



Frequently Asked Questions

FAQ ON FOREST MANAGEMENT GROUPS STANDARD

Version 3



Title: FAQ on Forest Management Groups Standard

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

Phone: +49 -(0)228 -36766 -0

Fax: +49 -(0)228 -36766 -65

Email: communityfamilyforests@fsc.org

Version control

First publication date: 15 July 2022

Last updated: 21 February 2025

© 2025 Forest Stewardship Council, A.C. All Rights Reserved
FSC® F000100

You may not distribute, modify, transmit, reuse, reproduce, re-post or use the copyrighted materials from this document for public or commercial purposes, without the express written consent of the publisher. You are hereby authorized to view, download, print and distribute individual pages from this document subject for informational purposes only.

CONTENTS

FREQUENTLY ASKED QUESTIONS (FAQ)	5
PART I ESTABLISHMENT OF FOREST MANAGEMENT GROUPS	6
1.1 NEW: Clause 5.1 of <FSC-STD-30-005 V2-1 Forest Management Groups> allows the determination of the maximum manageable number of group members to be expressed in terms of area or the number of members, as stated: "The Group Entity shall determine, based on its human and technical capacities, the maximum group size that it can manage, in terms of: a) number of group members; b) individual management unit size; and/or c) total forest area and distribution. "Does the use of "and/or" in this context imply that the determination must always involve option (a) combined with at least one of options (b) or (c)? Or does it mean that either both (a) and (b), or (c) can be considered separately?"	6
1.2 Can non-SLIMF management units conform with Criterion 6.5 of <FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship> fully on behalf of SLIMF management units?	6
1.3 May conformity with Criterion 6.5 of <FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship> at SLIMF level be achieved through support for conservation actions external to the members? In the past, this was permitted where all group members were SLIMF small growers.	7
1.4 The standard specifies that each management unit shall by default conform to Criterion 6.5 of <FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship> on its own and only if not possible, 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 on its own?	7
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 V2-1 Forest Management Groups>?	7
1.6 Is it possible to have group members with different products? E.g., timber, Non-timber Forest Products (NTFP) and Ecosystem Services (ES)?	8
1.7 NEW: Can the names of Resource Management Units (RMU) be displayed in the FSC database under the "Group members/Sites" for group certification?	8
1.8 NEW: Is there an upper limit on the number of members allowed in the FM Group Certification? Does FSC set a 500-member limit for FM or CoC Group Certifications and if not, why?	8
1.9 NEW: A member of an FM group in Country A plans to incorporate management units (MUs) located across the border in Country B into the FM group certificate located in Country A.	9
PART II GROUP MANAGEMENT SYSTEM	10
2.1 There are 2 possibilities regarding false claims:	10
2.2 How is the Group Entity supposed to adapt the management system of the group certificate according to annual internal monitoring results?	10
2.3 How will the subjective monitoring at the discretion of the Group be consistently implemented amongst various CBs?	11
2.4 Does the CB audit a new member added between two audits?	11

2.5	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.	11
2.6	In the event of a corrective action request (CAR) issued by an auditor, how are disputes resolved when a group member and a contractor blame each other?	12
2.7	How would the active/inactive distinction apply when the group has multiple material products and ecosystem services?	12
PART III OPTIONAL INCLUSION OF FORESTRY CONTRACTORS		13
3.1	Could a pest control company or a transport contractor join the Group as a “contractor”?	13
3.2	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 MUs?	13
3.3	If a Contractor is a member of group A, and then harvests timber from another certified unit B, can they then sell the timber from Unit B, under what code?	13
3.4	How are non-conformities assigned if they are a result of poor performance from the contractor?	13
3.5	If a contractor can use the CoC system of the FM/CoC group certificate, how will contractors be reflected in the group certificate/ FSC database? Will they be on the list as other group members? Will they have "several certificates" if the contractor belongs to several groups?	14
3.6	May the Resource Manager be a ‘forestry contractor’ through a contractual agreement with the Group Entity?	14
3.7	How can CBs know if contractors are included in more than one FM group certificate?	14
3.8	How can a contractor meet the long-term land use and ownership rights requirements (required by Principle 1), if he only has the right to harvest the forest in a short period of time?	15
3.9	If the contractors included in the scope of the FM/CoC are already CoC certified, could we apply a lower sample size due to lower risk?	15
3.10	Do contractors need to meet the <FSC-STD-40-004 V3-1 Chain of Custody Certification> requirements when being included in the scope of FM Groups?	15
3.11	Can a concentration yard for round wood be included in the scope of the certificate?	15
3.12	NEW: A group of contractors has been operating under another Certificate Holder's FM/CoC certificate. However, due to the restriction in the CoC standard allowing only one level of subcontracting, they are facing challenges in further subcontracting. Could the contractors establish their own CoC group as a solution?	15
ABBREVIATIONS		16

FREQUENTLY ASKED QUESTIONS (FAQ)

This set of Frequently Asked Questions (FAQ) aims to clarify aspects related to the content of <FSC-STD-30-005 V2-1 Forest Management Groups>.

The questions included in this FAQ document have been compiled as a result of input from webinars, training sessions (both in-person and virtual) and email communications with stakeholders.

This FAQ is non-normative and has been developed for all interested stakeholders. This document will be updated on a regular basis.

Requests for additional topics and questions to be considered in this FAQ can be sent to communityfamilyforests@fsc.org.

PART I ESTABLISHMENT OF FOREST MANAGEMENT GROUPS

1.1 NEW: Clause 5.1 of <[FSC-STD-30-005 V2-1 Forest Management Groups](#)> allows the determination of the maximum manageable number of group members to be expressed in terms of area or the number of members, as stated: "The Group Entity shall determine, based on its human and technical capacities, the maximum group size that it can manage, in terms of: a) number of group members; b) individual management unit size; and/or c) total forest area and distribution. "Does the use of "and/or" in this context imply that the determination must always involve option (a) combined with at least one of options (b) or (c)? Or does it mean that either both (a) and (b), or (c) can be considered separately?"

The term "and/or" typically indicates flexibility or inclusivity in options. In this context, "and/or" means that the determination of the maximum group size can be based on:

- Option (a) alone;
- Option (a) combined with either option (b) or (c) or
- A combination of both options (b) and (c).

Therefore, the interpretation allows for determining the maximum manageable number of group members based on:

1. Solely the number of group members (option a), OR
2. A combination of the number of group members and the individual management unit size (option a + b), OR
3. A combination of the number of group members and the total forest area and distribution (option a + c), OR
4. A combination of the individual management unit size and the total forest area and distribution (option b + c), OR
5. Any combination of these criteria as deemed appropriate based on the capacities and circumstances of the group entity.

See Clause 5.1 of <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>.

1.2 Can non-SLIMF management units conform with Criterion 6.5 of <[FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship](#)> fully on behalf of SLIMF management units?

Yes. Non-SLIMF management units can support SLIMF management units in conforming with the Criterion 6.5 of <[FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship](#)>.

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 V2-1 Forest Management Groups](#)> and the applicable Forest Stewardship Standard are conformed with. The Group Entity may, for example, decide that some members conform with Criterion 6.5 individually and a sub-set of group members conform with Criterion 6.5 across management units. See Clause 4.2, and Box 5 of <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>.

1.3 May conformity with Criterion 6.5 of <FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship> at SLIMF level be achieved through support for conservation actions external to the members? In the past, this was permitted where all group members were SLIMF small growers.

Yes. There are specific provisions provided within the interpretation for SLIMF management units that allow conformity to be achieved outside of the management unit and the group. The interpretation provides this opportunity if there are insufficient or no representative sample areas within the management unit (MU) and if the following conditions apply:

- “The MU is smaller than 50 ha;
- The Organization shall identify rare and threatened species and their habitats in the MU. When they exist although are insufficient in size, measures for their survival and viability shall be identified and put in place.
- The outside area is in the same forest landscape.
- Sites to be conserved outside of the MU are representative samples of existing ecosystems.
- The outside area is not commercially harvested and is under a legal protection status, OR
- there is a binding contract between the Organization and the owner of the outside area to:
 - Protect the area in its natural stage;
 - Mark the boundaries of the area in the field and on maps;
 - Allow certification bodies to access the area for inspection.”

See the <INT-STD-01-001 09 (a) FSC Interpretations the Normative Framework Forest Management>.

1.4 The standard specifies that each management unit shall by default conform to Criterion 6.5 of <FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship> on its own and only if not possible, 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 on its own?

Based on Criterion 1.4, the Group Entity is responsible for conforming to the <FSC-STD-30-005 V2-1 Forest Management Groups> but can delegate responsibilities to different actors within the group according to Criterion 3.1 and 3.2.

By default, each management unit needs to conform with Criterion 6.5 at the level of the individual management unit. However, SLIMF management units that lack or have insufficient representative sample areas of native ecosystems can be exempt.

Clause 4.2 of <FSC-STD-30-005 V2-1 Forest Management Groups> allows for groups with SLIMF management units, or a mix of SLIMF and non-SLIMF management units, to support some SLIMF management units in conforming with Criterion 6.5 of <FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship>. This possibility depends on the potential existence of representative sample areas of native ecosystems that would 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 support its conformity with Criterion 6.5.

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 V2-1 Forest Management Groups>?

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 version 1-0 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 Clause 10.1 of <FSC-STD-30-005 V2-1 Forest Management Groups>.

1.6 Is it possible to have group members with different products? E.g., timber, Non-timber Forest Products (NTFP) and Ecosystem Services (ES)?

Yes. There is no restriction on products so long as the Group Entity discloses the main products in the scope of the certificate. See Clause 10.1 of <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>.

1.7 **NEW:** Can the names of Resource Management Units (RMU) be displayed in the FSC database under the “Group members/Sites” for group certification?

The FSC database does not include a field for RMU names for external audits conducted by certification bodies (CBs). Evaluation requirements for CBs, including the division of responsibilities within Forest Management Group such as a resource manager, are included in V4-0, Annex 4 of the <[FSC-STD-20-007 V4-0 Forest Management Evaluations](#)>. However, neither the FSC standards <[FSC-STD-20-007 V4-0 Forest Management Evaluations](#)>, <[FSC-STD-20-007a Forest Management Evaluations Addendum](#)> and <[FSC-STD-30-005 V2-1 Forest Management Groups](#)> nor the FSC Digital Audit Report (DAR) include requirements for listing RMU names.

The current standard <[FSC-STD-20-007 V4-0 Forest Management Evaluations](#)> CB are required to only apply RMU concept as a basis for sampling if the group manager has implemented the concept in their FM group according to <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>. CBs are required to provide MU-level details in the evaluation report and should not provide aggregated data on multiple MUs. Therefore, the RMU concept in relation to reporting does not necessitate its own field for reporting.

Clause 8.3.4. of <[FSC-STD-20-007 V4-0 Forest Management Evaluations](#)> states:

“For the purposes of sampling, MUs qualifying as SLIMF or community forest within an RMU (Resource Management Unit) may be considered equal to one MU. MUs managed by a Resource Manager that do not qualify as SLIMF or community forest shall be sampled in accordance with Tables 4 and 5 (above).
NOTE: The RMU concept is defined in FSC-STD-30-005 Forest Management Groups and can only be applied if the Group Entity and Resource Manager conform with the applicable requirements.”

The FSC database draws its input from the Salesforce interface used by CBs, which does not have a field for RMU names. However, RMU names may be included in the FM evaluation report summaries, which could be a good alternative for making this information available to external parties.

1.8 **NEW:** Is there an upper limit on the number of members allowed in the FM Group Certification? Does FSC set a 500-member limit for FM or CoC Group Certifications and if not, why?

There is no fixed upper limit for group members in <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>. Clause 5.1 of the standard allows the Group Entity to set its own maximum group size based on its human and technical capacities, considering factors such as the number of members, individual management unit sizes, and total forest area.

<[FSC-STD-30-005 V2-1 Forest Management Groups](#)> was designed to accommodate smallholders (known in the FSC system as small-scale producers), particularly in regions where forest owners may manage very small plots of land (e.g., less than 5 hectares). Imposing a rigid member limit would restrict access to certification for small-scale producers seeking a cost-effective pathway to certification. Therefore, the standard provides group entities the flexibility to determine and manage group size responsibly based on their capacities.

The 500-member limit applies only to Chain of Custody (CoC) Group Certification, as outlined in Clause 5.5.1 of <FSC-STD-40-003 V2-1 Chain of Custody Certification of Multiple Sites>.

1.9 NEW: A member of an FM group in Country A plans to incorporate management units (MUs) located across the border in Country B into the FM group certificate located in Country A.

- a. **What is the process for incorporating this MU into the FM group certificate of Country A?**
- b. **Is certification against the National Forest Stewardship Standard of Country B required for this management unit?**
- c. **Are there any additional requirements for the group manager in this scenario?**
- d. **Is it possible also to establish a cross-border Controlled Wood / Forest Management (CW/FM) or Controlled Forest Management (CFM) certification group, and what are the requirements?**

- a. To incorporate an MU from Country B into the FM group certificate of Country A, the Group Entity must evaluate the feasibility of effectively implementing a multinational group management system. According to Clause 6.2 of <FSC-STD-30-005 V2-1 Forest Management Groups>, if conditions support effective management across borders, the Group Entity can seek formal approval from FSC International through their certification body for multinational group certification.
- b. Clause 1.5 of <FSC-STD-30-005 V2-1 Forest Management Groups> specifies that the Group Entity must ensure that the group members demonstrate sufficient knowledge to conform with the applicable Forest Stewardship Standard. The MU in Country B must comply with the applicable Forest Stewardship Standard of Country B, and the MU in Country A must conform with the applicable Forest Stewardship Standard of Country A.
- c. No additional requirements are officially mandated for a group manager overseeing a multinational FM group, as per <FSC-STD-30-005 V2-1 Forest Management Groups>.
- d. The conditions as mentioned under points a-c above are similar for Controlled Wood / Forest Management (CW/FM) or Controlled Forest Management (CFM) groups. When applying for CW/FM groups <FSC-STD-30-010 V2-0 Controlled Wood Standard for Forest Management Enterprises> or CFM groups <FSC-STD-30-010 V3-0 Controlled Forest Management>, the standard must be adapted to reflect the applicable Forest Stewardship Standard approved in each country, leading to potential differences in the requirements. Cross-border groups must consider these variations in their implementation plan and compliance assessment.

PART II GROUP MANAGEMENT SYSTEM

2.1 There are 2 possibilities regarding false claims:

- Total harvesting volumes exceed maximum/actual harvestable volumes.
- Total sales volumes exceed harvesting volumes.
How does FSC control these false claims?

According to the current FSC definition, False Claim means “FSC claim made on sales documents (physical or electronic) or the use of the FSC trademarks, on products and/or for projects that are not eligible to be claimed, labelled and/or promoted as being FSC-certified or FSC Controlled Wood. A False Claim is different from an inaccurate claim, in which a product, that is eligible to be sold as FSC certified, is sold with the wrong claim”. See: <ADVICE-40-004-18 V2-0 Addressing false FSC claims on products/projects containing material from unacceptable sources>.

In the context of the <FSC-STD-30-005 V2-1 Forest Management Groups>, the Group Entity is required to administer 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 the actual annual FSC sales volume of the group, see Clause 10.1 of <FSC-STD-30-005 V2-1 Forest Management Groups>.

Additionally, in countries where FSC International has explicitly determined a high risk of false claims, (involving forest products harvested from FM/CoC group certificates) 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, see Clause 10.3 of <FSC-STD-30-005 V2-1 Forest Management Groups>.

When mismatches and potential false claims are identified, they will be processed according to <ADVICE-40-004-18 V2-0 Addressing false FSC claims on products/projects containing material from unacceptable sources>. The Advice Note primarily applies to certified organizations who have generated such false claims and specifies the actions for them, their CBs, as well as for ASI and FSC to address these false claims. It further applies to organisations adding new group members/sites and certificate holders/organizations outsourcing services to prevent them from developing business relations with organizations who generated false claims and have been blocked from the FSC system.

2.2 How is the Group Entity supposed to adapt the management system of the group certificate according to annual internal monitoring results?

The Group Entity is expected to evaluate if the management system is adequate to ensure continued conformity across the group certificate with applicable FSC requirements.

The internal monitoring of the group includes annual field visits to a sample of management units of the group. The minimum number of management units to be visited annually is calculated by using the table in Clause 11.4 of <FSC-STD-30-005 V2-1 Forest Management Groups>.

The Group Entity can justify applying a lower monitoring intensity as per Clause 11.4. Based on its regular, at least yearly, analysis of the results of the internal monitoring, the Group Entity can improve the group management system and adapt the internal monitoring intensity to fit their circumstances. However, the Group Entity must 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 conformity with the applicable Forest Stewardship Standard and that non-conformities will be identified.

Based on the analysis of the internal monitoring results, the Group Entity may need to sample more than the baseline or minimum sample established in Clause 11.4 when high risks are identified. Examples of

high risks include unresolved substantiated land tenure or use rights disputes, threatened High Conservation Values (HCVs), or substantiated stakeholder complaints, as explained in Clause 11.8 of <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>.

See Clauses 11.1, c; 11.4; 11.7; 11.8 and box 6 of <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>.

2.3 How will the subjective monitoring at the discretion of the Group be consistently implemented amongst various CBs?

The requirements for certification bodies (CBs) to evaluate certificate holders, including internal monitoring methodologies used by Group Entities, are outlined in <[FSC-STD-20-007 V4-0 Forest Management Evaluations](#)>, not in <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>. Specifically, Chapters 8.3, 8.4, and 8.5 of <[FSC-STD-20-007 V4-0](#)> establish the sampling requirements for group certification and the inclusion of forestry contractors in the scope of group certification.

Under <[FSC-STD-30-005 V2-1](#)>, the Group Entity is allowed to apply discretionary sampling of management units within Resource Management Units (RMUs) in its annual internal monitoring. However, 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.” (See Clause 11.4, and Box 6 of <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>).

2.4 Does the CB audit a new member added between two audits?

Yes. The certification body requirements for evaluating group certificates and individual members are laid out in the <[FSC-STD-20-007 V4-0 Forest Management Evaluations](#)>. The Clause 8.1.5. says: “If new MUs have been added to the scope of certification since the last evaluation, they shall be sampled at the rate of a main evaluation.”

The Clause 8.1.6. says: “If the MUs that have been added to the scope of an existing group or multiple MU certification have been FSC certified within the last six months, they may be sampled at the rate of an annual surveillance.”

The Group Entity is required to evaluate applicant members and ensure no major non-conformities exist in the management units of the applicant. See Clause 7.1 of <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>.

2.5 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 are not included in 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. Sub-certificate codes could potentially be used as internal reference information on the invoices if the Group Entity wishes to do so. Sub-certificate codes may be issued and used by the Group Entity for internal purposes. All invoices issued by the Group Entity or any group member (and forestry contractor included in the scope of the certificate) need to carry the certificate code of the group certificate. See Clause 10.1, and Terms & Definitions of <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>.

2.6 In the event of a corrective action request (CAR) issued by an auditor, how are disputes resolved when a group member and a contractor blame each other?

According to Clause 1.2.3 h of the <FSC-STD-20-001 V4-0 General Requirements for FSC Accredited Certification Bodies>, any complaints are first handled according to the certification body's dispute resolution procedure. If the dispute is not resolved through the certification body's procedure, it is then referred to ASI. In cases of disagreement with audit findings related to FSC normative documents, the issue can ultimately be referred to FSC.

As per the <FSC-STD-20-007 V4-0 Forest Management Evaluations>. Clauses 16.1-16.3 and the <INT-STD-20-007 59 FSC Interpretations the Normative Framework Forest Management>, certification bodies shall define the methodology by which the certification body determines a 'failure' of a forest management group and distinguish whether a failure constitutes a 'group failure', a 'member failure' or 'forestry contractor failure'.

If the non-conformity is related to a forestry contractor's performance and the group entity has fulfilled all related responsibilities (administration, management planning, training, monitoring, quality control etc.) as specified in <FSC-STD-30-005 V2-0 Forest Management Groups>, it is considered a 'member failure'. If the group entity has failed to conform with <FSC-STD-30-005 V2-0 Forest Management Groups>, it constitutes a 'group failure'. See <INT-STD-20-007 59 FSC Interpretations the Normative Framework Forest Management>.

Clause 16.3 of <FSC-STD-20-007 V4-0 Forest Management Evaluations> specifies that depending on the number and seriousness of the 'member failure' or 'forestry contractor failure', the resolution shall lead to corrective actions, suspensions or expulsion of a group member or forestry contractor, respectively.

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

The Group Entity shall specify what constitutes an active management unit for the group. By definition, the active management unit is as follows:

"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."

Applying the Ecosystem Services Procedure does not automatically affect how the Group Entity can specify how the management units are divided between 'active' and 'inactive' ones. Only when there are site-disturbing activities, does the Group Entity need to specify that a management unit is 'active'.

NOTE: The Group Entity may decide not to specify which management units have been 'active' and which 'inactive' since the previous evaluation. By default, all management units would then be treated as 'active' management units. See Clause 11.3, and Terms & Definitions of <FSC-STD-30-005 V2-1 Forest Management Groups>.

PART III OPTIONAL INCLUSION OF FORESTRY CONTRACTORS

3.1 Could a pest control company or a transport contractor join the Group as a “contractor”?

Yes. The term ‘forestry contractor’ in the context of the <FSC-STD-30-005 V2-1 Forest Management Groups> 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).”

3.2 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 MUs?

No. The Group Entity needs to develop provisions for the use of trademarks by members and forestry contractors included in the scope of the FM/CoC certificate in the Group Rules. The Group Entity is responsible for ensuring that all use of FSC trademarks is conforming with trademark use requirements. See Clause 9.1, (i) of <FSC-STD-30-005 V2-1 Forest Management Groups>.

3.3 If a Contractor is a member of group A, and then harvests timber from another certified unit B, can they then sell the timber from Unit B, under what code?

Forestry contractors can join multiple FM/CoC group certificates. The contractor’s operations within the scope of group A are limited to the management units of the group. 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. See Clause 13.1 of <FSC-STD-30-005 V2-1 Forest Management Groups>.

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

For internal non-conformities, the Group Entity shall analyse the cause and responsible entity for the non-conformity and issue internal corrective action requests. 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 shall be issued, and its implementation followed up by the Group Entity. See Clause 18.2 of <FSC-STD-30-005 V2-1 Forest Management Groups>.

3.5 If a contractor can use the CoC system of the FM/CoC group certificate, how will contractors be reflected in the group certificate/ FSC database? Will they be on the list as other group members? Will they have "several certificates" if the contractor belongs to several groups?

The FSC database is updated based on certification reports submitted by certification bodies. Previously, certification bodies were not required to include information about forestry contractors in these reports (as per <[FSC-STD-20-007 V4-0 Forest Management Evaluations](#)> and <[FSC-STD-20-007a Forest Management Evaluations Addendum](#)>). However, an interpretation <[INT-STD-20-007b 06 FSC Interpretations the Normative Framework Forest Management](#)> required certification bodies to include similar information about forestry contractors within the scope of the FM/CoC certificate as for non-SLIMF members of FM group certificates. These normative documents are now in transition until the end of 2025.

As of 1 July 2023, based on Annex 4, table 8, reporting requirement #45 <[FSC-STD-20-007 V4-0 Forest Management Evaluations](#)>, certification bodies are now required to provide detailed information about each member and contractor, including their responsibilities, name, contact details, certified area, whether they are a contractor, and their dates of entry and exit from the group. The elements of reporting requirement #45 are not required to be registered in the public summary for members whose all MUs are classified as SLIMF or community forests.

Forestry contractors may join an FSC FM/CoC or a CFM group and may be part of multiple groups. They will be listed in the FSC database similarly to other group members, with specific details indicating their role as contractors. Contractors can operate under the FSC group certificate(s) within the management units of the groups they have joined. If contractors need to operate in management units outside these groups, they must obtain a separate CoC certificate. See Clause 13.1 of <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>.

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

Yes. The definition of 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 E. Terms and Definitions and also part III box 8 under Clause 19 of <[FSC-STD-30-005 V2-1 Forest Management Groups](#)>.

3.7 How can CBs know if contractors are included in more than one FM group certificate?

As per <[INT-STD-20-007b 06 FSC Interpretations the Normative Framework Forest Management](#)> and Annex 4, table 8 of <[FSC-STD-20-007 V4-0 Forest Management Evaluations](#)>, certification bodies are required to include the same information about forestry contractors included in 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.

3.8 How can a contractor meet the long-term land use and ownership rights requirements (required by Principle 1), if he only has the right to harvest the forest in a short period of time?

Forestry contractors may be included in the scope of the FM/CoC group certificates as service providers. <FSC-STD-01-001 V5-3 FSC Principles and Criteria for Forest Stewardship> apply to the certified management units, the contractors deliver forest management and silvicultural services to ensure conformity with these requirements. The Group Entity may delegate responsibilities to the forestry contractors to conform with the applicable Forest Stewardship Standard. See Clause 13.2 of <FSC-STD-30-005 V2-1 Forest Management Groups>.

3.9 If the contractors included in the scope of the FM/CoC are already CoC certified, 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 certification in any way.

NOTE: The contractors may hold a separate CoC certificate whilst at the same time being included in the scope of FM/CoC certificates based on Clause 13.1 of <FSC-STD-30-005 V2-1 Forest Management Groups>.

3.10 Do contractors need to meet the <FSC-STD-40-004 V3-1 Chain of Custody Certification> requirements when being included in the scope of FM Groups?

No. Forestry contractors included in the scope of an FM/CoC group certificate need to follow the Group rules and conform to all applicable responsibilities allocated to them by the Group Entity. <FSC-STD-40-004 V3-1 Chain of Custody Certification> does not apply to FM/CoC certification. See Clause 13.3 of <FSC-STD-30-005 V2-1 Forest Management Groups>.

3.11 Can a concentration yard for round wood be included in the scope of the certificate?

Yes. If the ownership of the round wood is still with an entity included in the scope of the certificate, it can be covered in the scope of FM/CoC group certification. See Section E, Definition for 'Forest gate' of <FSC-STD-30-005 V2-1 Forest Management Groups>.

3.12 NEW: A group of contractors has been operating under another Certificate Holder's FM/CoC certificate. However, due to the restriction in the CoC standard allowing only one level of subcontracting, they are facing challenges in further subcontracting. Could the contractors establish their own CoC group as a solution?

While <FSC-STD-30-005 V2-1 Forest Management Groups> does not specify requirements for subcontracting, Clause 13.1 permits forestry contractors to join an FSC FM/CoC or a CFM group or obtain a separate CoC certificate to operate outside the group, ensuring conformity with FSC requirements.

Forestry contractors in this case are eligible to join an FM/CoC group only. This means contractors can operate solely within the management units (MUs) of the groups they have joined, as they are not allowed to participate in or operate within CFM groups. Additionally, Note 2 of Clause 13.1 of <FSC-STD-30-005 V2-1 Forest Management Groups> clarifies that they can obtain a separate CoC certificate, enabling them to operate in MUs outside the group they have joined.

ABBREVIATIONS

CIP	Continuous Improvement Procedure
CF	Community Forests
FM	Forest Management
FSS	Forest Stewardship Standard
GE	Group Entity
MU	Management Unit
PSU	Performance and Standards Unit
SLIMF	Small or Low Intensity Managed Forest



FSC International – Policy and Performance Unit

Adenauerallee 134

53113 Bonn

Germany

Phone: +49 -(0)228 -36766 -0

Fax: +49 -(0)228 -36766 -65

Email: psu@fsc.org