Directive

FSC DIRECTIVE ON CHAIN OF CUSTODY EVALUATIONS

FSC-DIR-20-011 EN

1/04/2025

FSC FORESTS FOR ALL FOREVER™

Title:	FSC Directive on Chain of Custody Evaluations	
Dates:	**Last updated:**	1 April 2025
Timeframes:	**Transition period:**	not applicable
	Period of validity:	not applicable
Contact for comments:	FSC International – Policy & Performance Unit Adenauerallee 134 53113 Bonn Germany **Phone:** +49 -(0)228 -36766 -0 **Fax:** +49 -(0)228 -36766 -65 **Email**: psu@fsc.org	

Version control

Publication date:	1 April 2025

Version	Description	Date
V1-0	Not applicable	Not applicable

FOREWORD

FSC received various comments from certification bodies and stakeholders requesting a reduction in the number of normative documents to make the documented certification system more comprehensible. FSC therefore combined all previous advice notes related to a standard into single documents which are called “directive”. Where new advice notes are approved, these will be added to the directive and the revised document will be reissued.

The intention of this document is to standardize understanding and implementation of requirements by FSC accredited certification bodies.

This document will be revised as required. The content of the directive will be incorporated into the related standards in each major review as feasible.

Changes and amendments to the directive will be announced to stakeholders immediately.

Note on use of this directive

All aspects of this document are normative, including the scope, effective date, references, terms and definitions, tables, and annexes, unless otherwise stated.

CONTENTS

Code	Title	Status
ADVICE 20-011-01	**Evaluation of Minor Components Derogation Applications**	Withdrawn
ADVICE 20-011-02	**Ensuring organizations' compliance with newly effective standard requirements when resuming FSC business activity**	Withdrawn
ADVICE-20-011-03	**When shall an FSC Controlled Wood code be issued by the certification body?**	Withdrawn
ADVICE-20-011-04	**Field verification audits, results, decision making and required actions**	Withdrawn
ADVICE-20-011-05	**What is the sampling rate and pool that certification bodies shall use for field evaluations of supplies from sources with unspecified risk?**	Withdrawn
ADVICE-20-011-06	**What are examples of major non-compliances with the requirements of FSC-STD-40-005 V2-1?**	Withdrawn
ADVICE-20-011-07	**Can a Certification Body issue a certificate that gives exclusive rights of commercialization to the organization who had paid for the certificate?**	Withdrawn
ADVICE-20-011-08	**Can a manufacturer at the end of the chain possess a COC certificate covering the several links of the supply chain?**	Withdrawn
ADVICE-20-011-09	**Requirements for transition from version V2-1 to version V3-1 of the controlled wood standard FSC-STD-40-005**	Withdrawn
ADVICE-20-011-10	**Replacement of onsite audits by desk (remote) audits**	Valid
ADVICE-20-011-11	**Precautionary approach towards conflicting legislation and differing interpretations of laws and regulations**	Valid
ADVICE-20-011-12	**Remove option for waiving surveillance audits**	Valid

ADVICE-20-011-12 V2-0	Remove option for waiving surveillance audits	Valid
ADVICE-20-011-13	**Restrictions for certification related to Wood Charcoal in Ukraine for traders, for multi-site and group certification and outsourcing activities.**	Valid
ADVICE-20-011-14 V1-1	**Verification audits for material sold and produced but not dispatched prior to suspension (Amended)**	Valid
ADVICE-20-011-16	**Evaluation of contractors against the FSC core labour requirements**	Withdrawn
ADVICE-20-011-16 V2-0	**Evaluation of contractors against the FSC core labour requirements**	Valid
ADVICE-20-011-17	**Evaluation of FSC core labour requirements using FSC approved verification schemes**	Valid
ADVICE-20-011-18	**Confirmation of origin for FSC certified products from species of a particular risk to FSC´s integrity**	Valid
ADVICE-20-011-19	**Evaluation of the use of FSC-PRO-60-006b Risk Assessment Framework**	Valid
ADVICE-20-011-20	**Evaluation measures to apply in countries or regions with high integrity risk linked to the FSC Core Labour Requirements**	Valid

A. SCOPE

This document provides FSC's formal interpretation of the requirements included in FSC-STD-20-011.

B. REFERENCES

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

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

FSC-PRO-01-001	Development and Revision of FSC Normative Documents Procedure
FSC-STD-20-011	Chain of Custody Evaluations Standard
FSC-STD-40-004	Chain of Custody Certification Standard
FSC-STD-40-005	Requirements for Sourcing FSC Controlled Wood Standard

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:

Advice Note: errata or addenda to normative documents.

Change request: a documented and justified request from any stakeholder for adding, deleting or changing a requirement of an approved and valid FSC normative document.

Directives: compilations of Advice Notes.

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.

PART 1 General issues

1. The FSC Directive contains all advice notes related to a specific FSC international policy or standard that are collected into a single document for improved accessibility for certification bodies, certificate holders and other interested stakeholders. The FSC Directive provides clear advices on the implementation of FSC's international policies and standards.

1. If a certification body is in doubt about the correct implementation of an FSC normative document, the certification body must request clarification from the FSC Policy and Standards Unit. If required, such clarification will be provided in the form of a new advice note or standard interpretation.

2. Prior to the finalisation of an advice note, a certification body may make its own decision in relation to a question for which clarification has been sought. In such a case, responsibility for the consequences of the decision shall rest exclusively with the certification body concerned. Formal advice note subsequently provided by the FSC International Center will be applicable retrospectively.

3. The advices provided in this document represent the formal position of the FSC International Center unless and until it is superseded by the approval of a more recent policy, standard, or advice note. In such cases the requirements specified in the more recent document shall take precedence.

4. Certification bodies are required to comply with the most recent formal advice notes, and the Accreditation Services International will base its evaluations and issue of corrective actions on these.

5. Policy and Standards Director or the FSC Director General. If a certification body wishes to contest the advice provided it may do so by requesting a formal review and decision by the FSC Policy and Standard Committee. Until and unless such a review and decision has been finalised, the certification body shall continue to comply with the position of the FSC International Center.

6. Directives are under continual review and may be revised or withdrawn in response to new information, experience or changing circumstances, for example by the development of new policies or standards approved by the FSC Board of Directors.

PART 2 FSC Advice

ADVICE-20-011-01	Evaluation of Minor Components Derogation Applications
Status	Withdrawn

ADVICE-20-011-02	Ensuring organizations' compliance with newly effective standard requirements when resuming FSC business activity
Status	Withdrawn

ADVICE-20-011-03	When shall an FSC Controlled Wood code be issued by the certification body?
Status	Withdrawn

ADVICE-20-011-04	Field verification audits, results, decision making and required actions
Status	Withdrawn

ADVICE-20-011-05	What is the sampling rate and pool that certification bodies shall use for field evaluations of supplies from sources with unspecified risk?
Status	Withdrawn

ADVICE-20-011-06	What are examples of major non-compliances with the requirements of FSC-STD-40-005 V2-1?
Status	Withdrawn

ADVICE-20-011-07	Can a Certification Body issue a certificate that gives exclusive rights of commercialization to the organization who had paid for the certificate?
Status	Withdrawn

ADVICE-20-011-08	Can a manufacturer at the end of the chain possess a COC certificate covering the several links of the supply chain?
Status	Withdrawn

ADVICE-20-011-09	Requirements for transition from version V2-1 to version V3-1 of the controlled wood standard FSC-STD-40-005

Status	Withdrawn

ADVICE-20-011-10	**Replacement of onsite audits by desk (remote) audits**
Normative reference	FSC-STD-20-011 V4-2, Clause 2.6
Approval	21 June 2020
Effective date	22 June 2020
Background	FSC-STD-20-011 V4-1 Clause 2.6.e) specifies that certification bodies shall undertake physical inspection of all sites selected for evaluation, including inspection of all locations where operational activities under the scope of the certificate are carried out. It also specifies the circumstances in which desk (remote) audits can be undertaken. However, these circumstances do not include situations in which an on-site audit is not possible or viable due to the organization being located in a country or region with a demonstrated security risk for the life or health of auditors, or other events of *force majeure*. This Advice Note has the objective of specifying the requirements in such situations.
Advice	In situations where physical inspection of sites selected for evaluation is not possible or viable due to: 1. Demonstrated health and/or safety risk to auditors (demonstrated through verifiable public sources, e.g. official travel warnings or restrictions), or 2. travel restrictions imposed by organizational (certificate holder/ certification body) health and safety policies or public authorities, or 3. other demonstrated events of *force majeure*, the certification body may apply for derogation from PSU to replace an on-site audit by a desk audit. The application shall include: a. Certificate code of the company; b. Activities under the scope of the certificate (products and processes); c. Evidences of circumstances preventing the on-site audit (e.g. an official travel warning); d. Other additional information, as requested by FSC. Derogation applications will be evaluated on a case by case basis. NOTE: This Advice Note is not applicable in case of existing active derogations issued by FSC International for specific situations.

ADVICE-20-011-11	**Precautionary approach towards conflicting legislation and differing interpretations of laws and regulations**
Normative reference	FSC-STD-20-011 V4-2, Clause 6.20 FSC-STD-40-004 V3-1, Clause 6.1 FSC-STD-40-005 V3-1, Clause 4.3

Approval	1 October 2020
Effective date	1 November 2020
Background	FSC certified chain of custody organizations are required to conform to all applicable timber legislation. Clause 6.20 of FSC-STD-20-011 V4-0 addresses conflicts between legal requirements and adequate control measures, however it leaves the question open how to proceed for certification bodies in cases where there are conflicts between different laws and regulations or where different interpretations of one and the same law or regulation exist by public authorities. This advice note addresses these cases and will be incorporated into the next revised version FSC-STD-20-011 accordingly.
Advice	1. Certification bodies shall follow a precautionary approach in cases where there are: a) conflicting, contradictory or otherwise inconsistent requirements for certificate holders within or between applicable international, national or local laws, regulations and administrative requirements; b) differing interpretations of the above listed legal instruments by public authorities. 2. A precautionary approach towards these cases implies that: a) the more or most restrictive requirements shall be applied as constituting the relevant legal basis; b) the more or most rigorous interpretation by public authorities shall be used to determine the practical implementation of relevant requirements. 3. Certification bodies shall have a procedure for using the precautionary approach by identifying relevant conflicts in consultation with the relevant FSC Network Partners. 4. In above cases where the most restrictive requirements or most rigorous interpretation cannot be determined, the certification body shall seek clarification through a formal interpretation by the FSC Performance and Standards Unit, following *PSU-PRO-10-201 Enquiry Procedure*.

ADVICE-20-011-12	**Remove option for waiving surveillance audits**
Normative reference	FSC-STD-20-011 V4-2, Clause 3.3
Approval	14 December 2020
Effective date	16 December 2020 until withdrawn
Background	FSC-STD-20-011 V4-1 Clause 3.3 permits certification bodies to waive a surveillance evaluation for an operation or site that did not perform activities under the scope of the CoC certificate. However, integrity investigations by FSC and ASI have discovered that some organizations are taking undue advantage of this provision. This Advice Note is intended to address this risk.

Advice	Certification bodies shall not waive the surveillance evaluation for an operation or site that did not perform activities under the scope of the CoC certificate (e.g., did not produce, label, or sell any FSC-certified material and did not source controlled material or sell any FSC Controlled Wood since the previous audit) in high-risk supply chains as defined by FSC. This Advice Note will be updated as necessary.

ADVICE-20-011-12 V2-0	**Remove option for waiving surveillance audits**
Normative reference	FSC-STD-20-011 V4-2, Clause 3.2 and 3.3
Approval date	14 December 2020, amended 17 02 2025
Effective date	16 December 2020, amended 01 07 2025
Scope	This advice note applies to all accredited certification bodies auditing Chain of Custody (CoC) certificate holders operating in supply chains with designated high integrity risk in Annex I.
Background	FSC-STD-20-011 V4-2 Clause 3.3 permits certification bodies to waive a surveillance evaluation for an operation or site that did not perform activities under the scope of the CoC certificate. However, integrity investigations by FSC and Assurance Services International (ASI) have discovered that some organizations are taking undue advantage of this provision. This Advice Note is intended to address the risk(s) identified in the affected supply chains, by removing the option to waive evaluations for supply chains with 'high integrity risk'. Detail, including but not limited to geographical location, product type, species sourced, and business activity, for each 'high integrity risk' supply chain is provided in Table 1 in Annex I, with additional information on the date applicable from, when it is added after the publication of the revised advice note (V2-0). It is the prerogative of FSC to make any change to this Annex, and any change, including the rationale for the change, will be communicated directly to the affected stakeholders (certification bodies) via email, including the regular certification body forum mailing, and signposted on the relevant FSC website page to inform all stakeholders, with this advice note updated accordingly and made available in the official FSC languages on FSC Connect in <FSC-DIR-20-011 *Directive on Chain of Custody Evaluations*>.
Terms and definitions	**Integrity risk** Likelihood and/or severity of an incident(s) that affects FSC's integrity. NOTE: The term 'incident' can also be considered as an 'event', with reference to the definition in ISO 3100:2009. **High integrity risk** A conclusion by FSC, following a risk assessment, that the likelihood and/or severity of an incident(s) affecting FSC's integrity and credibility is high.

<table>
<tr><td></td><td></td></tr>
<tr><td>Advice</td><td>1. The certification body shall not waive any surveillance evaluation for any client operating in supply chains identified by FSC as high integrity risk, and included in Table I of Annex I of this advice note, with an ‘active’ risk status.</td></tr>
<tr><td>Annex I</td><td>This annex lists the designated ‘high integrity risk’ supply chains in Table 1 to which the certification body shall apply the requirements of this advice note.

Table 1 provides the information on any supply chains (Risk ID) considered as ‘high integrity risk’ by FSC for the purposes of this advice note, including, but not limited to:
a) Geographical location of certificate holders;
b) Product type according to the FSC Classification;
c) Species common and scientific name;
d) Business activity of affected certificate holder.

Table 1: Identified ‘High-Integrity Risk’ Supply Chains

<table>
<tr><th>Risk ID.</th><th>Geographical Location</th><th>Supply Chain Detail</th><th>Risk Status</th><th>Applicable from</th><th>Date of Change</th><th>Affected Clients</th></tr>
<tr><td>1.</td><td>China (mainland)</td><td>Product Group: W5</td><td>Active</td><td>01 July 2025</td><td>n/a</td><td>Located in China (mainland) with product group W5 in scope</td></tr>
<tr><td>2.</td><td>China (mainland)</td><td>Product Group: W7</td><td>Active</td><td>01 July 2025</td><td>n/a</td><td>Located in China (mainland) with product group W7 in scope</td></tr>
<tr><td>3.</td><td>China (mainland)</td><td>Product Group: W8</td><td>Active</td><td>01 July 2025</td><td>n/a</td><td>Located in China (mainland) with product group W8 in scope</td></tr>
<tr><td>4.</td><td>China (mainland)</td><td>Species: Bamboo (Phyllostachys spp.)</td><td>Active</td><td>01 July 2025</td><td>n/a</td><td>Located in China (mainland) with Bamboo species in scope.</td></tr>
</table>

NOTE 1: One (1) table row indicates one (1) supply chain, with column ‘Affected Clients’ outlining which clients are affected. The ‘Applicable from’ column provides the date of applicability and the ‘Status’ column includes ‘Active’ or ‘Expired’.

NOTE 2: On review, FSC may remove the need for the requirement in Clause 1 of this advice note, with this signalled in the ‘Status’. If the Status is amended from ‘Active’ to ‘Expired’, the advice note is no longer applicable to the affected clients, effective</td></tr>
</table>

	immediately, with the 'Date of Change' recorded for reference.

ADVICE-20-011-13	**Restrictions for certification related to Wood Charcoal in Ukraine for traders, for multi-site and group certification and outsourcing activities.**
Normative reference	FSC-STD-20-001 V4-0, Clauses 1.4.1, 1.4.6 FSC-STD-20-011 V4-2, Clauses 7.3, 7.4, 9.2, 9.4 FSC-STD-40-004 V3-0, Clauses 13.1, 13.3, 16.2
Scope	Certification bodies operating in Ukraine. Certificate holders operating in Ukraine with W2 Wood Charcoal in their certificate scope.
Approval	14 December 2020
Effective date	16 December 2020 until withdrawn
Terms & Definitions	**Trader:** A person or legal entity that buys and sells wood and/or non-timber forest products and who takes legal possession of the goods. Traders do not conduct any transformation of these products, either directly or through outsourcing.
Background	Since 2016, four charcoal transaction verification loops and follow-up investigations indicated a significant integrity risk in wood charcoal supply chains in Ukraine. This resulted in suspension, termination, and blockage from the FSC system for more than 30 organizations that were either certificate holders or part of a Multi-site or Group COC certificate. The analysis of fraud scenarios in Ukrainian charcoal supply chains confirms that most of the risk is present at the level of traders and outsourcing of W2 Wood Charcoal related activities. This Advice Note is intended to mitigate the risk of false claims related to *W2 Wood Charcoal* originating from Ukraine in global FSC supply chains.
Advice	1. Unless applying additional due diligence as stipulated by Clause 2 of this Advice note, certification bodies in Ukraine accredited for CoC certification shall: i. not grant FSC CoC certification to traders applying for certification of product type *W2 Wood Charcoal*; ii. not grant scope extension to FSC-certified traders for product type *W2 Wood Charcoal*;

	iii. classify all outsourcing activities related to processing, storage or labelling of product type Wood Charcoal in Ukraine as 'high risk' and conduct on-site audits at each sub-contractor's facility; iv. approve the inclusion of a new member with product type *W2 Wood Charcoal* in the certificate scope of a Multi-site or Group COC certificate only after an on-site audit; v. undertake annual surveillance audits of certificate holders in Ukraine with *W2 Wood Charcoal* included in the scope of certification as unannounced or short notice audits. 2. The only exception to clause 1 (i-v) above is for certification bodies to apply additional due diligence and evaluation of risks associated with the given organizations prior to certifying applicants, granting scope extensions, or approving outsourcing to non-FSC COC-certified sub-contractors in Ukraine. NOTE: For the development of additional due diligence requirements, certification bodies can use the draft guideline "Integrity risk assessment requirements for certification bodies for FSC application review" developed by FSC International (available on the FSC Ukraine website) and additional comments to the document developed by FSC Ukraine for the field test in Ukraine and China in 2020. 3. Certificate holders registered or operating in Ukraine and purchasing, producing or trading with *W2 Wood Charcoal* shall: i. add a new member to a Multi-site or Group COC certificate only after an on-site audit of the applicant by the certification body; ii. not undertake outsourcing activities related to processing, storage, labelling of product type *W2 Wood Charcoal* to a non-FSC COC-certified sub-contractor, unless their certification body implements Clause 2; iii. outsource activities related to processing, storage, labelling of product type *W2 Wood Charcoal* to an FSC COC-certified contractor only after an on-site audit at a sub-contractor's facility is conducted by the certificate holder's CB. This Advice Note will be updated as necessary.

ADVICE-20-011-14 V1-1	**Verification audits for material sold and produced but not dispatched prior to suspension (Amended)**
Normative reference	FSC-STD-20-011 V4-2, Clause 3.7 c) FSC-STD-20-011 V4-2, Section E, 'Scope of a chain of custody certificate'
Scope	This advice note applies to all certification bodies accredited for FM/CoC or CoC certification in Russia.
Approval	FSC Director General, 18 March 2022 Amended: 30 March 2022
Effective date	18 March 2022

	Amended: 30 March 2022
Background	In general, products which have not yet left an organization's chain of custody system at the time the certificate is invalidated have lost their certified status. This advice note has been issued to account for the extraordinary circumstances that requires the suspension of all FM/CoC and CoC certificates in Russia due to uncontrollable and forest sector wide risks as identified by the revised National Risk Assessment for Russia (FSC-NRA-RU V3-0) and as regulated via Advice Note FSC-ADV-20-001-12. It provides for the option of certificate holders prior to their suspension to undergo an extraordinary audit by which the certified and controlled product stock for delivery and related sales invoices can be inventoried. This will allow CoC certified buyers outside Russia, upon issuance of relevant verification statements by the certification body, to use relevant material as certified or controlled input in case that the dispatch of relevant invoiced stock is not possible before the suspension date.
Advice	1. Upon request of the organization, the certification body may conduct an audit to verify the existence of certified and controlled product stock at the time of suspension which has been sold (invoiced) with FSC claims prior to the organization's suspension and which will not undergo any further transformation by the organization prior to its intended delivery. NOTE: The verification audit may be conducted after the suspension, based on a risk analysis whether the existing evidence is sufficient to verify the above beyond a reasonable doubt. 2. If the certification body can verify that relevant invoiced material is held in stock for delivery and that the total amount of invoiced material does not exceed the total stock held for delivery, then the certification body may issue a confirmation statement to the receiving organization that the material has been duly produced prior to the time of suspension and can be considered / used as eligible input according to the invoice claim despite its dispatch only after the suspension date of the supplying organization’s certificate.

ADVICE-20-011-16	**Evaluation of contractors against the FSC core labour requirements**
Status	Withdrawn

ADVICE-20-011-16 V2-0	**Evaluation of contractors against the FSC core labour requirements**
Normative reference	FSC-STD-20-011 V4-2: - Section 9 - Clause 11.3
Approval date	19 July 2024
Effective date	1 November 2024

Transition end date	31 December 2025
Scope	This advice note applies to all certification bodies auditing Chain of Custody (CoC) certificate holders and CoC applicants that outsource activities within the scope of their certification to non-FSC-CoC-certified contractors.
Terms and Definitions	**Audit:** systematic, independent, and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled. (Source: ISO 19011:2018) **Contractor:** Individual, company, or other legal entity contracted by an organization for any activities under the scope of an FSC CoC certificate. (Source: FSC-STD-40-004 V3-1) **Documentation review:** Refers to an assessment of certain documentation by an auditor, conducted either on-site or off-site. **First-party audit**: an assessment that is performed within the organization by their own auditing resource (i.e., internal audit). NOTE: In the context of this advice note, the audit would be carried out by, for example, an employee of the contractor or a consultant contracted by the contractor. (Source: ISO 19011:2018) **FSC approved verification schemes:** Third-party verification schemes recognized as partially or fully equivalent to the requirements entailed under FSC core labour requirements in <FSC-STD-40-004 V3-1 Chain of Custody Certification> and <FSC-STD-20-011 V4-2 Chain of Custody Evaluations>, based on <PSU-PRO-10-003 V1-1 Procedure for equivalence assessment of verification schemes against the FSC core labour requirements>. (Source: FSC-ADVICE-40-004-24) **Organization:** The person or entity holding or applying for certification and therefore responsible for demonstrating conformity to the applicable requirements upon which FSC certification is based. (Source: FSC-STD-40-004 V3-1) **Second-party audit**: an assessment that is performed by a person or organization that has an interest in the object of the assessment. NOTE: In the context of this advice note, the audit of the contractor would be carried out by, for example, the organization, or a person contracted by the organization who is independent of the contractor. **Third-party audit:** an assessment that is performed by a person or organization independent to the object of the assessment. NOTE: In the context of this advice note, the audit would be carried out by a person acting on behalf of a certification body contracted by the organization, for purposes that are not an FSC evaluation.
Background	FSC introduced <FSC-ADVICE-20-011-16 V1-0 Evaluation of Contractors against FSC Core Labour Requirements> to provide clear instructions to certification bodies on how contractors operating under outsourcing agreements with CoC certificate holders have to be assessed against the FSC core labour requirements.

	Since its effective date, various stakeholder concerns on the practical implications were raised with FSC, with multiple queries for FSC to provide further clarity and request for more time to implement requirements. This request resulted in the introduction of the 'transition end date' from 1st September 2023, which provided the transition end date until 31st December 2024. Despite some positive feedback appreciative of the provision of more time, ongoing concerns on the impact of the advice note on certificate holders and certification bodies were raised, especially concerning the risk classification requirements and use of the International Trade Union Confederation's (ITUC) Global Rights Index. Various stakeholders requested FSC to withdraw, suspend, or revise the requirements in a timely manner. The objective of this revised advice note is to respond to stakeholder concerns in an expediate manner and ensure the original intention of the advice note – providing clear instructions on how the FSC core labour requirements have to be applied to contractors operating under outsourcing agreements - is retained. To achieve this, the advice note provides further amendments and clarifications based on received stakeholder queries. The advice note outlines how certification bodies shall risk assess contractors, those operating under outsourcing agreements, and the requirements for evaluation, dependent on the associated risk level. These amendments and added clarifications are relevant to certification bodies.
Advice	**1. Evaluation of contractors operating under outsourcing agreements' conformity to the FSC core labour requirements** 1.1 The certification body shall conduct a risk assessment of organization's control over its non-FSC-certified contractors' conformity to the FSC core labour requirements. NOTE 1: This risk assessment is in addition to the requirement for risk assessment for risk associated with mixing, substitution, or false claims as provided in Section 9 of FSC-STD-20-011 V4-2 Chain of Custody Evaluations. NOTE 2: Contractors who are certified by a FSC approved verification scheme are exempt from certification bodies' risk assessments. Any observations or complaints about potential non-conformities should be shared with responsible certification bodies and verification scheme owners. 1.2 An outsourcing agreement with a non-FSC-certified contractor shall be automatically classified as 'high risk' if either of the following are true, and clause 3 shall apply accordingly: a) there are substantiated complaints regarding the contractor's conformity to the FSC core labour requirements since the last surveillance audit of the organization; **AND/OR** b) the previous FSC evaluation of the organization has resulted in any non-conformities in regard to the contractor's conformity with the FSC core labour requirements. 1.3 An outsourcing agreement with a non-FSC-certified contractor that does not meet clause 1.2, may be considered 'low risk' if either of the following are true:

a) the previous FSC evaluation of the contractor was conducted on-site, which resulted in no non-conformities in regard to the contractor's conformity with FSC core labour requirements; **OR**

b) there has been a first-/second-/third-party on-site audit of the contractor, and all the following criteria are met:
   i. the audit demonstrates conformance to FSC CLR; **AND**
   ii. the audit is conducted at least annually; **AND**
   iii. audit findings are made available for review by the certification body; **AND**
   iv. the audit includes worker interviews.

NOTE: "Annually" is to be interpreted as follows: at least once per calendar year, but no later than 15 months after the last first-/second-/third-party audit (determined by the date of the on-site visit).

1.4 For an outsourcing agreement with a non-FSC contractor~~s~~ which does not meet the criteria for 'low risk' in clause 1.3, the certification body shall determine whether there are any other verifiable aspects that would justify their classification as 'low risk', otherwise the contractor shall be classified as 'high risk', and clause 3 of this advice note shall apply.

NOTE: Examples of other verifiable aspects are provided in Annex I of this advice note.

2. Evaluations of 'low risk' outsourcing agreements

2.1 For outsourcing agreements classified as 'low risk' related to conformity to FSC core labour requirements, the certification body shall conduct at least a documentation review of the contractor's conformity.

2.2 A documentation review shall cover at minimum verification of the organization's conformity to clauses 1.1 and 1.2 in <FSC-ADVICE-40-004-23 Evaluation of contractors against the FSC core labour requirements> to identify any changes regarding the contractor's commitment to and conformity with the FSC core labour requirements (e.g., the existence of complaints).

3. Evaluations of 'high risk' outsourcing agreements

3.1 For outsourcing agreements classified as 'high risk' related to conformity to FSC core labour requirements, the certification body shall conduct an on-site audit of the contractor.

NOTE: When 'high risk contractors' are located in different countries, the certification body may contract the following third parties to complete the audit:
   i. an FSC-accredited certification body; or
   ii. a certification body accredited to a FSC approved verification scheme.

3.2 On-site audits shall include, in addition to the organization's conformity to clauses 1.1 and 1.2 in <FSC-ADVICE-40-004-23 Evaluation of contractors against the FSC core labour requirements>, interviews with personnel and site observations.

4. Sampling of contractors

	4.1 If more than one outsourcing agreement is identified as low risk, a sampling of relevant contractors according to Clause 9.6 of <FSC-STD-20-011 V4-2 Chain of Custody Evaluations>, can be applied. NOTE: The sample used for low risk is separate from the sample pool used for high-risk scenarios. 4.2 If more than one outsourcing agreement is identified as high risk, a sampling of relevant contractors according to Clause 9.6 of <FSC-STD-20-011 V4-2 Chain of Custody Evaluations>, can be applied. NOTE: If the organization wants to include new high-risk outsourcing agreements in its certificate scope in the period between the certification body evaluations, Clause 9.5 of <FSC-STD-20-011 V4-2 Chain of Custody Evaluations>, applies accordingly. 4.3 The certification body may add relevant contractors to the pool of contractors identified as having high-risk situations with respect to mixing different input materials and take a sample from the overall resulting pool. In this case, the sample shall be structured in such a way that it results in a balanced coverage of the two risk scenarios. NOTE: For group and multisite certificates, the calculation of the contractor sample shall be conducted at the participating-site level.
Annex I	**Examples** As provided in clause 1.4, other verifiable aspects that may be considered to justify a 'low risk' classification for an outsourcing agreement with a non-FSC-certified contractor may include, but are not limited to, reference to: 1. FSC Controlled Wood National Risk Assessments (Controlled Wood NRA)[1] 2. Corruption Perceptions Index (CPI)[2] 3. International Trade Union Confederation (ITUC) Global Rights Index[3] 4. Labour Rights Index (LRI)[4] Any reference to the FSC CWNRA or indices provided should reference the most up-to-date version available at the time of use. Any use of reference to country indices should refer to the country a contractor is operating in to provide activities in scope of <FSC-STD-40-004 V3-1 Chain of Custody Certification>. **FSC Controlled Wood NRA** For contractors in countries where there exists an applicable FSC Controlled Wood National Risk Assessment (CWNRA), this index should be used at first instance, with reference to Indicator 2.2 'Labour Rights'. For justification of 'low risk', a Controlled Wood NRA rating of 'Low' is sufficient. **CPI** Reference to the CPI, for the purposes of justification of a 'low risk' classification, should reference countries with rating of greater or equal to 50 (≥50). **ITUC** Reference to the ITUC's Global Rights Index, for the purposes of a 'low risk' classification, should reference countries with a rating of 2 or less (≤2). **LRI** Reference to LRI, for the purposes of justification of a 'low risk' classification, the scores and ratings reference countries with a rating of 70.5 or above (≥70.5).

	NOTE: This threshold indicates countries with ‘reasonable access to decent work’ or above, according to the index.

ADVICE-20-011-17	**Evaluation of FSC core labour requirements using FSC approved verification schemes**
Normative reference	FSC-STD-40-004 V3-1 Chain of Custody Certification - Clause 1.6 - Clause 1.11 - Section 7 - Annex D: ‘FSC core labour requirements self-assessment’ FSC-STD-20-011 V4-2 Chain of Custody Evaluations - Section 11 - Section 12 PSU-PRO-10-003 V1-1 EN Procedure for equivalence assessment of verification schemes against the FSC core labour requirements
Approval date	11 April 2023
Effective date	01 July 2023
Scope	This Advice Note is applicable to certification bodies and certificate holders specifying actions to follow when using FSC approved verification schemes in conformity with FSC core labour requirements.
Background	Clause 1.11 of <FSC-STD-40-004 V3-1 Chain of Custody Certification>, states that “The organization may demonstrate compliance with other certification schemes as evidence of conformity to Section 7 FSC core labour requirements.” Section 11 of <FSC-STD-20-011 V4-2 Chain of Custody Evaluations>, provides requirements for certification bodies to evaluate FSC core labour requirements. <PSU-PRO10-003 V1-1 Procedure for equivalence assessment of verification schemes against the FSC core labour requirements> provides a clear and transparent methodology for identifying, benchmarking, assessing, and approving verification scheme that can demonstrate conformity with the FSC core labour requirements in <FSC-STD-40-004 V3-1 Chain of Custody Certification>. The objective of this Advice Note is to provide instructions for using FSC approved verification schemes in evaluations of the FSC core labour requirements. This also aims to ease the verification of FSC core labour requirements by leveraging other verification schemes.
Terms and definitions	**FSC approved verification schemes:** Third party verification schemes recognized as partially or fully equivalent to the requirements entailed under FSC core labour requirements in <FSC-STD-40-004 V3-1 Chain of Custody Certification> and <FSC-STD-20-011 V4-2 Chain of Custody Evaluations>,

	based on <PSU-PRO-10-003 V1-1 Procedure for equivalence assessment of verification schemes against the FSC core labour requirements>. **Verification schemes:** Voluntary sustainability standards (VSS), national and regional regulatory mechanisms, corporate practices, internal procurement policies and sustainability initiatives.
Advice	Section 1: Certificate holder requirements 1.1 The organization may use an FSC approved verification scheme to demonstrate conformity with the FSC core labour requirements. NOTE: FSC approved verification schemes are listed in the final section of this Advice Note. 1.2 The organization using an FSC approved verification scheme according to this Advice Note may be exempted from implementing Clause 1.6 of <FSC-STD-40-004 V3-1 Chain of Custody Certification>. 1.3 The organization shall make available all records related to the FSC approved verification scheme such as audit reports, certificates, corrective action requests, non-conformities, etc., to the certification body. 1.4 The organization shall inform the certification body of any update or change in the status of its attestation of conformity by the FSC approved verification scheme. Section 2: Certification body requirements 2.1 The certification body may waive the requirements in Clause 11.3 of <FSC-STD-20-011 V4-2 Chain of Custody Evaluations>, if the following requirements are met: a) the FSC approved verification scheme is valid at the time of the FSC evaluation; and b) the authenticity of the attestation of conformity by the FSC approved verification scheme has been verified against a publicly available database published by the verification scheme's owner or its assurance provider. 2.2 The certification body shall document the findings and conclusions from applying this Advice Note in the evaluation report under 'evaluation findings' as per Section 12 'Reporting requirements' of <FSC-STD-20-011 V4-2 Chain of Custody Evaluations>. 2.3 The certification body shall record any changes in the status of attestation of conformity as per Clause 1.4 of this advice and take appropriate actions in accordance with <FSC-STD-20-011 V4-2 Chain of Custody Evaluations>.
FSC approved verification schemes	**Certification Schemes:** 1. SA8000:2014

ADVICE-20-011-18	**Confirmation of origin for FSC certified products from species of a particular risk to FSC´s integrity**
Normative reference	FSC-STD-40-004 V3-1, - Clause 2.1 - Clause 2.2 - Clause 2.4 - Clause 5.1 - Clause 8.3 c); FSC-STD-20-011 V4-2 - Clauses 2.2 a) - Section 12, Table B
Scope	This Advice Note applies to all CoC-certified and applicant organizations sourcing FSC-certified material or trading products made with species of a particular risk to FSC's integrity and carrying an FSC claim (see Annex I). The Advice Note is also applicable to all organizations that have FSC-certified material in stock and products manufactured from pre-existing FSC-certified raw material stocks. This Advice Note does not apply to the CoC-certified organizations dealing with controlled material / FSC Controlled Wood verified through a due diligence system as specified in <FSC-STD-40-005 V3-1 Requirements for Sourcing FSC Controlled Wood>. This Advice Note also applies to FSC-accredited certification bodies (CBs) responsible for evaluating CoC-certified organizations under the aforementioned condition.
Approval date	18 September 2023
Effective date	01 January 2024
Transition end date	01 April 2024
Background	In 2019 FSC commissioned ASI to undertake a Transaction Verification for FSC certified Paulownia products traded in 2018 and 2019. The Transaction Verification investigation was concluded in 2020 and revealed systematic violations of certification requirements by organizations that were trading non-certified *Paulownia* products as certified in absence of any sales of *Paulownia* from FSC forest management units. In order to ensure FSC's system integrity, in 2021 FSC introduced an Advice Note ADVICE-40-004-20 on Confirmation of origin for FSC certified *Paulownia* products. A year later, in 2022, the second Transaction Verification investigation for *Paulownia* products was launched by FSC and ASI to check besides other issues and the effectiveness of the Advice Note. No critical violations were identified and therefore the Advice Note proved

	to be a functional working tool to secure integrity of FSC certified *Paulownia* supply chains. A Transaction Verification on *Mangifera* and *Dalbergia* launched by FSC and ASI in 2022 showed a similar situation like *Paulownia* in FSC certified supply chains of *Mangifera* and *Dalbergia*, where a limited capacity of FSC certified forest management units could not be compatible with the volumes claimed in supply chains. Considering the effectiveness of the Advice Note ADVICE-40-004-20 on Confirmation of origin for FSC certified *Paulownia* products and with the intention of responding in an expedite manner to the risk of introduction of ineligible inputs of *Mangifera* and *Dalbergia* or any other species of a particular risk of integrity that FSC identifies via Transaction Verification or other investigations, FSC decides to take precautionary measures by expanding the scope of the ADVICE-40-004-20, as defined here below. Relevant species are identified by FSC after the conclusion of Transaction Verification or other investigations, where there is reasonable and convincing evidence that the trade in these species raises critical integrity risks for FSC.
Advice	<u>Section 1: Certificate holder requirements</u> 1.1. The organization shall not include species of a particular risk to FSC's integrity in their product group list, not accept relevant material as certified input into their certified product groups, nor label or sell products containing such material with an FSC claim unless the organization can trace the material to its forest management unit of origin through objective evidence. 1.2. The organization that uses material from species of a particular risk based on Clause 1.1 above shall ensure that the full species information is recorded in the product groups list (and not only the genus). 1.3. The organisation shall review and, if necessary, revise the product group list after a new species is added to Annex I. <u>Section 2: Certification body requirements</u> 2.1. The certification body shall verify the accuracy and plausibility of the supplier documentation tracing the material back to the forest management unit of origin. This verification shall be undertaken at a minimum during the annual evaluations. 2.2. If the certification body comes to the conclusion that the supplier documentation is insufficient to clearly trace the material to the forest management unit of origin, the certification body shall inform FSC and ASI of the suspicion of false claim and share the relevant information. 2.3. The certification body shall assess the organization's certification scope to include the species details and update the FSC database accordingly in case only the genus has been recorded. NOTE 1: FSC will update Annex I based on the conclusions of Transaction Verification or other investigations as deemed necessary.

	NOTE 2: In case that only the genus is listed, it applies to all species within this genus.
Annex I	This annex lists the species of a particular risk to FSC's integrity to which this advice note applies. • *Dalbergia latifolia* • *Dalbergia scleroxylon* • *Dalbergia sissoo* • *Mangifera indica* • *Paulownia spp.*

ADVICE-20-011-19	**Evaluation of the use of FSC-PRO-60-006b Risk Assessment Framework**
Normative reference	FSC-STD-20-011 V4-2: - Section 13 ADVICE-40-005-27
Approval date	06 June 2024 by the FSC Board of Directors Amended on 01 April 2025
Effective date	01 October 2024 For organizations implementing <FSC-STD-20-011r V1-0 FSC Regulatory Module – Chain of Custody Certification>: 01 July 2025
Transition end date	31 December 2025 Not applicable for the organizations implementing FSC Regulatory Module.
Scope	This advice note applies to the certification body evaluating the organization sourcing controlled material under <FSC-STD-40-005 Requirements for Sourcing FSC Controlled Wood>.
Terms and Definitions	**Mitigation Measure:** An action that the organization shall take to mitigate the risk of sourcing material from unacceptable sources. NOTE: FSC is replacing the term 'control measure' with 'mitigation measure'. The term "control measure" used in the FSC Risk Assessments developed according to <FSC-PRO-60-002a FSC National Risk Assessment Framework> is equal to term "mitigation measures" introduced in this Advice Note, and used in the FSC Risk Assessments developed according to <FSC-PRO-60-006b Risk Assessment Framework>. **Negligible risk:** A conclusion, following a risk assessment, that there is no cause for concern either that material from a specific geographic area originates from unacceptable sources, or that material is mixed with non-eligible inputs or material with a different origin in such a way that would not allow the level of risk related to origin to be confirmed as negligible.

	NOTE: FSC is replacing the term 'low risk' with 'negligible risk'. The term 'low risk' was used in <FSC-PRO-60-002a FSC National Risk Assessment Framework>. **Negligible risk area:** A negligible risk area refers to an area where the level of risk of sourcing material is assessed as negligible through the risk assessment described in <FSC-PRO-60-006b Risk Assessment Framework>. **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. NOTE: FSC is replacing the term 'specified risk' with 'non-negligible risk'. The term 'low risk' was used in <FSC-PRO-60-002a FSC National Risk Assessment Framework>. **Non-negligible risk area**: A non-negligible risk area refers to an area where the level of risk of sourcing material is assessed as non-negligible through the risk assessment described in <FSC-PRO-60-006b Risk Assessment Framework>. **Unassessed area:** An area that is not covered by a risk assessment. NOTE: The terms and definitions are used for the purpose of this advice note only.
Abbreviations	**EUDR:** Regulation (European Union) 2023/1115 on deforestation-free products **DDS:** Due Diligence System **RA:** Risk Assessment
Background	FSC has developed this advice note to implement the alignment with the <FSC-POL-01-007 Policy to Address Conversion> in the controlled wood standard and to ensure the integrity of the FSC system during the transition to the revised <FSC-PRO-60-006b Risk Assessment Framework>, and the introduction of the FSC Regulatory Module [which is a voluntary add-on standard to support FSC certificate holders in their efforts to comply with Regulation (European Union) 2023/1115 on deforestation-free products (EUDR)].
Advice	The certification body shall use the terms "negligible risk" instead of "low risk", "non-negligible risk" instead of "specified risk", and "mitigation measure" instead of "control measure" in the evaluation report and the public certification summary in accordance with Section 13 of <FSC-STD-20-011 Chain of Custody Evaluations>.

ADVICE-20-011-20	Evaluation measures to apply in countries or regions with high integrity risk linked to the FSC Core Labour Requirements
Normative reference	FSC-STD-20-001 V4-0: Clauses 1.2.3 d), 2.2.5 c), 2.4.1 g), 4.7.1, Annex 3 FSC-STD-20-011 V4-2: Clauses 2.2 a), 2.6 b), 3.2, 3.3, 12.1, Section 11
Approval date	30 October 2024
Effective date	01 January 2025
Scope	This Advice Note is applicable to all FSC accredited certification bodies (CB) with clients operating in the areas listed in Annex I.
Background	This advice note sets out normative provisions to strengthen the evaluation requirements for situations considered as posing 'high integrity risk' linked to the FSC core labour requirements, following FSC's assessment. It follows the style of an existing advice note, which focuses on high-risk species (<ADVICE-40-004-20 *Confirmation of origin for FSC certified products from species of a particular risk to FSC's integrity*>), which have been identified by FSC after conclusion of Transaction Verification or other investigations. Similarly, for this advice note, the risk classification of 'high integrity risk' results from FSC investigation into member and stakeholder concerns. In the case of Myanmar, as a result of concerns by FSC International, as well as its members and stakeholders, in relation to potential violations of labour rights, assessments were carried out by Assurance Services International (ASI). The resulting report provided recommendations to FSC International to strengthen measures to evaluate the FSC core labour requirements (CLR) for clients there. The FSC Board mandated the FSC Secretariat to introduce normative changes based on these recommendations through use of an accelerated process. Therefore, Myanmar is the first country referenced in Annex I, with the potential for others to be added subsequently, on a case-by-case basis. Any additions to Annex I are the result of decisions taken by FSC following assessment, and these will consider relevant stakeholder concerns. The reporting to ASI provided in this advice note is for the purposes of intelligence gathering only.
Terms and definitions	**High integrity risk:** A conclusion by FSC, following a risk assessment, that a country/region, a supply chain or certain certificate holders operate in an environment where existing conditions prevent a certification body from detecting nonconformities. **Unannounced evaluation:** Surveillance evaluation or part of a surveillance evaluation that is conducted without prior notice of date and time of the evaluation to the client.

Advice	**1. Measures for the evaluation of chain of custody certified organizations operating in areas with a designation of 'high integrity risk' provided in Annex I** 1.1. The certification body shall not waive any surveillance evaluation for an organization's operation or site that did not perform activities under the scope of the CoC certificate (e.g. did not produce, label, or sell any FSC-certified material and did not source controlled material or sell any FSC Controlled Wood since the previous audit), including cases of zero sales. 1.2. The certification body shall conduct for an organization at least one (1) surveillance evaluation per certification cycle as an unannounced evaluation. 1.3. The certification body shall conduct for an organization at least one (1) additional unannounced evaluation, which meets the requirements in Section 2 of this advice note, per certification cycle, and this evaluation should take place prior to last year of validity of the FSC certification. NOTE: In this context, an unannounced evaluation to specifically evaluate the organization's conformance to the FSC core labour requirements does not replace the requirement for having four (4) surveillance evaluations per certification cycle. **2 Requirements for unannounced evaluations for the evaluation of an organization's conformance to the FSC core labour requirements** 2.1. The certification body shall ensure the scope of the evaluation is solely to evaluate the organization's conformance to the FSC core labour requirements. 2.2. The certification body should ensure the time allocated to the evaluation is a minimum of one (1) day and sufficient to cover the evaluation of the FSC core labour requirements, including interviews with workers, as described in Clause 2.3 of this advice note. 2.3. The certification body shall conduct, at minimum, interviews with ten (10) workers, or in cases where there are fewer than ten (10) workers, interviews with all workers. 2.4. The certification body shall ensure to include in the audit team at least one (1) member with specific competence in social issues of the local context. NOTE 1: 'local context' is to be interpreted as the country or region where the organization is located. NOTE 2: With reference to <FSC-STD-20-011 V4-2 chain of Custody Evaluations>, Clause 11.3e), competency in social issues is considered 'specific', and may, for example, include auditors with social auditing background and/or experience.

	2.5. The certification body shall prepare and, on request, submit the following directly to Assurance Services International (ASI) by email: a) Finalized evaluation report in accordance with Clause 12.1 in <FSC-STD-20-011 V4-2 Chain of Custody Evaluations>, containing sections relevant to FSC CLR, including scope and evaluation findings; and b) Supplementary documentation detailing, at minimum, the number of interviews conducted and a concise short summary of each interview including detail of the topics discussed, with any identifying worker information anonymized. NOTE 1: The supplementary documentation may include, in addition to information on worker interviews, any remarks on the evaluation that the certification body considers relevant, and which have not been raised formally in the evaluation report as a non-conformity or observation. These remarks are written for the benefit of ASI, and are not for the client. NOTE 2: If requested by ASI, the email for the certification body to use to send the report and supplementary documentation is: asi-info@asi-assurance.org .
Annex I	This annex lists the countries or regions of high integrity risk in relation to the FSC core labour requirements to which this advice note applies. Any addition of countries or regions to this annex is the prerogative of FSC, and any changes will be communicated to stakeholders and include reference to the time of effectiveness. • *Republic of the Union of Myanmar*

FSC International – Policy & Performance Unit
Adenauerallee 134
53113 Bonn
Germany

Phone: +49 -(0)228 -36766 -0
Fax: +49 -(0)228 -36766 -65
Email : psu@fsc.org