



Interpretation

# INTERPRETATIONS OF THE NORMATIVE FRAMEWORK

GENERAL



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<b>Contact for comments:</b>	FSC International – Policy and Performance Unit Adenauerallee 134 53113 Bonn Germany
	<b>Phone:</b> +49 -(0)228 -36766 -0 <b>Fax:</b> +49 -(0)228 -36766 -65 <b>Email :</b> systemdevelopment@fsc.org

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This is an official approved English version. In case of doubt or if there is any difference between the translated version and the approved English version, the English version shall prevail.

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# POLICIES

## FSC-POL-01-004 (V2-0) Policy for the Association of Organizations with FSC

<b>Code</b>	INT-POL-01-004_01
<b>Requirement (s)</b>	Clause 1.e
<b>Publication date</b>	11 July 2011

### Does research on GMOs by FSC certificate holders or affiliated organizations constitute a breach of the FSC Policy on Association?

The FSC Policy on Association had its origins in the FSC Partial Certification Policy and is intended to prevent green washing by companies that are not committed to FSC certification. The Policy states that FSC shall not be associated with organizations that are directly or indirectly involved in the introduction of genetically modified organisms in forestry operations. Research, as defined in this document, does not constitute a breach to the FSC Policy on Association since the concept of operations is related to the standard commercial activities of an organization and as such does not include research efforts.

For the purpose of this clarification, research is understood as activities that:

- have a clear investigative purpose (i.e. test a hypothesis),
- are carried out on a limited scale and with defined timelines that are compatible to the scope of the research,
- are conducted following all related legal requirements, including safeguards and permits.

Decision making process: The above interpretation was approved by the FSC Board of Directors at the 57th meeting.

## FSC-POL-01-004 (V3-0) Policy for the Association of Organizations with FSC

<b>Code</b>	INT-POL-01-004_02
<b>Requirement (s)</b>	Clause 1c) of FSC-POL-01-004 V3-0
<b>Publication date</b>	27 September 2024

### Is the 'right of access' to the workplace considered integral to the worker's right to freedom of association within the FSC Policy for Association?

Yes, right of access to the workplace by workers' representatives and trade union representatives is essential to exercise the right to freedom of association, as defined in the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at work, within the forestry and forest products sector.

This interpretation is in alignment with the ILO Committee on Freedom of Association (CFA), which provides that access is to be granted to worker representatives and trade union representatives when it is necessary for the proper fulfilment of their representative function and for communication with workers on the potential advantages of unionization. The exercise of this right is provided with due respect to the rights of property and management and should not impair or be at the detriment to the efficient functioning of the organization.

NOTE: More detailed requirements on the right of access to the workplace will be provided in the upcoming revisions of the relevant standards.

<b>Code</b>	INT-POL-01-004_03
<b>Requirement (s)</b>	Clause 1c) of FSC-POL-01-004 V3-0; definition of “Workers’ rights” in Annex 3 of FSC-POL-01-004 V3-0
<b>Publication date</b>	21 January 2026
<b>By signing the self-declaration regarding the FSC-POL-01-004 V3-0, how does clause 1.c) of FSC-POL-01-004 V3-0 apply in countries where relevant ILO fundamental conventions have not yet been ratified?</b>	
By signing the self-declaration regarding the FSC values (Policy for Association), the signatory explicitly declares it has read, understood, and will adhere to the FSC Policy for Association (FSC-POL-01-004 V3-0), including clause 1.c). For associated individuals, organizations and their corporate groups, they agree to not violate “ <i>workers’ rights and principles as defined in the ILO Declaration on Fundamental Principle and Rights at Work within the forestry or forest products sector.</i> ”	
In countries where relevant ILO fundamental conventions have not yet been ratified, clause 1.c) still applies with due consideration to the rights and obligations established by national law, while at the same time fulfilling the principles of the relevant ILO fundamental conventions.	

# STANDARDS

## FSC-STD-01-002 (V1-0) FSC Glossary of Terms

<b>Code</b>	INT-STD-01-002_06
<b>Requirement (s)</b>	Section 2
<b>Publication date</b>	09 June 2015
<p><b>A certificate holder applies a chemical, recently listed by FSC as 'highly' hazardous pesticide, to lakes and rarely to streams to control invasive species.</b></p> <p><b>a) Are water bodies included in the scope of an FM certificate?</b></p> <p><b>b) Does the scale of the water body influence this?</b></p> <p>a) Water bodies contribute to the management objectives and therefore, applying the definition of Management Unit (MU), water bodies within or adjacent to the spatial area(s) submitted for certification under legal title or management control of, or operated by or on behalf of The Organization are in the scope of the certificate.</p> <p>b) The definition of water body in the International Generic Indicators (FSC-STD-60-004 V1-0 EN) does not make distinctions based on the scale. See definition below.</p> <p><u>Water bodies (including water courses):</u> Seasonal, temporary, and permanent brooks, creeks, streams, rivers, ponds, and lakes. Water bodies include riparian or wetland systems, lakes, swamps, bogs and springs.</p>	

<b>Code</b>	INT-STD-01-002_05
<b>Requirement (s)</b>	Section 2
<b>Publication date</b>	09 June 2015
<p><b>Shall nurseries that do not physically fall within the geographical boundaries of the Management Unit (MU), but are owned and operated by the certificate holder be evaluated against the P&amp;C and thus be subject to evaluation?</b></p> <p>No, PSU has received the mandate from the Policy and Standards Committee to develop a new advice note on nurseries. The advice note will define criteria for the material entering in the MU regardless of the situation of the nursery. Until the new advice note has been developed, only nurseries <u>within or adjacent</u> to the MU are subject to evaluation.</p>	

<b>Code</b>	INT-STD-01-002_04
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<b>Requirement (s)</b>	Section 2
<b>Publication date</b>	19 January 2015
<p><b>What type of infrastructure shall to be evaluated against the P&amp;C and thus be subject to evaluation?</b></p> <p>All infrastructure within the Management Unit. This includes:</p> <ul style="list-style-type: none"> <li>• All infrastructure within or adjacent to this spatial area or areas under legal title or management control of, or operated by or on behalf of The Organization, for the purpose of contributing to the management objectives.</li> <li>• All infrastructure outside, and not adjacent to this spatial area or areas and operated by or on behalf of The Organization, solely for the purpose of contributing to the management objectives.</li> </ul> <p>NOTE. Infrastructure: In the context of forest management, roads, bridges, culverts, log landings, quarries, impoundments, buildings and other structures required in the course of implementing the management plan (Source: FSC 2014).</p>	

<b>Code</b>	INT-STD-01-002_03
<b>Requirement (s)</b>	Section 2
<b>Publication date</b>	19 January 2015
<p><b>Can a Management Unit (MU) be only a part of a forest covered by a management plan? For example: can five lands be five management units, if for these five lands there is only one management plan?</b></p> <p>No, the definition of MU is directly linked to the management plan. If there are management planning documents at different levels, MU can be defined as the area at which the calculation is made of the yield which can be permanently sustained (as per criterion 5.6 and usually referred to as AAC (Annual Allowable Cut)).</p>	

<b>Code</b>	INT-STD-01-002_02
<b>Requirement (s)</b>	Section 2
<b>Publication date</b>	06 June 2014

**A multinational manages both own and third party estates (consortium and leases with private owners and public administrations). The management and its responsibility correspond to the multinational and there are ongoing contracts. This context has not changed in the last 15 years but this client has switched from group to individual certification and vice versa, following the criteria of different CBs. According to FSC Normative, should it be treated as a single or a group certificate?**

Management means having full control of all aspects of the Principles & Criteria. If this multinational company has full managerial control over all areas they manage, it should be treated as a multiple MU and therefore single certification. If the company has partial managerial control (only over some areas or aspects), it should be treated as a group certificate.

<b>Code</b>	INT-STD-01-002_01
<b>Requirement (s)</b>	Section 2
<b>Publication date</b>	10 April 2012

**“Self-contained” and “collection of documents” appear contradictory so the use of documents as basis for definition of MU could result in inconsistent interpretation of what an “MU” is in the case where an organisation has a number of management planning documents at different levels, assuming the collection of documents together meet Principle 7 requirements for management plans.**

Management Unit (MU): A clearly defined forest area with mapped boundaries, managed by a single managerial body to a set of explicit objectives which are expressed in a self-contained multi-year management plan. Where there is management planning documentation at different levels, MU can be defined as the area at which the calculation is made of the yield which can be permanently sustained (as per criterion 5.6 and usually referred to as AAC (Annual Allowable Cut)).

## **FSC-STD-20-001 (V3-0) General Requirements for FSC Accredited Certification Bodies**

INT-STD-20-001_11	<b>How shall university education or ‘equivalent’ be interpreted according to the requirements for auditor qualification provided in the standard FSC-STD-20-001?</b>
Status	Withdrawn

INT-STD-20-001_17	<b>What happens if it is not possible or feasible to rotate the lead auditor after 3 consecutive audits?</b>
Status	Withdrawn

INT-STD-20-001_08	<b>Is it required to assess the Certificate Holder (CH) within the next 12 months from the last surveillance audit?</b>
Status	Withdrawn

INT-STD-20-001_02	<b>Clarification in the definition of “annually”.</b>
Status	Withdrawn

INT-STD-20-001_13	<b>How is the certification body expected to control the FSC trademark use of their clients following its approval?</b>
Status	Withdrawn

INT-STD-20-001_09	<b>Can a 3-days ISO 19011 training course (incl. exam) be accepted as qualification for lead auditors after 31 December 2012?</b>
Status	Withdrawn

INT-STD-20-001_07	<b>FSC-STD-20-001 requires that a chain of custody evaluation team shall always include at least one team member who is fluent in the language of the area in which the evaluation takes place, or a designated independent interpreter. Are there any scenarios that could warrant an exception to this rule, such as cases where the parent company has a standard corporate language requirement which is different from the local language?</b>
Status	Withdrawn

## FSC-STD-20-001 (V4-0) General Requirements for FSC Accredited Certification Bodies

<b>Code</b>	INT-STD-20-001_35
<b>Requirement (s)</b>	Term “audit process” as used in various requirements
<b>Publication date</b>	21 September 2018
<b>Which activities does FSC include in the “audit process” of an evaluation – when does it start and when does it end?</b>	
<p>The audit process starts from the moment when an auditor is authorized to conduct the audit of the applicant or certificate holder. It includes the preparation of the audit (by the auditor), follow up on results of stakeholder engagement (where applicable), on-site audit and desk audit activities, and ends with the submission of the draft audit report to the certification body.</p> <p>Note: Pre-audit steps of an evaluation include application review and setting up of a contract with the applicant (where applicable), assignment and authorization of the auditor(s) and stakeholder identification and notification (where applicable).</p> <p>Post-audit steps of an evaluation include the certification body review and finalising of the audit report and the certification decision.</p> <p>“Evaluation” includes the ‘audit’ and ‘post-audit’ steps above.</p>	

<b>Code</b>	INT-STD-20-001_39
<b>Requirement (s)</b>	Terms ‘certification’ and ‘certification decision’
<b>Publication date</b>	05 February 2019
<b>May a Certificate Holder request a ‘voluntary suspension’ of the FSC certification?</b>	
<p>No, a Certificate Holder (CH) is not in the position to request a voluntary suspension, because a suspension is a certification decision taken by the certification body and indicates a ‘third-party attestation’ related to FSC requirements.</p>	

<b>Code</b>	INT-STD-20-001_28 (also published under FSC-PRO-20-003 with code INT-PRO-20-003_04)
<b>Requirement (s)</b>	Clause 1.1.3
<b>Publication date</b>	09 April 2018: amended 14 January 2025
<p><b>A. Does FSC-PRO-20-003 also apply to cases where the certificate holders (affected clients) are required to transfer to a new CB, within six (6) months to maintain their certification, due to changes in the accreditation status of the former CB; and</b></p>	

**B. What will be the consequences if the affected clients do not transfer to a new CB within six (6) months?**

**A. Within six (6) months of changes in the accreditation status of the former CB**

1. Yes, FSC-PRO-20-003 applies to non-voluntary transfer of affected clients with the following exceptions:
  - a) a transfer audit is not needed;
  - b) an agreement between former and new CB is not needed;
  - c) the limit of transfer once per certification cycle does not apply;
  - d) a transfer with open major nonconformities and/or suspended certification status is permitted.
2. The certification status of the affected client remains valid unless the certification is expired or withdrawn.

NOTE: In case of questions on non-voluntary transfers, the certificate holder (affected client) can approach FSC (at national, regional, or international level).

**B. After six (6) months of changes in certification body's accreditation status**

1. The former CB shall terminate the certification of the affected clients that have not moved to a new CB.
2. If the step 1 above is not implemented, FSC reserves the right to declare the certification of the affected clients as terminated.

<b>Code</b>	INT-STD-20-001_43
<b>Requirement (s)</b>	Clause 1.2.3
<b>Publication date</b>	4 October 2022

**On which basis can a CB ask for information or data from a CH that are not specified in the normative requirements in relation to the scope of certification of the CH?**

FSC-STD-20-001 V4-0 Clause 1.2.3 requires CBs to include into their agreement with clients provisions that give CBs (as well as ASI and FSC) the explicit right to access confidential information and examine documentation as deemed necessary (Clause 1.2.3 q). In addition, a CB can make its certification decision dependent on the activities of their clients with regards to cooperating with them in fulfilling their obligations from the accreditation contract (Clause 1.2.3 o).

When implemented as required, CBs can refer to their certification agreement with the CH as the basis for requiring needed information or data.

<b>Code</b>	INT-STD-20-001_22
<b>Requirement (s)</b>	Clause 1.2.3 q)
<b>Publication date</b>	08 September 2017

**Can certification bodies require access to organization's records related to non-FSC materials and products for the purpose of verifying organization's conformity with applicable certification requirements?**

Yes, certification bodies can require access to records related to non-FSC materials and products when this information is relevant to confirm organizations' conformity with the applicable certification requirements. This is established through the legally enforceable certification agreement between certificate holders and certification bodies, in which FSC certificate holders agree that the certification body, FSC and ASI have the right to access confidential information, examine documentation deemed necessary, and access to the relevant equipment, location(s), area(s), personnel, and bodies providing outsourced services to clients.

<b>Code</b>	INT-STD-20-001_19
<b>Requirement (s)</b>	Clause 1.2.3u)
<b>Publication date</b>	01 July 2016; amended 19 April 2022

**Shall the certification body identify a nonconformity in cases where the client has continued to sell material as FSC certified despite being suspended?**

No, nonconformity in this case is not applicable. The certification body shall refer to the certification contract between the certification body and the client, as the contract shall stipulate the obligations of clients in case of suspensions. If the suspended client continues to sell material as FSC certified this is a breach of the certification contract which can be sanctioned accordingly.

<b>Code</b>	INT-STD-20-001_01
<b>Requirement (s)</b>	Clause 1.2.3u (ii)
<b>Publication date</b>	21 February 2011; amended 19 April 2022

**What is meant by “certified and uncertified” customers?**

The following customers are considered certified and uncertified customers who:

- Bought certified material;
- Placed an order or submitted an enquiry for certified products;
- Otherwise expressed an interest in purchasing certified products.

<b>Code</b>	INT-STD-20-001_15
<b>Requirement (s)</b>	Clause 1.4.6

<b>Publication date</b>	07 October 2014; amended 19 April 2022
<p><b>A certificate holder having a single management unit (MU) in the scope of certification has applied for a change of the scope to add a significant new area to the MU. If major non-conformities (NCs) are identified in the area to be added during the change of scope audit or the surveillance audit prior to the decision, is their correction a precondition to grant the change of scope?</b></p> <p>Yes, if the major non-conformity is linked to the area to be added. If the major non-conformity is independent of the area to be added, but linked to the overall management system, the area can be added to the certificate before the non-conformity is closed.</p>	

<b>Code</b>	INT-STD-20-001_14
<b>Requirement (s)</b>	Clause 1.4.6
<b>Publication date</b>	06 October 2014; amended 19 April 2022
<p><b>Is it possible to split an existing FSC Forest Management certificate into two separate certificates, following a surveillance evaluation?</b></p> <p>Yes, provided that in the surveillance evaluation this change of the scope was evaluated according to FSC-STD-20-007 Clause 6.2.1.</p> <p>If the change of the scope was not evaluated in the surveillance evaluation, another evaluation according to the requirements above will be required.</p>	

<b>Code</b>	INT-STD-20-001_12
<b>Requirement (s)</b>	Clause 1.5.4; Annex 1
<b>Publication date</b>	19 May 2014; amended 19 April 2022
<p><b>Is it considered a conflict of interest if an FSC accredited certification body is formally recognised as a Monitoring Organisation according to the EU Timber Regulation (# 995/2010) and in this function monitors its FSC certified clients?</b></p> <p>No, FSC does not consider it a conflict of interest, if an FSC accredited certification body is also servicing their FSC certified clients as Monitoring Organisation in the context of the EUTR, as this service does not cover compliance elements of the FSC standards.</p>	

<b>Code</b>	INT-STD-20-001_46 (also published under; FSC-STD-40-004 with code INT-STD-40-004_66
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	FSC-STD-60-004 with code INT-STD-60-004_04 FSC-PRO-01-008 with code INT-PRO-01-008_01)
<b>Requirement (s)</b>	Clause 1.9
<b>Publication date</b>	07 December 2023

**Do the principles of the FSC Dispute Resolution System allow entities handling complaints to include and apply processes for handling persistent or vexatious complaints?**

Yes, Clause 1.3 of <FSC-PRO-01-008 V2-0 Processing Complaints in the FSC Certification Scheme> on procedural fairness relates to the criteria to be used by the entity handling complaints in the FSC system to make decisions about the inadmissibility of complaints. In particular, the entity handling complaints should ensure that any individual or organization has access to the FSC dispute resolution system for the purposes for which it is designed. Accordingly, the entity handling complaints shall ensure that a complaint is addressed to the correct entity according to the lowest-level principle, meets all formal requirements, is well-founded and is not abusive. These criteria enable stakeholders to be assured of a timely and effective dispute resolution system with a view to obtaining remedy.

Accordingly, entities handling complaints in the FSC system may include and apply processes as part of their complaints procedure for handling complaints that are persistent or vexatious in order to ensure the continued functioning of their operations and complaints processes, and to protect the health and well-being of their staff.

## A. Scope

This interpretation is applicable to complaints procedures managed by:

- a) FSC in relation to <FSC-PRO-01-008 Processing Complaints in the FSC Certification Scheme> and <FSC-PRO-01-009 Processing FSC Policy for Association Complaints>;
- b) Certification bodies in relation to Clause 1.9 of <FSC-STD-20-001 V4-0 General requirements for FSC accredited certification bodies>;
- c) Certificate holders in relation to:
  - i. Clause 1.7 of <FSC-STD-40-004 V3-1 Chain of Custody Certification> (for chain of custody);
  - ii. IGI 1.6.1, 2.6.1 and 4.6.1 of <FSC-STD-60-004 V2-1 International Generic Indicators> (for forest management).

When the entity handling the complaints in the FSC system is applying this interpretation, it shall consider the following:

### 1. Definitions

#### Persistent complaint:

A complaint:

- a) that has already been resolved and closed; or
- b) that has been submitted to any other entity handling complaints in the FSC system and are still under investigation; or
- c) that is similar to a previously submitted complaint, with no or minor additions/ variations and the complainant insists be treated as a new complaint.

**Vexatious complaint:**

A complaint:

- a) without reasonable or probable cause; or
- b) without good grounds or merit; or
- c) meant to cause trouble and harm, namely malicious; or
- d) meant to harass e.g., use of insulting and threatening language.

NOTE: this definition is adapted from: Garner BA and Black HC, Black's Law Dictionary, Thomson Reuters 2014

**2. Basic principles**

- 2.1 The presumption should always be that a complaint is made in good faith and that the abuse of the complaints and appeals mechanism is exceptional.
- 2.2 The concept of 'abuse' should be understood as the harmful exercise of the complaints mechanism for purposes other than those for which it is designed.
- 2.3 Every complaint shall be assessed for admissibility. Even if someone has made persistent or vexatious complaints in the past, it shall not be assumed that any other complaint they make will also be persistent or vexatious.
- 2.4 FSC does not tolerate violence and harassment in any form, whether direct or indirect by any party involved in a complaint.

**3. Procedural requirements**

- 3.1 The entity handling complaints in the FSC system shall assess and classify whether a complaint is 'persistent' or 'vexatious'.
- 3.2 A complaint classified as 'persistent' or 'vexatious' is considered inadmissible and can be rejected.
- 3.3 The decision on the inadmissibility of a complaint because of its persistent or vexatious nature shall be taken by the person/s having overall authority and responsibility for resolution of complaints.
- 3.4 The decision shall be recorded and communicated to the complainant within (2) weeks of making the decision.
- 3.5 The decision shall be communicated to their next higher level oversight body e.g. CB, ASI, FSC within (2) weeks of making the decision.

**4. Additional options for consequences**

4.1 If the complaint handling entity identifies the continuous submission of persistent and/or vexatious complaints by a complainant, the entity may impose further measures to prevent the abuse of the complaints mechanism. These additional consequences shall be proportionate to the abusive conduct of the complainant.

4.2 These consequences may include but are not limited to:

- a) Placing limits on the number and duration of contacts with staff per week or month;
- b) Offering a restricted timeslot for necessary contacts;
- c) Limiting the complainant to one method of contact access channel (telephone, letter, email etc);
- d) Providing a single point of contact;
- e) Only considering a certain number of issues in a specific period with a request to prioritize;
- f) Responding to the overall issue rather than each and every enquiry or complaint that has been classified as persistent and/or vexatious;
- g) Considering complaints that have been classified as persistent and/or vexatious as stakeholder comments and addressing them during the next audit.

NOTE: Access to the complaint mechanism is to be ensured and therefore blocking a complainant is not allowed.

4.3 In most cases such consequences should apply for a limited period of time, e.g. between three and six months but in exceptional cases may be extended. In such cases the restrictions should be reviewed on a regular basis.

<b>Code</b>	INT-STD-20-001_47
<b>Requirement (s)</b>	Clause 1.9.1 a)
<b>Publication date</b>	07 December 2023

#### **What does 'present the complaint' in Clause 1.9.1 a) mean?**

The term 'present' refers to the receipt of a complaint in accordance with the procedures of the certification body. It does not refer to the possibility for the complainant to have a meeting remotely or in person with the entity as per Clause 1.9.1 a) of <FSC-STD-20-001 V4-0 General requirements for FSC accredited certification bodies>.

<b>Code</b>	INT-STD-20-001_44
<b>Requirement (s)</b>	Clause 1.9.2
<b>Publication date</b>	04 October 2022

**What is meant by "country of operation"?**

Country of operation for chain of custody and for forest management certification means the country where the sites or the management units in the scope of certification are located.

<b>Code</b>	INT-STD-20-001_25
<b>Requirement (s)</b>	Clause 1.9.7
<b>Publication date</b>	07 February 2018

**How are CBs expected to comply with Clause 1.9.7 that requires all complaints to be registered with FSC?**

Until further notice CBs are not required to register complaints with FSC.

Once a Complaints Management System is established by FSC, CBs will be required to register all complaints with FSC through such system, following Clause 1.9.7 of the FSC-STD-20-001 V4.0.

FSC will inform CBs accordingly about when such system is available.

<b>Code</b>	INT-STD-20-001_06
<b>Requirement (s)</b>	Clause 3.1.8b
<b>Publication date</b>	28 May 2013; amended 19 April 2022

**Can an ASI witness audit be substituted for a witness audit carried out by the CB to meet the requirements of 3.1.8b? In other words does a witness audit performed by ASI on a particular Lead audit fulfill this requirement or are CBs required to conduct a witness audit of every lead audit regardless of whether or not they have been witnessed by ASI to conform to this requirement?**

No, the responsibility for complying with the requirements of FSC-STD-20-001 cannot be "outsourced" to ASI.

<b>Code</b>	INT-STD-20-001_40
<b>Requirement (s)</b>	Clause 3.2.1
<b>Publication date</b>	14 August 2019

**Clause 3.2.1 indicates that the use of external personnel is not considered outsourcing. What is the definition of external personnel?**

Individuals engaged by a CB to conduct certification activities under the direct supervision and control of the CB, and not directly employed and/ or compensated for their work by the CB, are considered external personnel.

Note: It is irrelevant whether the individual(s) engaged by the CB as personnel and/or the entity providing personnel to the CB are residing and/or conducting business in the same country as the CB, and/ or have shared investment or ownership in or are affiliated in any other way with the CB.

<b>Code</b>	INT-STD-20-001_42
<b>Requirement (s)</b>	Clause 3.2.1
<b>Publication date</b>	06 November 2019

**Clause 3.2.1 indicates that the certification body may outsource work. What is the definition of 'outsourced work'?**

'Outsourced work' refers to the implementation of work activities:

- provided by (an) independent third party(ies) (service provider) under contract to the CB; and
- which are not executed under direct authority of, and/ or as directly advised / supervised by the CB; and
- which are executed under direct authority of, and/ or as directly advised / supervised by the independent third party (service provider) contracted by the CB for delivery of the outsourced work.

Note: It is irrelevant whether the entity providing outsourced work to the CB is residing and/or conducting business in the same country as the CB, and/ or has shared investment or ownership in or is affiliated in any other way with the CB.

<b>Code</b>	INT-STD-20-001_48
<b>Requirement (s)</b>	Clause 3.2.1
<b>Publication date</b>	14 January 2025

**Can a legal entity that provides outsourced services to a certification body further outsource the work related to certification to another legal entity?**

No, the legal entity that provides the outsourced services cannot further outsource the work related to certification to another legal entity.

NOTE 1: The certification activities conducted by the subsidiary of a legal entity where the subsidiary is under the ownership and control of the legal entity that is providing outsourced

services to the certification body, is not considered further outsourcing if the subsidiary is included in the legally enforceable agreement with the certification body.

<b>Code</b>	INT-STD-20-001_27
<b>Requirement (s)</b>	Clause 4.1.10
<b>Publication date</b>	20 March 2018
<b>Can the same area belong to two different certificates, being the scope of one of the certificates forest plantations and the scope of the other game?</b>	
No, the situation described is not allowed. The site is also part of the scope definition, not only the product and therefore the scope would be overlapping.	
According to Clause 4.1.10, certification bodies shall reject applications for certification of management units or sites that are already covered by a valid or suspended FSC certification, except where a certification transfer process according to FSC-PRO-20-003 is ongoing.	

<b>Code</b>	INT-STD-20-001_24 (also published with code INT-STD-20-007_46)
<b>Requirement (s)</b>	Section 4.4
<b>Publication date</b>	24. January 2018
<b>FM group members (sub-group A) will leave an existing FM group (B) with a valid certificate and switch to / re-establish a separate group certificate for A, staying with the same certification body. A hold a group certificate in the past before merging with B.</b>	
<p><b>a) Shall the upcoming assessment be made according to a pre-evaluation, a main evaluation or a re-evaluation?</b></p> <p><b>b) Are peer reviews required for A, who have been certified since 15 years and who were peer-reviewed 15 years ago?</b></p> <p>a) Former members of groups are considered applicants for certification if they leave the group and apply for a new certificate.</p> <p>As the pre-evaluation is conducted to determine the applicant's readiness for their main evaluation, in this scenario a pre-evaluation may be waived, even if required by FSC-STD-20-007 Section 3, if the upcoming assessment is done no later than 12 months of the group members leaving the group.</p> <p>In that case, the assessment shall be conducted following the requirements of a main evaluation.</p> <p>b) Yes, the certification body is required to submit the evaluation report for peer review following the requirements in FSC-STD-20-001 V4-0 EN Section 4.4 Audit review.</p>	

<b>Code</b>	INT-STD-20-001_31
<b>Requirement (s)</b>	Clause 4.3.16
<b>Publication date</b>	25 May 2018; amended 18 June 2019
<p><b>According to Clause 4.3.16 of FSC-STD-20-001 the corrective action request (CAR) timelines commence from the moment when they are formally presented to the client and no later than three (3) months from the audit closing date. Do these timelines also apply in the case of applicants?</b></p> <p>No, in the case of applicants, the following applies:</p> <ol style="list-style-type: none"> <li>minor CAR timelines apply from the date of a positive certification decision.</li> <li>major CARs need to be corrected before certification is granted in accordance with Clause 1.4.1b) of FSC-STD-20-001.</li> <li>Additionally, maximum timelines for certification decisions apply as specified in Clause 4.5.5 of FSC-STD-20-001.</li> </ol>	

<b>Code</b>	INT-STD-20-001_41
<b>Requirement (s)</b>	Clause 4.3.16
<b>Publication date</b>	14 August 2019
<p><b>What can be considered as exceptional and justified circumstances to allow extension of the deadline for closure of nonconformities?</b></p> <p>Exceptional and justified circumstances to extend the deadline for closure of nonconformities are situations which are beyond the control of the CB and/or the certificate holder. They shall be documented by the CB.</p> <p>The following situations are considered typical as being beyond the control of the CB and/ or certificate holder:</p> <ul style="list-style-type: none"> <li>- Natural disaster;</li> <li>- Epidemic;</li> <li>- Armed conflict;</li> <li>- Unexpected event at the certificate holder that prevented the certificate holder from implementing the corrective actions within the defined timeline;</li> <li>- New or significantly changed requirements (see Clause 12.3 of FSC-PRO-01-001).</li> </ul>	

<b>Code</b>	INT-STD-20-001_04
<b>Requirement (s)</b>	Clause 4.6.1; 4.6.5

<b>Publication date</b>	22 May 2012; amended 19 April 2022
<p><b>A resource manager, located in country A, manages forestlands in country B (type II group scheme). All forestlands are owned by foreign investors with permanent addresses in country A. No permanent address exists in country B. Certificate holder is the forest manager as resource manager.</b></p> <p><b>The challenge faced is that the FSC Database only allows including one country. Hence, there is confusion about the “allocation of the FM certificate and certified area”.</b></p> <p>Additional Information on the management units (MUs) (such as location, etc.) should be presented in the optional field “MU comment” of the database.</p>	

<b>Code</b>	INT-STD-20-001_18 (also published under FSC-PRO-20-003 with code INT-PRO-20-003_06)
<b>Requirement (s)</b>	Clause 4.6.3
<b>Publication date</b>	14 December 2015; amended 19 April 2022
<p><b>Clause 5.1 of FSC-PRO-20-003 requires the preceding certification body to remove all data from the certificate holder’s entry in the FSC database that the certification body considers to be confidential. What happens with public summary reports when a certificate is transferred?</b></p> <p>Public summary reports are not considered confidential per definition and shall therefore be kept in the FSC database of certificates to remain publicly available.</p>	

<b>Code</b>	INT-STD-20-001_32
<b>Requirement (s)</b>	Clause 4.6.5
<b>Publication date</b>	25 May 2018
<p><b>Are CBs required to specify version numbers of normative documents on paper certificates?</b></p> <p>No, it is acceptable to omit reference to version numbers on paper certificates.</p> <p>Note: The FSC certification database is the main source of information on the certification status of certificate holders. CBs need to agree with certificate holders whether to issue paper certificates and when to provide updated versions.</p>	

<b>Code</b>	INT-STD-20-001_50
<b>Requirement (s)</b>	Table 1
<b>Publication date</b>	23 July 2025

**If a certification body changes its certification body initials, how long is it permitted to continue using the old initials in certification registration codes?**

1. Certification bodies may allow existing clients to keep the certification registration code with former initials until recertification.
2. All clients certified after the effective date of changes in certification body initials as agreed with ASI, shall be assigned a certification registration code with new initials.
3. The certification body shall inform all affected clients - those with certification registration codes containing the former certification body initials - of the change of their certification code within thirty (30) calendar days of the effective date of change in certification body initials.
  - a) The communication shall include the reason for the change in the certification registration code and the timeline for transition to the certification registration code with newly assigned initials.
  - b) The certification bodies shall notify FSC at [assurance.quality@fsc.org](mailto:assurance.quality@fsc.org) once the communication has been completed with all affected clients and once all affected clients have been transferred to the certification registration code with the new initials.

<b>Code</b>	INT-STD-20-001_16
<b>Requirement (s)</b>	Clause 4.6.5, Table 1
<b>Publication date</b>	21 November 2014; amended 19 April 2022

**Can an FM/CoC Certificate Holder sell certified material as FSC Controlled Wood?**

Yes. The FM-CoC Certificate Holder may opt to sell FSC certified material as FSC Controlled Wood by downgrading the output claim\*, subject to the following conditions:

- The Certificate Holder shall conform to all applicable requirements for FSC Controlled Wood claims provided in FSC-STD-50-001 and Annex 3 of the standard FSC-STD-30-010;
- The Certification Body shall issue an additional certificate code of the form: XXX-FM/CW-#####-ABC, where XXX are the initials of the certification body agreed with FSC, ##### is a unique six digit number or combination of numbers and letters issued by the Certification Body itself, and ABC is a sub-certificate code issued only to the members of group certificates, in the form, A, B, C, AA, AB, etc.).

For reasons of clarity the Certification Body shall not use the same code number for valid certificates issued to different legal entities (i.e., the Certification Body would not issue a CoC certificate XXX-COC-123456 to company A, and an FM certificate XXX-FM-123456 to company B).

If a certificate is withdrawn and later re-issued to the same legal entity, the original registration code may be used.

- The FM certificate code shall be used for the identification of the certificate. The FM/CW code shall be included along with the FM certificate code in the certification reports prepared according to the standard FSC-STD-20-007a and in the public summary reports prepared according to the standard FSC-STD-20-007b.

- The FM/CW code shall be used to make FSC Controlled Wood claims on invoices.

\* Please see FSC-STD-40-004 V3-0 Clause 5.9 on downgrading claims for Chain of Custody certification.

<b>Code</b>	INT-STD-20-001_05
<b>Requirement (s)</b>	Clause 1.4.1a; 4.6.5
<b>Publication date</b>	07 September 2012; amended 19 April 2022

**Is it possible to issue certificates to non-registered entities?  
Are the following examples possible?**

**Certificate issued to "MU ABC" or "Certification Group XYZ" (not necessarily a legal entity) represented by Forest Management Enterprise Ltd. (legal entity) Woodstreet 1, 12345 Greenhills. Timberland**

No, it is not possible to issue certificates to unregistered entities. Certificates shall be issued to legal entities.

According to Clause 4.6.5c in FSC-STD-20-001 V4-0, all FM and COC certificates shall include (...) the legal name and registered address of the client.

<b>Code</b>	INT-STD-20-001_20
<b>Requirement (s)</b>	Clause 4.6.7
<b>Publication date</b>	01 July 2016; amended 12 July 2019

**May certification bodies issue a sub-certificate to Participating Sites of a group or multi-site certificate?**

Yes, certification bodies may optionally do so, irrespective of whether it is publicly visible in the FSC database (info.fsc.org). Where issued, sub-certificates shall include:

- a clear reference to the group or multi-site organization holding the certificate;

b) a reference to the scope of the Participating Site (which needs to be covered by the scope of the main certificate);
c) the sub-certificate code issued to the Participating Site.

**Code** INT-STD-20-001\_49

**Requirement (s)** Clause 4.7.1

**Publication date** 14 January 2025

**When a certification body's accreditation is withdrawn (either voluntarily or as a result of an ASI accreditation decision), its clients have 6 months to find a new certification body to maintain their certifications valid. In case a surveillance evaluation is due during this period, until when does the new certification body have time to conduct the surveillance evaluation of the affected client?**

For affected clients where the surveillance evaluation is due, the new certification body will have six (6) months from the date of withdrawal of the former certification body accreditation to conduct their surveillance evaluation.

NOTE: All other requirements including the requirement to have four (4) surveillance audits within one certification cycle remain unaffected.

**Code** INT-STD-20-001\_26

**Requirement (s)** Clause 4.7.3

**Publication date** 07 February 2018

**Is it permissible to accept evidence of conformity related to identified nonconformities after the audit closing meeting but prior to formal decision making by the CB? And could this lead to closure of one or more major nonconformities, thereby avoiding the suspension of the certificate?**

It is permissible to consider additional evidence of certificate holders that address identified nonconformities until the certification decision is formalized by the CB. However a suspension of the certificate can only be avoided if all major nonconformities are closed as part of the certification decision. If 5 or more major nonconformities are identified and not all of them are closed as part of the certification decision the certificate shall be suspended.

**Code** INT-STD-20-001\_29

**Requirement (s)** Clause 4.7.3

<b>Publication date</b>	09 April 2018
<b>What is the required timeframe for suspension of certificates in case 5 or more major nonconformities are detected at the surveillance audit?</b>	
According to FSC-STD-20-001 V4-0 Clause 4.7.3, the suspension shall occur within ten (10) business days of the certification decision being taken. In case of (5 or more) major nonconformities the certification decision shall be taken as fast as possible, considering the seriousness and risks of the detected major nonconformities, but should not be taken later than 30 days from the audit closing date.	

<b>Code</b>	INT-STD-20-001_33
<b>Requirement (s)</b>	Clause 4.7.3
<b>Publication date</b>	12 June 2017
<b>How can we interpret Clause 4.7.3 of FSC-STD-20-001 V4-0 in relation to Clause 12.3 of FSC-PRO-01-001 V3-1? If there are a large number of new or significantly changed requirements which result in 5 major CARs, does the certificate need to be suspended or can the extended timelines be granted as per the FSC procedure?</b>	
The occurrence of 5 or more major nonconformities is considered a breakdown of the clients' management system regardless whether these nonconformities relate to new or significantly changed requirements and therefore shall lead to a suspension of the certificate in accordance with Clause 4.7.3 of FSC-STD-20-001 V4-0.	

<b>Code</b>	INT-STD-20-001_37
<b>Requirement (s)</b>	Clause 4.8.2
<b>Publication date</b>	20 December 2018
<b>Are CBs allowed to carry out desk audits to evaluate certificate holders' conformity against new versions of normative documents during the transition period?</b>	
No, unless explicitly allowed (either by INT-STD-20-011_19, or as defined in the new version of the normative document) CBs are not allowed to carry out desk audits to evaluate certificate holders' conformity against new versions of normative documents.	

<b>Code</b>	INT-STD-20-001_21
<b>Requirement (s)</b>	Clause 4.8.2

Publication date	15 March 2017
Where a newer FSC standard contradicts an older FSC standard, should CBs follow the newer standard? For example:	
<ul style="list-style-type: none"> <li>• FSC-STD-20-001 V4-0 states that a major nonconformity shall be corrected within three months (Clause 4.3.16b) whereas FSC-STD-20-012 V1-1 Clause 7.7 states that a CW FM certificate shall be suspended immediately if a major nonconformity is identified.</li> <li>• FSC-STD-20-001 V4-0 has removed “repeated” from the definition of major nonconformity (Clause 4.3.13b) (since “repeated” is not necessarily “systematic”), whereas FSC-STD-20-012 V1-1 (Clause 7.5a) and FSC-STD-20-007 V3-0 (Clause 8.8b) still contain the word “repeated”.</li> </ul>	
The answer depends on the following three scenarios that can occur:	
<p>(I) There is a perceived contradiction between rules in two versions of the same standard. In this case the new rule must be applied once the certificate holder has transitioned to the new version of standard.</p> <p>(II) There is a perceived contradiction between rules in different standards. In this case both rules are valid in the context of the scope of the respective standard (see examples above)</p> <p>(III) There is a contradiction between rules in different standards. In this case the newer rule supersedes the older rule.</p>	

Code	INT-STD-20-001_45
Requirement (s)	Clause 4.8.3
Publication date	15 February 2023
<ol style="list-style-type: none"> <li>1. Can a CB grant certification to a single branch of the State Specialized Forest Enterprise (SFE) "Forests of Ukraine" after the change in structure or legal ownership introduced by the Resolution of the Cabinet of Ministers of Ukraine No. 1003 "Some issues of reforming the management of the forestry sector" dated 07.09.2022 and later normative acts?</li> <li>2. Are CBs in Ukraine expected to require their clients representing single branches of State Forest Enterprise (SFE) "Forest of Ukraine" to sign the most recent version of the 'License Agreement for the FSC Certification Scheme', in response to the changes in the structure or legal ownership of the State Specialized Forest Enterprise "Forests of Ukraine"?</li> </ol> <ol style="list-style-type: none"> <li>1. Yes, the CB can grant certification to a single branch of SFE "Forest of Ukraine".</li> <li>2. Yes, in response to the changes in the structure and legal ownership of the State Specialized Forest Enterprise "Forests of Ukraine", CBs shall require the certificate holders to enter into and hold the most recent version of the 'License Agreement for the FSC Certification Scheme', as well as ensure that the signed agreements uniformly identify the contracting party according to the following example: SFE "Forests of Ukraine", Branch "XYZ".</li> </ol>	

<b>Code</b>	INT-STD-20-001_23
<b>Requirement (s)</b>	Annex 2
<b>Publication date</b>	03 June 2016
<p><b>Can tertiary education (i.e. master or doctor) in relevant disciplines be converted into partial professional experience for FM auditor candidates?</b></p> <p>In general no, we consider tertiary education part of the education and not part of the professional experience. However, we accept a Ph.D. in Forestry (or equivalent) as counting for 1 year equivalent of work experience.</p>	

<b>Code</b>	INT-STD-20-001_30
<b>Requirement (s)</b>	Annex 2, Table 2, Section 1.2; Annex 2, Table 3, Section 2.2
<b>Publication date</b>	09 April 2018
<p><b>According to the auditor qualification requirements for CoC and FM at least three (3) on site audit days per year are required for auditors to maintain their qualification. Does it mean that a CoC auditor needs to perform three (3) CoC audits and an FM auditor three (3) FM audits respectively?</b></p> <p>Yes, the required audit days relate to the scope of qualification. An auditor registered for FM and CoC needs to perform at least six (6) audit days per (calendar) year, three (3) for each scope.</p>	

<b>Code</b>	INT-STD-20-001_36
<b>Requirement (s)</b>	Annex 2, table 2, Section 1.2; Annex 2, table 3, Section 2.2
<b>Publication date</b>	21 September 2018
<p><b>Does an auditor with both FM and CoC scope need to have separate witness audits for FM and CoC?</b></p> <p>Yes, Witness audits are scope specific. An auditor with both FM and CoC scope shall be witnessed for both CoC and FM every 3 years. Witness audits for other certification schemes are not applicable for the FSC scheme.</p>	

<b>Code</b>	INT-STD-20-001_34
<b>Requirement (s)</b>	Annex 2, table 2, Section 1.2; Annex 2, table 3, Section 2.2
<b>Publication date</b>	06 September 2018

**What are the conditions for lifting the suspension of an auditor who has not met the requirements for continuous auditor qualification according to FSC-STD-20-001?**

In order to lift the suspension the auditor has to successfully address the nonconformities that led to the suspension:

- 1) Ongoing FSC training: If the auditor has not received ongoing training in relation to changes in the FSC system, the suspension is lifted when the training has been successfully completed.
- 2) On-site audits: In case an auditor completes less than three (3) on-site audits days per year, a suspension can be avoided if the auditor has achieved the number of required audits until the end of March of the following year. Otherwise, the auditor needs to be suspended from April onwards and needs to be successfully witnessed again in order to lift the suspension.
- 3) Witness audit: if the auditor was not been witnessed in 3 years, the suspension is lifted after being successfully witnessed.

<b>Code</b>	INT-STD-20-001_38
<b>Requirement (s)</b>	Annex 2, Table 3, 2.1
<b>Publication date</b>	20 December 2018; amended 3 September 2021

**Is professional experience as a registered ISO 9001 auditor/ lead auditor or as a chain of custody auditor for certification systems with ISEAL membership accepted as equivalent to professional experience in the forest products sector?**

Yes, the following professional experience is accepted as equivalent to experience in the forest product sector, provided that the requirements for education and minimum professional working years are complied with:

- registered CQI (formerly called IRCA) ISO 9001 auditor/lead auditor; or
- registered Exemplar Global (formerly called RABQSA) ISO 9001 auditor/lead auditor; or
- registered ICA ISO 9001 auditor/lead auditor; or
- in China: registered CCAA ISO 9001 auditor/lead auditor; or
- demonstrated experience as chain of custody auditor for certification systems with ISEAL membership (e.g. MSC, UTZ, RSPO).

<b>Code</b>	INT-STD-20-001_10
<b>Requirement (s)</b>	Annex 2, table 2; Annex 3, Clause 1.5 and 1.6
<b>Publication date</b>	05 February 2014; amended 19 April 2022

**Shall CB auditors and CB audit teams conducting Controlled Wood evaluations at management unit (MU) level (according to FSC-STD-40-005 V3-1, Annex C) have the same qualification as for evaluations of Forest Management Enterprises (according to FSC-STD-30-010)?**

Yes, CB auditors conducting Controlled Wood evaluations at management unit (MU) level shall comply with auditor qualifications specified in FSC-STD-20-001, Annex 2, table 2. Audit teams shall comply with qualifications as specified in FSC-STD-20-001, Annex 3, Clause 1.5 and 1.6.

<b>Code</b>	INT-STD-20-001_51
<b>Requirement (s)</b>	Annex 2, Table 2 and Annex 3, Clause 1.6 of FSC-STD-20-001 V4-0 Annex 2, Table 2 and Annex 3, Clause 1.12 of FSC-STD-20-001 V5-0
<b>Publication date</b>	03 February 2026

**Does the following apply to chain of custody accredited certification bodies with controlled wood clients:**

- a) **Is the certification body required to have access to forest management auditors in case their controlled wood clients do not need to be audited at the forest level?**
- b) **Can the certification body qualify and maintain the qualification of forest management auditors in accordance with Annex 2, Table 2, in case audits at forest level need to be conducted?**

  

- a) No, the requirement to include a forest management auditor in the audit team only applies when a forest-level audit is required for controlled wood audits.
- b) No, a chain of custody accredited certification body cannot qualify or maintain the qualification of forest management auditors. However, the certification body shall have a documented procedure to verify the initial and ongoing qualification of forest management auditors (e.g. training, professional experience, performance evaluations) and shall maintain records of such verification. The use of auditors who are already qualified under a forest management-accredited certification body is permitted only in this case.

# PROCEDURES

## FSC-PRO-01-001 (V4-0) The Development and Revision of FSC Requirements

<b>Code</b>	INT-PRO-01-001_01 (also published under FSC-STD-60-006 with code INT-STD-60-006_01)
<b>Requirement (s)</b>	Section 14
<b>Publication date</b>	14 March 2016

### Which body is responsible to give formal and binding interpretations of National Forest Stewardship Standards?

Interpretation of National Forest Stewardship Standards:

- Requests for interpretations of National Forest Stewardship Standards may originate from accredited Certification Bodies (CBs), Certificate Holders (CHs) or interested stakeholders in the country (or region) covered by the scope of the Forest Stewardship Standard.
- The Interpretation request(s) shall be made on specific issues in the Forest Stewardship Standard. It should include clear and correct reference to the indicator(s) for which the interpretation is requested, some background information and suggested response.
- Interpretation request(s) shall be sent to FSC National Office (NO) or registered Standards Development Groups (SDG) for processing where these bodies exist. Where they do not exist, interpretation requests shall be sent to the FSC Policy and Standards Unit (PSU).
- NOs or registered SDGs shall be responsible for developing interpretation(s) to their Forest Stewardship Standards.
- Before addressing the interpretation request, the NO or registered SDG shall first seek if there is an existing interpretation(s) addressing the issue in the Forest Stewardship Standards interpretation database available in the IC website.
- If there is already an approved interpretation(s) on the issue it shall be adopted as appropriate.
- All Interpretation(s) developed by NOs or registered SDGs shall be sent to the FSC PSU for formal approval and publishing in the FSC IC website.

**NOTE:** Interpretation(s) are only valid after the review and approval of the FSC PSU. It is the responsibility of the NO or the registered SDG to analyze any requests or need for interpretation of Forest Stewardship Standards.

- Interpretation(s) developed by NOs or registered SDGs shall be presented to the FSC PSU as illustrated in Box1.

Box 1.

## **FORMAT FOR INTERPRETATIONS**

**Keyword(s):** [name a few key words that define/classify the enquiry]

**Enquiry:** [formulate the interpretation request as a question; background may be included]

**Proposed Interpretation:** [propose a response]

**Normative Reference:** [the FSC Forest Stewardship Standard and indicator the enquiry refers to]

- NO or registered SDGs, shall decide on the process to develop and consult on interpretation(s) prior to submitting it to the FSC PSU.

**NOTE:** The process shall be designed in relation to the scale and controversy of the issue, considering the requirements set out in this standard and shall uphold FSC values of stakeholders' engagement.

- FSC PSU shall process interpretation requests from NO or registered SDG in line with its internal procedure (section 3 of the *PSU Enquiry Procedure*; *PSU-PRO-10-201 V1-1EN*).
- The FSC PSU shall evaluate the proposed interpretation(s) and respond within thirty (30) days
- If interpretation(s) are approved they shall be registered in the PSU interpretation database and the NO or SDG shall be informed accordingly.
- All approved interpretation(s) shall be published by the NO or SDG and national stakeholders informed accordingly.

<b>Code</b>	INT-PRO-01-001_02
<b>Requirement (s)</b>	Section 11
<b>Publication date</b>	23 July 2025

### **What are the official FSC languages and which language version shall prevail in case of differences between translated versions?**

FSC has three official languages; English, Spanish and French.

All international normative and supportive requirements are first developed and approved in English. In case of doubt or if there is any difference between the translated version and the approved English version, the English version shall prevail.

## FSC-PRO-01-008 (V2-0) Processing Complaints in the FSC Certification Scheme

<b>Code</b>	INT-PRO-01-008_01(also published under; FSC-STD-20-001 with code INT-STD-20-001_46 FSC-STD-40-004 with code INT-STD-40-004_66 FSC-STD-60-004 with code INT-STD-60-004_04)
<b>Requirement (s)</b>	Clause 1.3
<b>Publication date</b>	07 December 2023

**Do the principles of the FSC Dispute Resolution System allow entities handling complaints to include and apply processes for handling persistent or vexatious complaints?**

Yes, Clause 1.3 of <FSC-PRO-01-008 V2-0 Processing Complaints in the FSC Certification Scheme> on procedural fairness relates to the criteria to be used by the entity handling complaints in the FSC system to make decisions about the inadmissibility of complaints. In particular, the entity handling complaints should ensure that any individual or organization has access to the FSC dispute resolution system for the purposes for which it is designed. Accordingly, the entity handling complaints shall ensure that a complaint is addressed to the correct entity according to the lowest-level principle, meets all formal requirements, is well-founded and is not abusive. These criteria enable stakeholders to be assured of a timely and effective dispute resolution system with a view to obtaining remedy.

Accordingly, entities handling complaints in the FSC system may include and apply processes as part of their complaints procedure for handling complaints that are persistent or vexatious in order to ensure the continued functioning of their operations and complaints processes, and to protect the health and well-being of their staff.

### B. Scope

This interpretation is applicable to complaints procedures managed by:

- a) FSC in relation to <FSC-PRO-01-008 Processing Complaints in the FSC Certification Scheme> and <FSC-PRO-01-009 Processing FSC Policy for Association Complaints>;
- b) Certification bodies in relation to Clause 1.9 of <FSC-STD-20-001 V4-0 General requirements for FSC accredited certification bodies>;
- c) Certificate holders in relation to:
  - i. Clause 1.7 of <FSC-STD-40-004 V3-1 Chain of Custody Certification> (for chain of custody);
  - ii. IGI 1.6.1, 2.6.1 and 4.6.1 of <FSC-STD-60-004 V2-1 International Generic Indicators> (for forest management).

When the entity handling the complaints in the FSC system is applying this interpretation, it shall consider the following:

## 1. Definitions

### **Persistent complaint:**

A complaint:

- a) that has already been resolved and closed; or
- b) that has been submitted to any other entity handling complaints in the FSC system and are still under investigation; or
- c) that is similar to a previously submitted complaint, with no or minor additions/variations and the complainant insists be treated as a new complaint.

### **Vexatious complaint:**

A complaint:

- a) without reasonable or probable cause; or
- b) without good grounds or merit; or
- c) meant to cause trouble and harm, namely malicious; or
- d) meant to harass e.g., use of insulting and threatening language.

NOTE: this definition is adapted from: Garner BA and Black HC, Black's Law Dictionary, Thomson Reuters 2014

## 2. Basic principles

- 2.1 The presumption should always be that a complaint is made in good faith and that the abuse of the complaints and appeals mechanism is exceptional.
- 2.2 The concept of 'abuse' should be understood as the harmful exercise of the complaints mechanism for purposes other than those for which it is designed.
- 2.3 Every complaint shall be assessed for admissibility. Even if someone has made persistent or vexatious complaints in the past, it shall not be assumed that any other complaint they make will also be persistent or vexatious.
- 2.4 FSC does not tolerate violence and harassment in any form, whether direct or indirect by any party involved in a complaint.

## 3. Procedural requirements

- 3.1 The entity handling complaints in the FSC system shall assess and classify whether a complaint is 'persistent' or 'vexatious'.
- 3.2 A complaint classified as 'persistent' or 'vexatious' is considered inadmissible and can be rejected.
- 3.3 The decision on the inadmissibility of a complaint because of its persistent or vexatious nature shall be taken by the person/s having overall authority and responsibility for resolution of complaints.
- 3.4 The decision shall be recorded and communicated to the complainant within (2) weeks of making the decision.

3.5 The decision shall be communicated to their next higher level oversight body e.g. CB, ASI, FSC within (2) weeks of making the decision.

#### **4. Additional options for consequences**

4.1 If the complaint handling entity identifies the continuous submission of persistent and/or vexatious complaints by a complainant, the entity may impose further measures to prevent the abuse of the complaints mechanism. These additional consequences shall be proportionate to the abusive conduct of the complainant.

4.2 These consequences may include but are not limited to:

- h) Placing limits on the number and duration of contacts with staff per week or month;
- i) Offering a restricted timeslot for necessary contacts;
- j) Limiting the complainant to one method of contact access channel (telephone, letter, email etc);
- k) Providing a single point of contact;
- l) Only considering a certain number of issues in a specific period with a request to prioritize;
- m) Responding to the overall issue rather than each and every enquiry or complaint that has been classified as persistent and/or vexatious;
- n) Considering complaints that have been classified as persistent and/or vexatious as stakeholder comments and addressing them during the next audit.

NOTE: Access to the complaint mechanism is to be ensured and therefore blocking a complainant is not allowed.

4.3 In most cases such consequences should apply for a limited period of time, e.g. between three and six months but in exceptional cases may be extended. In such cases the restrictions should be reviewed on a regular basis.

## **FSC-PRO-01-017 (V1-1) Participation of External Observers in On-Site FSC Certification Audits and/or ASI Assessments**

<b>Code</b>	INT-PRO-01-017_01
<b>Requirement (s)</b>	Clause 3.1
<b>Publication date</b>	20 March 2018
<p><b>In a group certificate (type resource manager) several community forests are managed by one forest manager.</b></p> <p><b>Various representatives of the community want to participate in the external audit: the mayor (who represents the owner and signs contracts in the name of the forest owner), members of the council (who take part in decisions but are not employed by the community) and representatives of the political parties (who do not have right to take decisions for the community).</b></p> <p><b>Which of these stakeholders is classified as external observer and is required to sign a formal confidentiality agreement, according to FSC-PRO-01-017, clause 3.1?</b></p> <p>Any person different from the certificate holder (or the forest owner, if they are not the same) and the certification body shall sign a formal Non-Disclosure and Confidentiality Agreement prior to the audit.</p> <p>The mayor, as a legal representative of the forest owner, is not considered external and therefore is not required to sign a formal Non-Disclosure and Confidentiality Agreement. All the other parties are required to sign it</p>	

## FSC-PRO-20-003 (V1-0) Transfer of FSC Certificates and License Agreements

<b>Code</b>	INT-PRO-20-003_03
<b>Requirement (s)</b>	Scope
<b>Publication date</b>	06 June 2014
<p><b>a) Does FSC-PRO-20-003 apply to certificate holders that are moving from an individual certificate to a group certificate (as group members) under another certification body?</b></p> <p><b>b) Do these companies need to comply with FSC-PRO-20-003, in particular in Clause 2.2?</b></p> <p>a) No, this cannot be considered as moving the responsibility for maintaining active FSC certificate from one certification body to another.</p> <p>b) No, FSC-PRO-20-003 does not apply.</p>	

<b>Code</b>	INT-PRO-20-003_04 (also published under FSC-STD-20-001 with code INT-STD-20-001_28)
<b>Requirement (s)</b>	Clause 1.1.3 of FSC-STD-20-001
<b>Publication date</b>	09 April 2018: amended 14 January 2025
<p><b>C. Does FSC-PRO-20-003 also apply to cases where the certificate holders (affected clients) are required to transfer to a new CB, within six (6) months to maintain their certification, due to changes in the accreditation status of the former CB; and</b></p> <p><b>D. What will be the consequences if the affected clients do not transfer to a new CB within six (6) months?</b></p> <p><b>B. Within six (6) months of changes in the accreditation status of the former CB</b></p> <p>3. Yes, FSC-PRO-20-003 applies to non-voluntary transfer of affected clients with the following exceptions:</p> <ul style="list-style-type: none"> <li>a) a transfer audit is not needed;</li> <li>b) an agreement between former and new CB is not needed;</li> <li>c) the limit of transfer once per certification cycle does not apply;</li> <li>d) a transfer with open major nonconformities and/or suspended certification status is permitted.</li> </ul> <p>4. The certification status of the affected client remains valid unless the certification is expired or withdrawn.</p> <p>NOTE: In case of questions on non-voluntary transfers, the certificate holder (affected client) can approach FSC (at national, regional, or international level).</p> <p><b>B. After six (6) months of changes in certification body's accreditation status</b></p>	

<p>3. The former CB shall terminate the certification of the affected clients that have not moved to a new CB.</p> <p>4. If the step 1 above is not implemented, FSC reserves the right to declare the certification of the affected clients as terminated.</p>
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<b>Code</b>	INT-PRO-20-003_8
<b>Requirement (s)</b>	Clause 1.2
<b>Publication date</b>	18 June 2019
<b>There are two contradicting requirements in relation to who has to provide the previous audit report/ CAR information to the succeeding certification body in the case of a certificate transfer. The newer normative requirement, Clause 4.1.9 of FSC-STD-20-001 requires CBs to obtain the latest available FSC audit report from the applicant for consideration in the certification process, whereas the older normative requirement, Clause 1.2 of FSC-PRO-20-003 requires ASI to send information on previous CARs to the succeeding certification body upon request. Which requirement is applicable?</b>	
In this case the newer normative requirement applies, according to INT-STD-20-001_21. CBs are required to obtain the audit report/CAR information from the applicant.	

<b>Code</b>	INT-PRO-20-003_02 (also published under FSC-STD-20-011 with code INT-STD-20-011_08)
<b>Requirement (s)</b>	Clause 2.2
<b>Publication date</b>	19 May 2014
<b>How does the status of open minor nonconformities not evaluated within the 12 months timeframe affect the ability to transfer certificates to a new certification body?</b>	
Minor nonconformities not evaluated by the preceding certification body within the required 12-months timeframe do not automatically upgrade to majors. The certificate may still be transferred to the succeeding certification body but the pending minor nonconformities shall be evaluated in the transfer audit and then be upgraded if not closed.	

<b>Code</b>	INT-PRO-20-003_10
<b>Requirement (s)</b>	Clause 2.2 d)

<b>Publication date</b>	05 May 2022
<p><b>Clause 2.2 d) requires that FSC certificates cannot be transferred without making the relevant documentation about the certificate holder (records, history of CARs) available to the succeeding certification body. a) Are False Claim entries as per ADVICE-40-004-18 (V2-0) Clause 1.1.1 considered relevant documentation? b) How shall such information be provided to the succeeding certification body?</b></p> <p>a) Yes, it is considered relevant documentation;</p> <p>b) The preceding certification body shall keep all records regarding false claims in the certificate holder's entry in the FSC database.</p>	

<b>Code</b>	INT-PRO-20-003_05
<b>Requirement (s)</b>	Clause 3
<b>Publication date</b>	05 October 2015
<p><b>When an FSC FM certificate is transferred to another certification body at the re-evaluation audit stage and the re-issuance of a 5 years certificate is planned without any change in the license number, is it considered as a new certificate, and consequently is a peer review process requested?</b></p> <p>When an FSC FM active certificate is transferred to another CB in the year of the re-evaluation, the transfer audit shall be conducted in a way that satisfies the requirements for the re-evaluation, except for clause 7.2.b in FSC-STD-20-007. The succeeding CB is required to prepare a full, new certification report and public summary according to FSC-STD-20-007a and FSC-STD-20-007b.</p> <p>This applies unless the succeeding CB deems necessary to conduct the audit according to the requirements for a main evaluation.</p>	

<b>Code</b>	INT-PRO-20-003_07
<b>Requirement (s)</b>	Clause 3.2.e; 2.2
<b>Publication date</b>	14 December 2015
<p><b>Some succeeding Certification Bodies (CB) only communicate the transfer of a certificate to the preceding CB through the Automated Certificate Transfer tool in the FSC certificates database system.</b></p> <p>a) Can this tool replace the communication between CBs required in Clause 3.2.e?</p> <p>b) What reasons are legitimate for preceding CBs for not accepting a request to transfer a certificate?</p> <p>a) No, this tool is supporting the communication between CBs as per Clause 3.2.e but does not replace it. Previous communication shall happen.</p>	

b) A certificate cannot be transferred where any of the situations described in Clause 2.2 exists.

Clause 2.2.c covers the requirement of communication between CBs.

In addition, the only valid reason would be that the CH has not fulfilled all contractual obligations with the current CB.

<b>Code</b>	INT-PRO-20-003_01
<b>Requirement (s)</b>	Clause 3.2.f)
<b>Publication date</b>	19 February 2014

**We are transferring a FM certificate that will expire in May 2014 from another CB and we will perform the transfer audit (TA) and renewal audit (RA) at the same time before that date.**

**According to FSC-PRO-20-003 Clause 3.2, if the on-site transfer audit is conducted in a way that satisfies all the formal requirements for a main evaluation, a new 5-years certificate may be issued.**

**Should we consider this TA as a main evaluation or as a re-evaluation (same procedures as for the main evaluation with exceptions)?**

The transfer audit can be conducted as main evaluation or as re-evaluation, but only if conducted as main evaluation a new 5 years certificate can be issued.

INT-PRO-20-003_09	<b>As a transfer audit is supposed to be conducted according to the requirements for a surveillance evaluation, can this transfer audit also be postponed in accordance with FSC-DER-2020-001?</b>
Status	Withdrawn

<b>Code</b>	INT-PRO-20-003_11
<b>Requirement (s)</b>	FSC-PRO-20-003 V1-0, Clause 3.2.f FSC-DER-2022-003
<b>Publication date</b>	04 April 2022 Effective from the date of publication until 30 June 2023, or until invalidated prior to that date. This interpretation will be updated as necessary.

**As a transfer audit is supposed to be conducted according to the requirements for a surveillance evaluation, can this transfer audit also be postponed in accordance with FSC-DER-2022-003?**

**CoC** -Yes, the transfer audit can be postponed, but shall be conducted within six (6) months of the agreed transfer date. In case of medium risk, this timeline refers to the Stage 1 audit.

**FM** - Yes, the transfer audit can be postponed, but shall be conducted within six (6) months of the agreed transfer date.

<b>Code</b>	INT-PRO-20-003_06 (also published under FSC-STD-20-001 with code INT-STD-20-001_18)
<b>Requirement (s)</b>	Clause 5.1
<b>Publication date</b>	14 December 2015
<b>Clause 5.1 of FSC-PRO-20-003 requires the preceding certification body to remove all data from the certificate holder's entry in the FSC database that the certification body considers to be confidential. What happens with public summary reports when a certificate is transferred?</b>	
Public summary reports are not considered confidential per definition and shall therefore be kept in the FSC database of certificates to remain publicly available.	

## FSC-PRO-20-004 (V1-2) General Requirements for an FSC Training Programme

<b>Code</b>	INT-PRO-20-004_02
<b>Requirement (s)</b>	FSC-PRO-20-004 V1-2 Clauses 7.1 and 7.2
<b>Publication date</b>	06 September 2018
<b>May the online training on FSC Controlled Wood provided on the FSC e-training platform be considered sufficient to cover the CW part of the requirements for initial training of Chain of Custody auditors?</b>	
<b>FSC-PRO-20-004 V1-2 requires that all auditor candidates intending to qualify as auditor against FSC's CoC scope shall complete training on CoC. The contents of the training shall include, among others, CW in the context of CoC.</b>	
Yes, a certificate of successful completion of the online training on FSC Controlled Wood (see <a href="https://etraining.fsc.org">https://etraining.fsc.org</a> ) may be considered as covering the CW part of the initial auditor training on CoC.	

<b>Code</b>	INT-PRO-20-004_01
<b>Requirement (s)</b>	Clause 7.2
<b>Publication date</b>	15 March 2017
<b>Are all certification bodies (CBs) required to include controlled wood (CW) with regards to FSC-STD-30-010, FSC-STD-40-005 and corresponding accreditation requirements into their initial auditor training?</b>	
No, the following differentiation shall be applied:	
In the context of forest management certification (FM):	
Only CBs with FM CW in their accreditation scope are required to include CW according to FSC-STD-30-010 and FSC-STD-20-012 into their initial auditor training program.	
In the context of chain of custody certification (CoC):	
All CBs accredited for CoC shall ensure that the initial auditor training program for all CoC auditors includes general aspects of CW as covered by FSC-STD-40-004. This is to ensure that the qualified CoC auditors have sufficient awareness about the CW concept to audit aspects of CW in accordance with FSC-STD-40-004.	
CBs offering CoC CW certification to their clients shall additionally include FSC-STD-40-005 and corresponding requirements of FSC-STD-20-011 into their initial auditor training program for those auditors who are going to conduct CW CoC audits.	

# ADVICE NOTES

## ADVICE-20-001-12 (V2-0) Consequences of Uncontrollable or Non-auditable Risks Impacting the Forest Sector At Large

<b>Code</b>	INT-ADV-20-001-12_01
<b>Requirement (s)</b>	Clauses 5, 6 and 9
<b>Publication date</b>	07 April 2022 Effective from the date of publication until 30 June 2024, or until invalidated prior to that date. This interpretation will be updated as necessary.
<p><b>The Advice Note requires that the certification body shall inform relevant certificate holders about their upcoming suspension, withdrawal, or scope reduction within three (3) business days after having been notified by FSC about the declaration of extraordinary events and circumstances or the relevant 'specified risk' designations (Clause 5). Additionally, the certification body shall inform its certificate holders sourcing material from or outsourcing activities to organizations located within the geographical scope of the FSC Risk Assessment with relevant 'specified risk' designations five (5) business days after having been notified about the changes to risk designations (Clause 9).</b></p> <p><b>The distribution of the conflict zones in Ukraine is changing and new conflict zones are identified. What are the timelines for suspensions of the certificates and adaptation of the due diligence systems in the newly identified conflict zones?</b></p> <ol style="list-style-type: none"><li>1. The certification body shall inform relevant certificate holders about their upcoming suspension within three (3) business days after identifying a new conflict zone(s).</li><li>2. The certification body should monitor the sources of information provided in the FSC Risk Assessment for Ukraine on an at least bi-weekly basis.</li><li>3. The suspension shall become effective within 30 calendar days from the identification of the new conflict zone.</li><li>4. The certification body shall inform its certificate holders sourcing material from or outsourcing activities to organizations located within the geographical scope of the FSC Risk Assessment for Ukraine with relevant 'specified risk' designations within five (5) business days after identifying a new conflict zone(s) as follows:<ol style="list-style-type: none"><li>a. the certification body shall inform certificate holders sourcing forest-based material for the inclusion in FSC product groups about the upcoming suspension or withdrawal of relevant certificate holders and the mandatory adaptation timeline of changing their due diligence systems within 30 calendar days from identification of the new conflict zone;</li><li>b. the certification body shall inform certificate holders sourcing reclaimed material for the inclusion in FSC product groups (according to FSC-STD-40-007 V2-0,</li></ol></li></ol>	

clause 2.1) that they need to exclude relevant suppliers as part of their validation process within 30 calendar days from the identification of the new conflict zone.

c. the certification body shall inform certificate holders outsourcing activities within their certificate scope (according to FSC-STD-40-004 V3-0, clause 12.1 or FSC-STD-40-004 V3-1, clause 13.1) that they need to exclude relevant contractors from providing such activities within 30 calendar days from the identification of the new conflict zone.

<b>Code</b>	INT-ADV-20-001-12_02
<b>Requirement (s)</b>	Clauses 3 and 4
<b>Publication date</b>	<p>04 July 2022</p> <p>Effective from the date of publication until 30 June 2024, or until invalidated prior to that date. This interpretation will be updated as necessary.</p>

**In the case of Ukraine, which certificates shall be suspended or have their scopes reduced?**

FSC-ADV-20-001\_12 states that certificates that are within the geographical scope of the FSC risk assessment covered by relevant 'specified risk' designations shall be suspended. In the case of Ukraine, the relevant 'specified risk' designation is found in indicator 2.1.

The areas of risk are determined in the indicator's control measure, using three kinds of information sources: publicly available sources, State Forest Resource Agency of Ukraine (SFRA) or local authorities, and FSC accredited CBs or auditors.

One publicly available source that CBs shall use is the following map showing known and suspected locations of explosives in Ukraine: <https://mine.dsns.gov.ua/>

As this map is a publicly available information source, certificates shall be suspended for all or part (e.g., MUs, sites, group members) of the scope of certification when the CH is located within 100 m of any starburst presented on the map or when the CH is located, in whole or in part, within the "dangerous territories" (orange-highlighted areas).

Certificates outside the 'zones of armed conflict' on this map shall still be evaluated against the kinds of information sources found in the NRA's indicator 2.1 control measure verifier to ensure consistent application of FSC-ADV-20-001.

NOTE: The requirement to use this map is applied to reduce known inconsistencies in the identification of zones of armed conflict by CBs. This interpretation and this map do not introduce new required sources of information.



**FSC International – Policy and Performance Unit**

Adenauerallee 134

53113 Bonn

Germany

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

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

**Email :** [policy\\_performance@fsc.org](mailto:policy_performance@fsc.org)