



Standard Addendum

FSC REGULATORY MODULE – FOREST MANAGEMENT EVALUATIONS

FSC-STD-20-007r V1-0



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INTRODUCTION

The Forest Stewardship Council (FSC) has developed the FSC Regulatory Module to assist FSC certificate holders in aligning their practices with the requirements of Regulation (EU) 2023/1115 (EUDR). The FSC Regulatory Module empowers users to navigate the regulatory landscape effectively, supporting both legal compliance and sustainability best practices. The FSC Regulatory Module sets the framework and requirements to:

- introduce a due diligence system to support EUDR compliance, including information collection, risk assessment and risk mitigation,
- gather and transmit precise information on the origin of products, including geolocation and time of production, and
- ensure that only deforestation-free material enters the FSC chain of custody.

Voluntary add-on module

The FSC Regulatory Module is a set of complementary requirements to add on to existing FSC certification requirements for forest management, chain of custody, project certification and controlled wood.

Independent evaluation

As FSC accredited certification bodies evaluate conformity with the module, organizations opting to be certified against the FSC Regulatory Module are provided with an additional layer of assurance. Additional requirements for FSC-accredited certification bodies to conduct Forest management evaluations in this standard addendum include additions to reporting requirements and certification decision. While certification bodies evaluate conformity with the module's requirements, the ultimate decision on EUDR compliance rests with relevant competent authorities.

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A. SCOPE

This standard addendum is for voluntary use by certification bodies to evaluate conformity of organizations applying for or holding FSC Forest Management or Controlled Forest Management certification to extend their certification scope in order to align with the Regulation (EU) 2023/1115 (also referred to in this standard as ‘the Regulation’, ‘this Regulation’ or “EUDR”).

Certification bodies may choose whether to offer verifying The Organizations’ conformity to the FSC Regulatory Module. However, if a certification body chooses to provide this evaluation, conformity with the requirements in <FSC-STD-20-001 General requirements for FSC accredited certification bodies>, <FSC-STD-20-007 Forest Management Evaluations>, <FSC-STD-20-001r Regulatory Module - General Requirements for Certification Bodies> and this standard addendum is mandatory.

All aspects of this standard addendum are considered normative, including the scope, effective and validity dates, references, terms and definitions, footnotes, graphics, and tables unless otherwise stated. Notes, information boxes, and examples are not considered normative.

B. REFERENCES

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

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

FSC-STD-20-001 V4-0	General Requirements for FSC Accredited Certification Bodies
FSC-STD-20-007 V4-0	Forest Management Evaluations
FSC-STD-20-001r	Regulatory Module - General Requirements for Certification Bodies

C. TERMS AND DEFINITIONS

For the purposes of this document, the terms and definitions included in <[FSC-STD-01-002 FSC Glossary of Terms](#)>, and the following apply:

Authorized representative: ‘authorized representative’ as defined in the Regulation (EU) 2023/1115, Article 2 (22), is equivalent to any natural or legal person established in the EU who has received a written mandate from an operator or a regulatory trader to act on its behalf in relation to specified tasks with regard to the operator’s or the regulatory trader’s obligations under this standard.

Due diligence statement: A document confirming the implementation of a due diligence system by the operator, which encompasses information collection, risk assessment and risk mitigation measures in accordance with Regulation (EU) 2023/1115 of the European Parliament and of The Council of 31 May 2023. The statement affirms that the operator has conducted due diligence to ascertain that either no risk or only a negligible risk has been identified concerning the compliance of the relevant products in adherence to Article 3, point (a) or (b), and Article 4(2) and 8; of the Regulation (EU) 2023/1115 of the European Parliament and of The Council of 31 May 2023.

Forest: A tract of land dominated by trees (Source: <[FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship Standard](#)>).

Fully verified supply chain: Supply chain where every certificate holder has applied the [FSC Regulatory Module](#) and establishes a product group for the purpose of controlling the Regulatory+ output claim.

Geolocation: ‘geolocation’ as defined in the Regulation (EU) 2023/1115, Article 2 (28) is equivalent to the geographical location of a plot of land described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least six decimal digits.

Micro, small and medium-sized enterprises/SMEs: ‘micro, small and medium-sized enterprises’ or ‘SMEs’ means micro, small and medium-sized undertakings as defined in Article 3 of Directive 2013/34/EU of the European Parliament and of the Council.

SME categories according to [Directive 2013/34/EU of the European Parliament and of the Council](#):

“1. In applying one or more of the options in Article 36, Member States shall define micro-undertakings as undertakings which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:

- a) balance sheet total: EUR 350 000;
- b) net turnover: EUR 700 000;
- c) average number of employees during the financial year: 10.

2. Small undertakings shall be undertakings which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:

- a) balance sheet total: EUR 4 000 000;
- b) net turnover: EUR 8 000 000;
- c) average number of employees during the financial year: 50.

Member States may define thresholds exceeding the thresholds in points (a) and (b) of the first subparagraph. However, the thresholds shall not exceed EUR 6 000 000 for the balance sheet total and EUR 12 000 000 for the net turnover.

3. Medium-sized undertakings shall be undertakings which are not micro-undertakings or small undertakings and which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:

- a) balance sheet total: EUR 20 000 000
- b) net turnover: EUR 40 000 000
- c) average number of employees during the financial year: 250.“

Mitigation measure: The term ‘mitigation measure’ as mentioned in the Regulation (EU) 2023/1115, Article 11(1) is equivalent to an action that the organization shall take to mitigate the risk of sourcing material from unacceptable sources.

Non-negligible risk: A conclusion, following a risk assessment, that there is cause for concern that material from unacceptable sources may have been sourced or entered the supply chain from a specific geographic area. The nature and extent of this risk is specified for the purpose of defining efficient mitigation measures.

Operator: ‘operator’ as defined in the Regulation (EU) 2023/1115, Article 2(15) is equivalent to (The) Organization who places relevant products on the EU market or exports them.

Plot of land: ‘plot of land’ as defined in the Regulation (EU) 2023/1115, Article 2(27) means land within a single real-estate property, as recognized by the law of the country of production, which enjoys sufficiently homogeneous conditions to allow an evaluation of the aggregate level of risk of deforestation and forest degradation associated with relevant commodities produced on that land.

Regulatory Claim: A claim made on sales and delivery documents based on inputs that meet the requirements of FSC Regulatory Module. It can only be used in combination with the FSC claims (except FSC Recycled), e.g., FSC 100% / Regulatory.

Regulatory+ Claim: A claim made on sales and delivery documents based on inputs exclusively with an FSC 100% or FSC CFM/ Regulatory+ claim and where every upstream certificate holder within a fully verified supply chain has applied the FSC Regulatory Module. It can only be used in combination with the FSC 100% or FSC CFM claim.

Regulatory trader: ‘trader’ as defined in the Regulation (EU) 2023/1115, Article 2(17) means any person in the supply chain other than the operator who, in the course of a commercial activity, makes relevant products available on the EU market. However, in order to avoid confusion with the term ‘trader’ as defined in <FSC-STD-40-004 Chain of Custody Certification>, FSC uses the term ‘regulatory trader’ in this standard when referring to a trader in the meaning of the EUDR.

Substantiated concern: ‘substantiated concern’ as defined in the Regulation (EU) 2023/1115, Article 2(31) means a duly reasoned claim based on objective and verifiable information regarding non-compliance with this Regulation and which could require the intervention of competent authorities.

Supply area: The geographical area from which material is sourced. The supply area does not need to be defined as a single contiguous area; it may comprise multiple separate areas that span multiple political jurisdictions including countries or multiple forest types.

Verbal forms for the expression of provisions:

[Adapted from *ISO/IEC Directives Part 2: Rules for the structure and drafting of International Standards*]

- “shall”: indicates requirements strictly to be followed in order to conform with the standard.
- “should”: indicates that among several possibilities one is recommended as particularly suitable, without mentioning or excluding others, or that a certain course of action is preferred but not necessarily required. A ‘should requirement’ can be met in an equivalent way provided this can be demonstrated and justified.
- “may”: indicates a course of action permissible within the limits of the document.
- “can”: is used for statements of possibility and capability, whether material, physical or causal.

D. ABBREVIATIONS

DDS	Due Diligence System
EU	European Union
EUDR	Regulation (European Union) 2023/1115 on Deforestation-free Products
EUR	Euro
FPIC	Free, Prior and Informed Consent
FSC	Forest Stewardship Council
ISO	International Organization for Standardization
ME	Main Evaluation
MU	Management Unit
SE	Surveillance Evaluation
RE	Re-evaluation
REG+	Regulatory+ Claim
SME	Micro, Small and Medium-sized Enterprises
UN	United Nations

ADDITIONAL ACCREDITATION REQUIREMENTS FOR FSC-STD-20-007 FOREST MANAGEMENT EVALUATIONS

1 REPORTING REQUIREMENTS

- 1.1 Additional to the minimum mandatory content of the evaluation report and public summary in Annex 4 of <FSC-STD-20-007 Forest Management Evaluations>, the certification body shall register in the reports [Annex 4 FSC-STD-20-007/EUDR 12]:

FSC REGULATORY MODULE

Table 1 Minimum mandatory content of the evaluation report and public summary for FSC Regulatory Module

Information elements	Evaluation Type			SMEs	Non-SMEs	Public summary
	ME	SE	RE			
77. A summary of the due diligence system, including at least: a) a summary of: i. relevant products; ii. the quantity of the relevant products; iii. the country of production; iv. the geolocation of plots of land where the product was produced, v. the date or time range of harvesting; vi. businesses, operators, or traders to whom the relevant products have been supplied; b) a description of the information and evidence obtained and used to assess the risk, the conclusions of the risk assessment and the measures implemented, and c) a description of the process of consultation of Indigenous Peoples, local communities and other customary tenure rights holders or of the civil society organizations that are present in the area of production of the relevant products.	x	x	x		x	x
78. Date of the evaluation of conformity with the FSC Regulatory Module.	x	x	x	x	x	x
79. Audit findings related to the FSC Regulatory Module.	x	x	x	x	x	x
80. A description of any conditions and subsequent actions taken by The Organization prior to the decision to correct major or minor non-conformities with the FSC Regulatory Module that had been identified.	x	x	x	x	x	x



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