

**ADVICE-20-001-12 Consequences of Uncontrollable or Non-auditable
V2-0 Risks impacting the Forest Sector at large
(amended)**

Normative reference FSC-STD-20-001 V4-0, Clauses 1.2.3 u) ii. and 1.4.7 to 1.4.9
FSC-STD-40-004 V3-0, clause 12.1 / FSC-STD-40-004 V3-1, clause 13.1
FSC-STD-40-007 V2-0, clause 2.1
FSC-POL-20-005 V3-1, Clause 6.7
FSC-ADV-40-005-25, Clause 1
FSC-ADV-60-002-01, Clause 2
IAF ID 3: 2011, Clause 2.1

Scope This advice note applies to all certification bodies.
Depending on the risk situation, the advice note affects either all certificate holders or those certificate holders generating product claims from their FM/CoC, CoC, or CW-FM certification.

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Background Recent geopolitical tensions and country specific risks related to the integrity and credibility of maintaining FSC certification in relevant geographic contexts have highlighted the need for FSC to address those risk situations that can neither be effectively controlled in uncertified supply chains nor covered and addressed by relevant certification requirements and the auditing process for FSC certified organizations.

Such risks which are determined by actors and events outside the control of individual organizations can have different causes and consequences, but they have in common that they typically affect non-certified and certified organizations alike and put into question the continued sourcing of material as controlled or certified from these organizations due to forest or even business sector wide risks related to the performance of relevant organizations or related to their traded products for which there are no effective mitigation measures.

With this Advice Note, FSC seeks to address these risk situations and specifies what the appropriate measures are for certification bodies to apply towards the affected organizations and their customers sourcing relevant material for inclusion in FSC product groups.

Version history V1-0: Approved 8 March 2022
V2-0: Approved 30 March 2022

- Editorial changes to clauses 1 to 4 and 6
- New clause 7 regulating the continued provision of evaluations
- Amended clause 9 (former clause 8) about the need to also inform certificate holders about restrictions to no longer source reclaimed material from or outsource activities to relevant countries

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- ADVICE**
1. In the event of a risk situation which is determined by events or circumstances beyond the control of individual organizations and which is affecting all, non-certified and certified, forest sector organizations within the relevant geographical context, the certification body shall take action as per clauses 2. and 3. below if:
 - a. there are extraordinary events and circumstances as defined by IAF ID 3:2011 which make an orderly continuation of certification body audits or ASI assessments impossible, and which would lead to exceeding the specified timelines for conducting relevant certification or accreditation activities; or
NOTE: This would apply, for example, when the assessment and evaluation activities necessary to address those risk situations entail undue risks for the people involved in such activities and which could apply in the same manner also for verification activities related to control measures for sourcing non-certified material as controlled. In the case of being applicable to the sourcing of controlled material, the relevant FSC Risk Assessment would reflect this circumstance by a corresponding 'specified risk' designation and a mandatory control measure not to source material from the respective country.
 - b. the applicable FSC Risk Assessment designates risk(s) as 'specified' based on FSC-ADV-60-002-01, resulting in mandatory control measure(s) to avoid sourcing.
NOTE i: This could apply when, for example, the risk designation for CW Indicator 2.1 in an FSC Risk Assessment is set by FSC International to 'specified risk' for the whole country with a mandatory control measure not to source material as controlled, in which case any trade of relevant forest-based material from that country which is eligible to be included in FSC product groups (i.e., certified, controlled or reclaimed) would be affected.
As a result, all certification types except FM certification would be affected.
NOTE ii: This could further apply when the risk designation for CW Indicator 2.2 in an FSC risk assessment would be set to 'specified risk' for the whole country and the forest sector at large with a mandatory control measure not to source material as controlled, because the assessment required to demonstrate conformity would result in undue risks for auditors, interviewed staff, and other informants as outlined in clause 1a above.
As a result, all certification types would be affected.
 2. The certification body shall suspend or withdraw the certificates that are affected by extraordinary events and circumstances as outlined in clause 1a above, as follows:
 - a. For risk situations related to the performance of organizations: the certification body shall suspend or withdraw all certification types.
NOTE i: This includes (1) Joint forest management and chain of custody certification (FM/CoC), (2) Chain of custody certification (CoC), (3) Chain of custody certification with Controlled Wood in the scope (CW/CoC), (4) Controlled wood forest management certification (FM/CW), (5) Project chain of custody certification (CoC), and (6) Forest management certification (FM).
NOTE ii: Withdrawal would be required if the certification body's scope is reduced due to the accreditation body's inability to assess the certification body's activities – see the example under clause 1a above.
 - b. For risk situations related solely to the product trade of organizations: the certification body shall suspend all certification types which are allowing to make FSC product or project claims.
NOTE: This excludes 'Forest management certification (FM)' as it does not allow the generation and/or passing of relevant FSC claims.

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3. The certification body shall suspend the certificates that are within the geographical scope of the FSC Risk Assessment with relevant 'specified risk' designations as outlined in clause 1b above, as follows:
 - a. For 'specified risk' designations that are related to forest sector wide performance risks of organizations, the certification body shall suspend all certification types.

NOTE i: This includes (1) Joint forest management and chain of custody certification (FM/CoC), (2) Chain of custody certification (CoC), (3) Chain of custody certification with Controlled Wood in the scope (CW/CoC), (4) Controlled wood forest management certification (FM/CW), (5) Project chain of custody certification (CoC), and (6) Forest management certification (FM).

NOTE ii: This would apply, for example, in case of a 'specified risk' designation for CW Indicator 2.2 as outlined in the note under clause 1b above.
 - b. For 'specified risk' designations that are related to forest sector wide risks related solely to the trade in forest-based material: the certification body shall suspend all certification types which are allowing to make FSC product or project claims.

NOTE i: This excludes 'Forest management certification (FM)' as it does not allow the generation and/or passing of relevant FSC claims.

NOTE ii: This would apply, for example, in case of a 'specified risk' designation for CW Indicator 2.1 as outlined in the note under clause 1b above.
 4. The certification body shall reduce the scope of relevant group and multi-site certificates to ensure that group members and participants of multi-site certificates which are affected by the extraordinary events and circumstances or are based within the geographical scope of the FSC Risk Assessment with relevant risk designations are excluded from such certificates.
 5. 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.

NOTE: CBs will be notified via the FSC Accreditation Forum.
 6. The suspension, withdrawal, or scope reduction shall become effective:
 - a. with the date stipulated by FSC in case of extraordinary events and circumstances; or
 - b. with the date by which the organization shall adapt its due diligence system to the revised FSC Risk Assessment as per FSC-ADV-40-005-25 (clauses 2a and 2b above).

NOTE: General requirements as stipulated by FSC-STD-20-001 V4-0, Clauses 1.4.7 – 1.4.9 apply for the duration of the suspension.
 7. The certification body may continue to conduct regular surveillance and re-certification evaluations of suspended certificate holders based on this advice note in accordance with applicable FSC requirements, unless there are:
 - a. extraordinary events and circumstances as defined by IAF ID 3:2011 which make an orderly continuation of CB certification body audits or ASI assessments impossible; or
 - b. 'specified risk' designations that are related to forest sector wide performance risks of organizations as per clause 3a. above.
 8. The certification body shall require its relevant certificate holders and multi-site participants to identify and inform their customers of the

suspension or withdrawal according to FSC-STD-20-001 V4-0, Clause 1.2.3 u) ii.

9. 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 as outlined in clause 1b above within five (5) business days after having been notified about these changes as follows:
 - 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 according to FSC-ADV-40-005-25;
 - 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, clause 2.1 about the need to exclude relevant suppliers as part of their validation process by the date stipulated by FSC according to clause 6 in this advice note.
 - 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 about the need to exclude relevant contractors from providing such activities by the date stipulated by FSC according to clause 6 in this advice note.