

DER-STD-40-004_02 Delay in applicability for activities outsourced for storage, logistics, or forwarding of 'finished and labelled' products

Normative references	Clause 13.2, FSC-STD-40-004 V3-1; ADVICE-40-004-23 V2-0; INT-STD-40-004_30.
Scope	☒ Generic (applicable by all certificate holders) ☐ Specific (applicable only upon individual request and PSU confirmation)
Approval	20 October 2025
Effective date	22 October 2025
Period of validity	30 June 2026
Rationale	Various stakeholders have reached out to FSC International with concerns that they are unable to meet the requirements in the revised ADVICE-40-004-23 V2-0 by the end of the given transition date, which is applicable to all non-FSC-certified contractors with outsourcing agreements in the scope of the chain of custody certification activities. Additionally, they have noted their concern for implementing the requirement for warehouses that store stock that is 'finished and labelled' but not yet sold, where the property is not owned by or under the control of the Organization. The reasoning for this difficulty relates to the resource effort and cost to implement these requirements for potentially hundreds of sites globally, in addition to there being 'no risk of mixing', as the products are 'finished and labelled'. In the Chain of Custody Standards Revision, there is the suggestion that storage sites or logistic activities will be exempted from the requirements for outsourcing agreements, and therefore any relevant requirements related to the FSC core labour requirements, provided in ADVICE-40-004-23 V2-0. Due to this potential change in the requirements forthcoming, which will be initially consulted as part of the first draft from 15 November 2025 until 25 January 2026, FSC International is providing this derogation for the provision of storage, logistics, or forwarding services for 'finished and labelled' products, to provide time for the analysis of the results of the consultation. Dependent on the results of this analysis, the direction of future changes should be clearer by mid-2026, and FSC International will subsequently provide further action, such as extension of the derogation until the implementation of the new standard requirements.
FSC Conclusion	FSC grants the right for a certified Organization that outsources storage, logistics, or forwarding services for 'finished and labelled' products to delay meeting the requirements in ADVICE-40-004-23 V2-0 for any of its non-FSC-certified contractors beyond the transition end date (31 December 2025), provided that there is no risk of mixing of

the labelled products during the storage, logistics, or forwarding activities.
