



Frequently Asked Questions

FAQ ON FSC RISK ASSESSMENTS

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Title:	FAQ on FSC Risk Assessments
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DEVELOPMENT OF A RISK ASSESSMENT DRAFT

Source types and geopolitical scales

1. Can 'eco-regions' be utilized to assess risks?

Yes, risks can be assessed in eco-regions. Same as with any other geopolitical scale, they should be explained and justified. In general, it needs to be a choice relevant and feasible to the area under assessment, which means that there is enough information to assess risks based on the chosen scale.

2. When mapping the information, would it be possible to use a source type (e.g., native and planted forests) to do so instead of geopolitical scales?

Both geopolitical scale and source types are required to be determined (as per Clauses 12.1 and 12.2 of <FSC-PRO-60-006b Risk Assessment Framework>). Independently of the geopolitical scale and source type chosen, it is important to have enough information to assess risks, which sometimes is not the case for the source types that are used.

Requirements for mapping following Clause 12.6 of <FSC-PRO-60-006b Risk Assessment Framework> is only required at geopolitical scale.

3. How are the geopolitical scales and source types used in the assessment of indicators? Are the indicators analyzed for each geopolitical scale and source type separately?

The indicators are analyzed according to the unique combinations of geopolitical scale and source types that the developer has specified for the risk assessment. For example, there are three geopolitical scales identified (A, B, C) and two source types identified (X and Y). Let's say that the risks for Indicator 12 might be the same ('negligible' risk) for geopolitical scales A and B (and for both source types X and Y found there), but might be 'non-negligible' for source type X within geopolitical scale C. Therefore, this indicator would have three risk designations:

- a) 'negligible' risk conclusion for geopolitical scale A and B and source types X and Y,
- b) 'non-negligible' risk designation for geopolitical scale C and source type X, and
- c) "negligible" risk conclusion for geopolitical scale C and source type Y.

4. What characteristics should be taken into account when making the decision of whether it is necessary to separate source types (e.g., state, communal, private forests, etc.), or whether they can be combined into larger ones (e.g., communal and private forests as one group, and state forests as another).

The source types that are relevant for the overall risk assessment must be clearly defined (in the template, under the tab of 'Source types'). The assessment of the indicators is made per source type and covering each of the geopolitical scales. Therefore, the source types and the geopolitical scales need to be designed considering key factors that might determine the major risk trends (e.g., size of the forest property, type of ownership, etc.), or in other words, considering relevant distinctions to understand the breakdown of risk in an area.

When it comes to the assessment of each indicator, using the example you provided, it may happen that based on the available evidence, there is non-negligible risk for communal and private forests, so the risk conclusion can be expressed as one for both source types. In this sense, they can be grouped together in the risk conclusion.

5. Regarding the source-types that are coming from outside the forests, also often called the 'non-forest' types (e.g., salvaged wood, agricultural production and residues such as from orchards, urban area and land infrastructure maintenance such as cutbacks of shrubs and trees along roads, in parks etc.), do these types have to be covered by the Risk Assessment as well?

Yes, all potential source types within the scope of the Risk Assessment are to be included, this includes by default those that have their origin outside the forest lands. There should always be additional information describing the types of material this source type is considering. In the template, this information has to be provided in the "description" column with comments in the 'other comments.'

6. For the source type(s) covering the wood from outside of forests (non-forest), it might not be possible to find detailed and specific information. Would it be sufficient for the assessment to only cover general assumptions about legality and the other four aspects of Controlled Wood (CW) categories?

In cases where there are few resources pertaining specifically to a given element (like a source type), risk assessment authors are welcome to include other references that are relevant for coming to a risk conclusion. Assumptions need to be supported by references. For example, in the case of informal firewood collection outside of forests, there may not be any particular statistics or hard figures, but anthropological studies might provide qualitative documentation of the phenomenon. However, the relevance of these sources must be carefully justified.

7. If we are revising a Risk Assessment that covers timber only, then this is the commodity scope of the revised Risk Assessment. Is this correctly understood?

It somewhat depends on the country, whether the commodity scope also covers relevant non-timber forest products (e.g. rubber). This scope is initially defined by the developer, based on its and/or other experts' knowledge on the country; later on this scope, together with all the other content of the risk assessment, is subject to consultation as per the development process for every Risk Assessment.

8. Can different source types (with different definitions) be used for different indicators?

You can create your own categories for types of sources. For instance, Source 1 might apply exclusively to public forests, while Source 2 could be specific to community forests, and so on. However, keep in mind that whatever approach you choose, it must be practical and effective for assessing risk across all indicators.

9. In which cases are maps not compulsory to provide together with the draft?

Maps as such, are strongly encouraged to use in the <[FSC-PRO-60-006b FSC Risk Assessment Framework](#)>. Geographical data is nevertheless compulsory to provide at the level of geopolitical scale. For example, if there are five provinces in a country, and 'province' is a relevant distinction to understanding the breakdown of risk in a country, those five provinces would each be listed on the "Geopolitical Scale" tab and geographical data provided for each – regardless of whether risk is different or the same. Several geopolitical scales might present the same source types, and the same levels of risk, but it is still required to submit geographical data for each geopolitical scale. Developers receive guidance from FSC on how to submit geographical data for the risk assessment.

Legality

10. Can we take a sample of state/regional laws when referencing general differences between them (this was done for previous Risk Assessments), or do we need to list all forest laws related to forestry that differ across states?

State or regional laws that do not influence risk designation can be sampled or grouped with the purposes of referencing general differences between them. The 'legislation' tab in the Risk Assessment Template can be used for the identification of differences and similarities between them.

11. Do we need to list all forestry laws for each of the states in our country? Only national laws are listed in our national Forest Stewardship Standard.

While the list of legislation need not be exhaustive in cases where a very granular geopolitical scale is selected, and in cases where state/provincial/regional law mirrors federal or state policy, the greater detail that can be provided, the better. In general, if regional or local forestry laws differ from national laws and can influence risk designation, then those regional or local forestry laws are also to be considered and listed.

12. Description of legal requirements: How to do this when we have 18 legislation sources for one indicator?

The description of legal requirements should consider all the legislation keys for that indicator. Instead of summarizing each individual law, a broad summary describing how the laws interact and are associated with one another is sufficient.

Risk indicator analysis

13. How should we approach determining whether a risk threshold has been met for indicators related to legal requirements? For example, Indicators 18 through 21 are related to the “management and minimization” of waste or pollution, but the risk thresholds are formulated around compliance with legal requirements. Since it’s difficult to know whether impacts are “minimized” beyond compliance with legal requirements, how should we approach these indicators?

The rationale behind the risk thresholds for indicators relating to legal compliance is that when these legal requirements are in place and properly implemented, the risks associated with these activities are reduced. Therefore, the thresholds for Indicators 18 through 21 are based on legal compliance.

Clause 13.10 of the <[FSC-PRO-60-006b FSC Risk Assessment Framework](#)>, provides more detailed guidance for assessing indicators relating to legal compliance.

14. Can a scientific justification that has a different opinion from law enforcement be considered as a sign of a weakening of the indicator?

All available evidence that is relevant and reliable should be used in the assessment of an indicator. If the developer of a Risk Assessment considers that a scientific source provides strong evidence against the findings of other sources of information or demonstrates that the risks exist for certain areas, then it should be provided in the assessment, providing a clear justification on the risk conclusion.

15. How can we assess worker rights (Indicators 21 through 41) in various contexts?

Assessment depends on factors like local legislation, ILO principles, and value chain dynamics. Where information is limited, it is recommended to engage with local experts and to use the precautionary approach when the information is not sufficient to reach a risk conclusion.

For the Risk Assessment in the forestry sector, it includes the work at all levels (office, field, etc.). When we look at these definitions of workers, we refer to what it means in FSC (the FSC glossary). The existing indicators cover every related issue.

16. Has there been any discussion on adjusting the approach on numerical thresholds for worker safety (Indicator 23) to ensure fairness across different reporting systems in the world?

As per <[FSC-PRO-60-006b FSC Risk Assessment Framework](#)>, a precautionary approach shall be applied when assessing an indicator, and a ‘non-negligible risk’ designation shall be assigned, if the following conditions are met:

- a) The assessment of Indicators 10, 11 and 12 conclude that there is a risk of corruption and fraud in the country/region in question; and
- b) Little or no evidence can be obtained to indicate that the risk is negligible.

This leads to an advantage for the countries with a robust reporting system to be able to prove a negligible risk designation.

Note: The most updated global statistics reported by [ILOSTAT \(figures for January 2024\)](#) were used to calculate the numbers for non-fatal occupational injuries as 591.5 per 100'000 workers and occupational fatalities as 2.45 per 100'000 workers. These were obtained by using the median.

17. What is the justification for the addition of Indicator 23?

As explained in the <[FSC-GUI-40-005 V1-0 EN Crosswalk of indicators between Risk Assessment Framework V1-0 and V2-0](#)> this is a new indicator that enriches the assessment of 'occupational health and safety' measures within the social dimension of sustainability, to uphold FSC's values.

Indicator 23 reads as follows (source <[FSC-PRO-60-006b FSC Risk Assessment Framework](#)>):

'Facilities and activities are safe and support worker's health, and workers have access to and use appropriate Personal Protective Equipment commensurate with the activities undertaken.'

18. In some countries, several indicators can be general to all aspects of workers. In those cases, should the Risk Assessment narrow the analysis and only focus on the timber industry (e.g., all of the Human Rights Indicators 25 through 41).

A focus on forestry workers suits more the purposes of a Risk Assessment, and of course, some aspects that apply to all workers (e.g. low minimum wages, "at will" workers contracts, etc.) certainly apply to forestry workers too. Reviewers will likely consider:

- a) How well the conditions of workers in forestry-related jobs are situated within the broader picture of risk for the whole country, and
- b) risks to a range of different kinds of workers in forestry-related industries, where relevant for the scope of the Risk Assessment, are considered.

19. How do we handle a lack of forestry-specific data for indicators?

Broader datasets, including data from related sectors like agriculture and fishing, can be used. However, experts and stakeholders should be consulted for precise insights.

It is expected to have improvements in the future, but for now, we rely on the Best Available Information (BAI). What we have now in the Risk Assessments includes reports from different types of organizations, legislation, information from stakeholders, etc. and in some cases, there is even scientific evidence. It is also recommended to include expert knowledge - give attention to talking to experts in the area and researchers who are involved in the topic.

20. How does the frequency on reporting affect the perception of compliance?

High reporting rates may not necessarily indicate better compliance but could reflect more robust law enforcement or legal systems. Regional experts must evaluate the context in these cases.

21. Is the identification of specific High Conservation Values (HCVs) an integral part of the Risk Assessment according to Indicators 58 through 63, or is it sufficient to indicate the presence or absence of these categories of HCVs in the area being assessed?

It is not enough to indicate the presence or absence of HCV categories in the area being assessed. If the occurrence of the HCV is likely, then that is already a conclusion on HCV, which has to be supported by the available evidence. It is important to also take into consideration the requirements under Clause 15.9 (source <[FSC-PRO-60-006b FSC Risk Assessment Framework](#)>):

'Where there is no FSC-approved HCV framework developed as part of the development of an FSS based on FSC P&C V5, an HCV framework for the given country/region shall be developed as part of the Risk Assessment process, including identification of areas where HCV are present and threat(s) to them posed by management activities, according to the requirements of this document.'

Important note: Where there is an FSC-approved HCV framework developed as part of the development of an FSS based on FSC P&C V5, and this HCV framework has been modified to

ensure its usability for the Risk Assessment, this modified HCV framework must be submitted to P&P together with the Risk Assessment draft as well for their approval.

22. Can Indicator 26: ‘Harvest or trade in products do not contribute to a violation of international human rights or is not associated with armed conflicts’ be assessed for geopolitical zones a) active hostilities and b) temporarily occupied territories as “non-negligible” risk?

Yes.

23. What is the recommended approach for countries with no identified risks?

Avoid creating unnecessary bureaucracy by excluding mitigation measures where risks are unequivocally absent, except in the case of Indicator 55 (refer to section 3 for more information).

Risk thresholds and designations

24. If there is a ‘non-negligible’ corruption risk, does this mean that all other indicators will also have a ‘non-negligible risk’?

No. As indicated in Clause 13.7 (source [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#)):

‘A precautionary approach shall be applied when assessing an indicator, and a ‘non-negligible risk’ designation shall be assigned, if the following conditions are met:

- a) The assessment of Indicators 10, 11 and 12 conclude that there is a risk of corruption and fraud in the country/region in question; and
- b) Little or no evidence can be obtained to indicate that the risk is negligible.’

Nonetheless, even if there is risk of corruption in the area under assessment, if there is consistent evidence available confirming that none of the non-negligible risk thresholds for the indicator under assessment are met, the indicator can be designated as negligible risk.

25. Do we need to check only one threshold or can we use three at once? Is it necessary to check all the thresholds for each indicator if at least one is already at significant risk?

The risk designation requires the evaluation of the information in identified sources against (all) the ‘non-negligible’ risk thresholds associated with each indicator (Clause 13.2 in [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#)).

26. Can the risk designation of ‘negligible’ and ‘non-negligible’ for the same violation vary depending on the geopolitical zones (Indicators 14 through 15)?

Yes, but the context would have to be well analyzed to be clearly understood. For example, if the violations are followed up by relevant entities and/or preventive actions are taken at one geopolitical scale but not at the other, that could be a reason for having two different risk conclusions.

27. If there are cases of violations, but these are usually followed up by the relevant entities, should the risk at certain indicators be considered as ‘non-negligible’?

It will depend on the type of indicator.

If this is an indicator only focusing on legality assessment, then the ‘non-negligible’ risk thresholds for those indicators have to be checked against:

- a) Identified laws are not consistently upheld by all entities, are often ignored, are not enforced by relevant authorities, or any combination thereof;

- b) Violations of identified laws are not efficiently followed up on by the relevant entities;
- c) Violations of identified laws are not followed up by preventive actions taken by the relevant entities.

If in this type of indicator (legality assessment), the violations are efficiently followed up by the relevant entities and/or preventive actions are taken, then the indicator can be designated as negligible risk.

Nonetheless, if this is a type of indicator assessing requirements beyond legislation, then risk may not be designated as 'negligible', depending on whether any of the risk thresholds are met. For example, Indicator 41 on gender equality includes the following risk thresholds:

- a) Applicable legislation for the area under assessment covers all ILO Fundamental Principles and Rights at Work, but the Risk Assessment for Indicator 40 confirms a designation of 'non-negligible risk';
- b) Applicable legislation for the area under assessment contradicts indicator requirement(s);
- c) There is substantial evidence of widespread or systematic violation of requirements covered under this indicator.

In this case, even if Indicator 40 on legality assessment for gender equality is designated as negligible risk and there is a follow up on violations by relevant entities, the violations may be systematic or widespread along the area under assessment. In such a case, it is not possible to designate the risk as 'negligible'. Another option would be to look for evidence that can prove that the systematic or widespread violation only focuses on specific geopolitical scale(s) or source type(s). In this case, a differentiation in the risk conclusion can be made.

28. If a territory of a country is temporarily inaccessible (e.g., occupied and the country legislation does not apply at the moment, or there is an area where there is active hostilities where it is impossible to conduct forest management), what should be the assessment logic?

In such case and territories, the risk can be designated as 'non-negligible'. There still has to be the assessment for each indicator based on the available evidence.

Mitigation measures

29. Is it possible to have several mitigation measures for each 'non-negligible' risk?

Yes, it is possible to establish multiple mitigation measures for each indicator. As specified under clause 14.5 in <FSC-PRO-60-006b FSC Risk Assessment Framework>: 'Mitigation measures shall be established according to each risk and source type identified.'

30. Shall there be both "mandatory" and "recommended" mitigation measures for every case where a 'non-negligible' risk is designated? What are the implications of the 'mandatory' risk mitigation measures in terms of practical application of the Risk Assessment?

In a centralized Risk Assessment, only recommended mitigation measures can be established, following Clause 14.3 <FSC-PRO-60-006b FSC Risk Assessment Framework>: 'Mandatory mitigation measures are only possible to be established when developing or revising a Risk Assessment through a major type of process according to <FSC-PRO-60-006 The Development and Revision of FSC Country Requirements>.'

31. When choosing a combination of geopolitical scale and source type during the risk description of each indicator, should we take into account the applicability of risk mitigation

measures for that combination? What other characteristics should be considered when making this decision?

Yes, that could be an aspect to consider. Also, the availability of information for the scale(s) being selected.

32. How do I define risk mitigation measures for effective protection of HCVs, corruption, etc.? Please provide examples.

Because risk mitigation measures will not only vary depending on the country situation but also according to the scope of the Risk Assessment, we do not prescribe specific guidance relating to the appropriateness of certain mitigation measures compared to others. Mitigation should consider documented evidence, stakeholder consultations, and scientific research. Reviewers will assess the proposed mitigation measures for 1) whether they address the risk threshold(s) identified, and 2) whether they match the intensity/scale of the identified risk. For example, for widespread, pervasive risks like corruption, a risk mitigation on document verification may not be enough on its own, although in combination with other risk mitigation measures depending on the country's conditions, it could be appropriate.

33. Can we develop different mitigation measures for companies aiming to comply with EUDR versus those only conforming against controlled wood?

The entire Risk Assessment Framework is already aligned against EUDR requirements. Risk mitigation measures relevant to EUDR therefore exist for those indicators that are relevant to EUDR.

Refer to the [<FSC-GUI-40-005 V1-0 EN Crosswalk of indicators between Risk Assessment Framework V1-0 and V2-0>](#) for more information on the EUDR related indicators. Please contact country_requirements@fsc.org if you have specific comments on this question.

34. If a territory of a country is temporarily inaccessible (e.g., occupied and the country legislation does not apply at the moment, or there is an area where there is active hostilities where it is impossible to conduct forest management) and the indicators for those areas have 'non-negligible' risk, could the risk mitigation measures for those indicators be as simple as 'not to buy'?

In such cases, the 'not to buy' measure can be a mitigation measure for these territories.

Use of the Risk Assessment Template

35. Is it possible to modify the template (e.g., adding columns, renaming sections and drop down list options, etc.)

Please do not modify the template by adding columns or changing names. The template is designed in a specific way that it works as input for automatically upload on to digital tools, like the soon to be launched FSC Risk Hub.

36. How many references are required, or is there a minimum?

There is not a minimum of references required by the Risk Assessment Framework. It is up to the developer to decide. Do not use data more than 5 years old, unless very well justified.

It is important to take into consideration that the consultation with experts is required. As specified in Clause 2.6 ([<FSC-PRO-60-006b FSC Risk Assessment Framework>](#)):

'The process lead shall consult experts on the draft Risk Assessment (including but not limited to selected indicators), if:

- a) there are limited publicly available sources of information to evaluate the indicator and to reach a risk conclusion;

- b) there are doubts on how risk conclusions shall be graded (e.g., whether the risk is widespread, systematic, etc.); and
- c) input is needed to establish mitigation measures.

NOTE: The expert consultation is recommended even if the above criteria are not met.'

37. Should the grammar and numbering be in British English or in American English?

For consistency with other FSC documents, the Oxford English Dictionary is the preferred reference for spelling. While there is no preferred style guide (e.g., MLA, APA, etc.) for references, numbering, or grammatical conventions, please ensure that a consistent approach is used throughout.

38. How to reference the recommended sources? There is no identifier.

Using the value in the 'Name' column is acceptable.

39. If I change a short title of a reference or a legislation, how can I update the macro so that I can see the updated title in the indicator assessment?

If a source type, geopolitical scale, reference, legislation, or expert name is changed in the tabs that feed into the 'Assessment of Indicators' tab, the value in the cell will not be updated automatically, but the drop-down menu will. Once changes are made, go again to the relevant cell and select the new name from the appropriate drop-down menu.

40. If we have an indicator with different risk designations based on different source types (e.g., for different ownerships), should we double the line/row (e.g., one row for 'negligible' and one row for 'non-negligible' risk) in the template?

Yes.

41. Can we include annexes in the Risk Assessment to provide more justification for assessments?

While we encourage you to include as much information as possible in the Risk Assessment template directly, there are some limited instances where Annexes could be appropriate. Please contact country_requirements@fsc.org to request to add Annexes.

42. In the Risk Assessment template, when the risk conclusion is 'negligible' risk, should risk threshold be chosen?

If the risk conclusion is 'negligible' risk, do not select any threshold.

43. How can an indicator be marked as 'not applicable' in the template and where should the justification for its non-applicability be added?

The indicator can be selected from the template as normal – by selecting the indicator category and the indicator from the list. In the "Risk Conclusion" column, select "not applicable". Justification can be included in the "Long description of issue/risk" column and summarized in the "Short description of risk" column. In this case, these two columns would be used to explain why the indicator is not applicable within the scope of the Risk Assessment.

44. While going through the Risk Assessment Template, how to specify the geopolitical scale and source types when assessing the indicators? It would be helpful if you could provide a short example of how to fill in the risk designations using the Geopolitical Scale and Source Type tabs.

The indicators are analysed according to the unique combinations of geopolitical scale and source type that you have specified. As an example, there are three geopolitical scales identified (A, B, C) and two source types identified (X and Y). Let's say that the risks for Indicator 12 might be the

same ('negligible' risk) for geopolitical scales A and B (and for both source types X and Y found there), but might be 'non-negligible' risk for source type X within geopolitical scale C. Therefore, you would need three rows to express the risk conclusion for this indicator:

- a) The first row would provide a 'negligible' risk conclusion for geopolitical scale A and B and source types X and Y,
- b) the second row would provide a 'non-negligible' risk designation for geopolitical scale C and source type X, and
- c) the third row would provide a 'negligible' risk conclusion for geopolitical scale C and source type Y.

The complexity of how many rows are needed per indicator depend on the complexity of how risk breaks down according to source types and geopolitical scales.

Use of the other documents

45. Does the <[PSU-PRO-10-002 V2-0 The Development and Approval of FSC® Centralized National Risk Assessments](#)> still apply?

No. Only <[FSC-PRO-60-006b Risk Assessment Framework](#)> applies for Centralized Risk Assessments.

46. How should the FSC Forest Stewardship Standard of a country be taken into account when developing or revising a Risk Assessment? Or does it only apply to the indicators of High Conservation Values (HCVs)?

It does not only apply to HCV indicators. As specified in Clause 15.8 of the <[FSC-PRO-60-006b Risk Assessment Framework](#)>:

'FSC-approved HCV frameworks (or parts thereof) that have previously been developed as part of the development of an FSC Forest Stewardship Standard (FSS) based on FSC Principles and Criteria version 5 (FSC P&C V5) shall be used as a primary source of information about HCV presence and threats in the Risk Assessment, provided they meet the requirements of this document.'

In addition, Clause 13.11 of the same procedure, indicates that:

'In cases where the country/region already has an approved FSS, the Risk Assessment should cross reference the relevant and up-to-date legislation identified in the FSS for the country/region under assessment.'

Finally, it is worth highlighting that when revising the Risk Assessment, it is important to check the alignment between the results of a Risk Assessment and those of an FSS. For example, for the case of presence of Indigenous Peoples, Traditional Peoples, or local communities.

For more information related to HCV framework and its submission to P&P, please also refer to Question 21.

47. Can we use FSC's developed GIS tools to assess deforestation and degradation?

Yes. The results of the GIS based solution developed by FSC will be used for the assessment of Indicator 57: 'There is no degradation of natural forests since 31 December 2020'.

48. Can we reference other Risk Assessments?

Other Risk Assessments may be consulted – please include them in the References tab of the Risk Assessment template and reference them accordingly. Differences between the Risk

Assessment currently being drafted and previous Risk Assessments in the country should be considered in the Review Report, and any important differences or changes should be noted.

49. Is it optional to use the degradation map developed by FSC within the Risk Assessments?

The risk designation provided by the GIS tool (and its degradation map) is not binding, but the following is to be considered:

- a) The risk designation of Indicator 57 (forest degradation) provided by FSC GIS tool should be considered as a starting point and initial input for the Risk Assessment to be conducted by the consultants.
- b) If the consultants have a more robust approach to assess the risk for forest degradation, they can assess the risk with their own approach.
- c) Consultants' own approach can be of two types:
 - c.1) **An approach using geospatial data:** The consultants should provide their assessment and the geospatial data using an Excel file (in this case, please contact the Country Requirements team at country_requirements@fsc.org). FSC teams will then assess the approach and the data used, in line with the review process conducted by the Country Requirements team for all other indicators as part of the regular Risk Assessment process.
 - c.2) **An approach relying on other evidence:** In this case the consultants should provide their assessment (e.g. reports, published literature, etc.) to the Country Requirements team. The Country Requirements team will assess the approach and evidence used.

Regardless of the consultant's own approach used, the consultants are strongly encouraged to contribute with additional data other than the one used with the GIS tool, to support with ground truthing the FSC GIS tool and make it more robust and relevant. Particularly, confirmed occurrence of planted forests, plantations, other wooded lands, natural forest and primary forests are relevant. These data and additional data sources can be shared in the form of shapefiles or raster to country_requirements@fsc.org.

50. Can FSS HCV framework be used, if the FSS has been conditionally approved, and none of the conditions regard HCV framework and the FSS is expected to become valid in Q2 of 2025? What about for an FSS draft awaiting approval? Would the previous version of the FSS have to be used?

For the FSS HCV framework in the conditionally approved FSS, as described in the question, the answer is 'yes'. FSC-approved HCV frameworks (or parts thereof) that have previously been developed as part of the development of an FSC Forest Stewardship Standard (FSS) based on version 5 or higher of [<FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship>](#) can be used as a primary source of information about HCV presence and threats in the Risk Assessment, provided they meet the requirements of [<FSC-PRO-60-006b Risk Assessment Framework>](#).

For the FSS HCV framework in FSS draft awaiting approval, the latest approved version based on FSC Principles & Criteria V5 or higher has to be used.

Involved parties

51. Who are the developers of FSC Risk Assessments?

Either the Network Partner (NP) or the consultants who are responsible for developing or revising the Risk Assessment. Developers of Centralized Risk Assessments are consultants jointly selected by an FSC NP and FSC's Policy and Performance Unit (P&P) (e.g., USA and Canada processes). And the developers in major processes are the Network Partners (e.g., Portugal process).

52. There is disagreement with the idea that the Risk Assessment framework is for developers only. The framework defines what risks will be considered and the scope of potential risks that the certificate holder may have to consider in their due diligence systems. Is the framework then critical for certificate holders in this sense?

The <FSC-PRO-60-006b Risk Assessment Framework> has the objective to provide requirements to ensure consistent and robust assessment of risks for sourcing material from certain supply areas. In terms of requirements, the Risk Assessment Framework is a procedure applicable to those developing the Risk Assessments. Certificate holders may read the procedure and inform themselves on the indicators and their risk thresholds inside, but only to get an idea of the potential risks that could apply to them, but the framework is not critical for them as it does not set requirements to the certificate holders.

53. Is it compulsory to consult experts? In general, but also specifically regarding High Conservation Values (HCVs)?

As per Clause 2.6 of <FSC-PRO-60-006b Risk Assessment Framework>:

'The process lead shall consult experts on the draft Risk Assessment (including but not limited to selected indicators), if:

- a) there are limited publicly available sources of information to evaluate the indicator and to reach a risk conclusion;
- b) there are doubts on how risk conclusions shall be graded (e.g., whether the risk is widespread, systematic, etc.); and
- c) input is needed to establish mitigation measures.

NOTE: The expert consultation is recommended even if the above criteria are not met.'

54. How many experts are required?

There is no minimum (see Question 36). It is up to the developer of the Risk Assessment to decide depending on each case. For example, if there are limited available sources to assess several indicators or reach a risk conclusion covering very different topics then the developer would be expected to consult different experts specialized on the specific matter under assessment. Also, if input is needed to establish mitigation measures, maybe the experts required for this topic are different than the ones providing evidence to assess the indicator.

55. Can the first draft shared with Network Partners (NP) be shared with other stakeholders, like a standard development group (SDG), for input?

Yes, the respective Network Partners can share it confidentially with SDG for inputs.

56. What if there is disagreement among stakeholders regarding risk categorization?

Consultations and balanced discussions, supported by evidence, should guide final decisions.

57. How have the consultations in centralized processes been adjusted in response to criticism of stakeholders?

There is a direct access to consultations available from the FSC website and the opportunity for stakeholders to express interest and participate in consultations has been made more accessible.

In addition, the FSC Network Partners and national representatives play an important role to ensure engagement of key stakeholders by providing information to the consultants and feedback on the proposed list of stakeholders.

More ideas are always welcome – please contact country_requirements@fsc.org .

58. How can stakeholders contribute to improving Risk Assessments?

Developers of Risk Assessments can engage with local experts, researchers, and consultants who can provide critical insights. National reports and best available information (BAI) are essential too for the development of assessments. Stakeholders can participate in public consultations and stay informed on upcoming consultations by visiting and signing up in our [FSC Country Requirements Schedule](#).

ABOUT THE CHANGES TO THE FRAMEWORK

59. Is there any reconsideration of including the additional indicators from [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#) in the Risk Assessment Framework?

No, the additional indicators are to be included in the Risk Assessment Framework, because these are:

- a) five new indicators to cover requirements in [<FSC-POL-01-007 Policy to Address Conversion>](#) and EUDR;
- b) two new indicators aligned with FSC's values related to workers' health and safety and minimizing the adverse impact on environmental values from development and maintenance of infrastructure.

The revised Risk Assessment Framework consists of 64 indicators. The previous version had 32 indicators. In this sense, 57 indicators of the new 64, cover the content of the previous 32 indicators. While there are more indicators in the revised Risk Assessment Framework, many of them derive their content from the previous Controlled Wood Risk Assessment indicators. 89% of the previous requirements have been retained to ensure stability of the system. Please read Question 62 below for more information.

60. What would be required to initiate a discussion on the reconsideration of including the additional indicators from [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#)?

The reconsideration of including these additional indicators in the Risk Assessment Framework could be discussed when initiating and undertaking a review process of [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#) according to [<FSC-PRO-01-001 The Development and Revision of FSC® Requirements>](#).

61. How can 57 indicators be part of the previous Risk Assessment Framework if the previous had 32 indicators and the new one has 64?

The revised Risk Assessment Framework consists of 64 indicators. The previous version had 32 indicators. The main reason for this increase is the simplification of indicators; by splitting the previous and making them specific to each of the requirements that need to be assessed.

In this sense, 57 indicators of the new 64, cover the content of the previous 32 indicators. While there are more indicators in the revised Risk Assessment Framework, many of them derive their content from the previous Controlled Wood Risk Assessment indicators. Please refer to Question 60 for more information.

62. If at least one indicator with a 'non-negligible' risk has a risk mitigation measure of 'not to buy', then the timber or the wood products from this geopolitical scale are not to be purchased, regardless of the assessment of other indicators. What is the general principle of using the results of the Risk Assessment in practice?

In a Centralized Risk Assessment, only recommended mitigation measures can be established (following clause 14.3 [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#)). In such case, if the developer of the Risk Assessment proposes to not buy products from the area under assessment as a mitigation measure, then either this would be the only recommended mitigation measure, or others proposed as recommended mitigation measures would also be expected to be very restrictive. If this 'not to buy' mitigation measure is recommended to one part of the whole area under assessment, then for other parts of the area under assessment that are also designated as 'non-negligible' risk, the developer would have to recommend other mitigation measures.

63. Why is the revised Risk Assessment Framework moving from legality alone to something more than legality?

The previous Risk Assessment Framework was going beyond mere legality conformance (Controlled Wood Category 1) and covering aspects such as Genetically Modified Organisms (GMOs), High Conservation Values (HCVs), worker rights, etc.

The crosswalk between the previous version of the Risk Assessment Framework and new version is available here: [Document | FSC Connect](#).

64. Could FSC provide more detailed justification for these extensive sustainability-related adjustments that leads to a shift in Controlled Wood from filtering out only the “worst of the worst” risks to now requiring non-certified materials to meet standards much closer to FM certification?

There were important aspects to consider in the revised Risk Assessment Framework. First, there was the need to align with in [<FSC-POL-01-007 Policy to Address Conversion>](#) and EUDR. Specifically, the article 2 and 4 of the [<FSC-POL-01-007 Policy to Address Conversion>](#) were critical to align to. Article 2 states that: ‘FSC requires organizations to demonstrate that they are not converting natural forests and/or High Conservation Value areas to plantations or other land uses and to demonstrate their conservation and restoration efforts through conformity with requirements in the FSC normative framework’. Article 4 of the same policy mentions ‘Conversion after 31 December 2020 is generally considered unacceptable by FSC’. For more information on the increase of indicators, please refer to Question 62.

EUDR (EU DEFORESTATION REGULATION) AND RELATED INDICATORS

65. Is there a concrete example on how companies can use Risk Assessments to comply with the EUDR?

There is not a concrete example yet, as we have not yet published any revised Risk Assessment that contains the new indicators aligned with the EUDR. We will be happy to develop some case studies in the future to share how it can be done.

66. Who can use the Simplified Risk Assessment?

The Simplified Risk Assessment can only be used by FM/COC and COCs in FSC 100% supply chains. The reason why the Simplified RA is pre-filled is because the assessment of risk is built off the FSC's International Generic Indicators (IGIs).

67. If FSC-Mix label in paper and pulp is a mix from FSC100% + FSC Recycled, can we use the Simplified Risk Assessment?

Yes, because the FSC Recycled is exempt from EUDR.

68. Why does the FSC Regulatory Module require the use of the Risk Assessment Template set by FSC, which include either 57 or 64 indicators, while the EUDR regulation only requires the use of 14 indicators?

It's a misconception that EUDR only has 14 indicators. Once you look at the definition for 'relevant legislation' you see how the list of indicators grows.

69. How do we assess 'non-negligible' vs. 'negligible' risks under the EUDR framework (Indicators 55 through 57)?

The Risk Assessment should be evidence-based, using satellite imagery, official permits, and forest management plans where applicable. For negligible risks, excessive bureaucracy without added value should be avoided.

Indicator 55: For Indicator 55, the risk is defined by default as 'non-negligible'. This is followed by mitigation measures, which are defined as recommended mitigation measure(s). When the Risk Assessment is developed by a chamber-balanced Working Group (WG), the designation as 'negligible' or 'non-negligible' depends on the available evidence. In case the WG designated a 'non-negligible' risk to indicator 55, they establish relevant mitigation measure(s) which can be either recommended or mandatory.

Indicator 57: The definition of the term 'natural forest' is based on FSC's definition, but the approach to assess this indicator is based on the EUDR requirements for 'forest degradation'. For the data, FSC GIS tool should be considered as a starting point and initial input for the Risk Assessment to be conducted by the consultants. If the consultants have a more robust approach to assess the risk for forest degradation, they can assess the risk with their own approach.

The Consultants' own approach can be either of the two types summarized below:

a) An approach using geospatial data.

In this case, the consultants should provide their assessment and the geospatial data to FSC's Policy and Performance Unit (P&P). P&P will provide a template for uploading this data.

b) An approach relying on other evidence.

In this case, the consultants should provide their assessment in the Risk Assessment Template in the rows corresponding to the indicator assessment (e.g. reports, published literature, etc.).

70. On the Simplified Risk Assessment Template, the numbers run from #1 to #57, but in fact, 9 indicator numbers are missing (#15, 23, 28, 30, 32, 37, 39, 41, 56) in between. Why is this the case?

The numbering is off because we had to keep the indicator numbering consistent. The indicators in the Simplified Risk Assessment that are missing are not related to EUDR so they are not included. The Simplified Risk Assessment is only used for EUDR alignment through the Regulatory Module.

71. Why does FSC consider transformation from plantations to agriculture use as conversion?

Indicator 55 relates to conversion from natural forest to agricultural use and to transformation of plantations to agricultural use. The <[FSC-GUI-40-005 V1-0 EN Crosswalk of indicators between Risk Assessment Framework V1-0 and V2-0](#)> explains that Indicator 55 ensures the alignment of the Risk Assessment Framework with EUDR requirements. The definition of 'forest' that applies to the [EUDR](#) is the reason why FSC considers both conversion of natural forest and transformation of plantations.

72. Can the Risk Assessment Framework be used by Promotional License Holders and others to assess risk in their EUDR and non-EUDR supply chains?

Yes, the FSC Risk Assessment Template (based on <[FSC-PRO-60-006b FSC Risk Assessment Framework](#)>) is a tool that can be used by anyone to assess a comprehensive list of risks in their supply chain.

REVIEW OF RISK ASSESSMENTS

73. How should updates to Risk Assessment be handled over time?

Annual reviews and incorporating new data are essential to refine Risk Assessments and include improvements based on evolving conditions.

74. Is there a template for the first deliverable “Reviewed draft/report”?

Yes. The template is provided by FSC’s Policy and Performance Unit (P&P) to the process lead at the beginning of the development/revision process.

75. Does the review period start from the approval or the effective date?

This will be regulated by the revised <[FSC-PRO-60-006](#)> on process requirements for Country Requirements, which is currently under development.

76. What form will the review process take (e.g., chamber-balanced Development Group, expert panel involvement, public consultation requirements, P&P role)?

The review is conducted by the responsible body (e.g., FSC Network Partner, FSC Regional Office, P&P). This will be regulated in FSC-PRO-60-006.

77. How do we handle areas where the situation is rapidly changing (e.g., temporary occupations, contamination in forest due to war situation, etc.), making data collection for review difficult?

In such cases, a tailored approach is required. Proposals include creating automated systems to regularly update data (e.g., GIS) and focusing on chronic vs. acute issues when prioritizing risks. Please contact country_requirements@fsc.org if you have specific comments on this question.

MISCELLANEOUS

78. Where a Risk Assessment doesn't yet exist, is it possible to use the existing Controlled Wood Risk Assessment as a guidance to do a full Risk Assessment?

That is one approach. Some of the information in the existing National Risk Assessments (NRA) is still valid, but anyone using an existing NRA to conform with the <[FSC-PRO-60-006b FSC Risk Assessment Framework](#)> needs to make sure the information they are transferring is accurate. The responsibility is the certificate holder's not FSC's.

79. Where can I find the latest timeline of Risk Assessments' developments?

The timelines for all the FSC Risk Assessments can be reviewed online at the [FSC Country Requirements Schedule](#).

80. What is the expected timeframe from approval/publication to the effective date of a Risk Assessment?

An approved Risk Assessment shall become effective on the date of publication as per Clause 7.2 of <[FSC-PRO-60-006b FSC Risk Assessment Framework](#)>.

81. When do we need to use the full Risk Assessment? Always when controlled wood is used instead of FSC-certified product?

Certificate holders use the full Risk Assessment Template (based on <[FSC-PRO-60-006b FSC Risk Assessment Framework](#)>) when there is no existing FSC Risk Assessment and they need to conduct an Extended Company Risk Assessment to add the [FSC Regulatory Module](#) or maintain their Controlled Wood certification after 2025.

82. How does FSC address acute issues like war in Risk Assessments?

Acute issues may require a derogation system, while chronic risks should be the focus of the Risk Assessments. This distinction ensures appropriate resource allocation.

83. Where can one find the verifiers in the Risk Assessments?

In Risk Assessments we do not have verifiers per se. Also, in FSC the verifiers are not normative. The indicators of the Risk Assessment framework are available on page 34 of the <[FSC-PRO-60-006b Risk Assessment Framework](#)>

84. What does the second part of the phrase regarding the definition of 'negligible' risk mean?

Negligible risk:

A conclusion, following a risk assessment, that either there is no cause for concern that material from a specific geographic area originates from unacceptable sources or that material is mixed with non-eligible inputs or material with a different origin in such a way that would not allow the level of risk related to origin to be confirmed as negligible.

In simple terms: A 'negligible' risk means that after assessing the risk, it's determined there is no significant concern that materials from a specific area come from unacceptable sources, or that they are mixed with other materials in a way that prevents confirming the risk level as low.

85. Regarding the topic of degradation: What does the term 'planted forest' mean? Is there a definition by FSC?

The requirements for assessing risk pertaining to forest degradation uses the approach included in the EUDR. The definition for forest degradation included in <[FSC-PRO-60-006b Risk Assessment Framework](#)> comes from the EUDR, which includes the term 'planted forest.' According to the EUDR, 'planted forest' means forest predominantly composed of trees established through planting and/or deliberate seeding, provided that the planted or seeded trees

are expected to constitute more than 50 % of the growing stock at maturity; it includes coppice from trees that were originally planted or seeded.

86. Where can I find more information or explanation about FSC's approach to degradation and the methodology in FSC's degradation data set?

The methodology of FSC's degradation model can be found in a StoryMap here:
<https://storymaps.arcgis.com/stories/9842100908714f1a9a45a2d8041f1960>.

Further inquiries can be directed towards the Monitoring & Evaluation Team – please contact Impacts@fsc.org.

87. As of today, can the procedure FSC-PRO-60-002a be used instead of the <FSC-PRO-60-006b Risk Assessment Framework>?

If the certificate holder is using FSC's Regulatory Module then the only choice is <FSC-PRO-60-006b Risk Assessment Framework>. By the end of 2025, the use of <FSC-PRO-60-006b Risk Assessment Framework> is required system-wide in accordance with Advice Note 40-005-27 in FSC-DIR-40-005 Directive on FSC Controlled Wood.



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