The fact that a lower risk can be associated to the management units where outsourced services are carried out only by forestry contractors included in the group has already been taken into consideration for the calculation of the minimum sample in Table 2 of the standard.

The Group Entity may lower the calculated minimum sample based on the regular analysis of the results of the monitoring (and subsequent improvement of the management system), as indicated in Clause 11.7.

NOTE: The contractors may hold a separate CoC certificate whilst at the same time be included into the scope of FM/CoC group certification.

See FSC-STD-30-005 V2-0, Clause 17.1, 11.7

23. Do contractors need to meet the FSC-STD-40-004 requirements when being included into the scope of FM/CoC Group certification?

No. Forestry contractors included into the scope of an FM/CoC group certificate need to follow the Group Rules and conform with all applicable responsibilities allocated to them by the Group Entity. FSC-STD-40-004 does not apply in FM/CoC group certification.

See FSC-STD-30-005 V2-0, Clause 13.3

24. Can a concentration yard for round wood be included into the scope of the certificate?

Yes. If the ownership of the round wood is still with an actor included in the scope of the certificate, it can be covered by the scope of the FM/CoC group certification.

See FSC-STD-30-005 V2-0, Section E, Definition for 'Forest gate'



FSC International – Performance and Standards Unit
Community and Family Forests Program
Adenauerallee 134
53113 Bonn
Germany

Email : communityfamilyforests@fsc.org