



Interpretation

INTERPRETATIONS OF THE NORMATIVE FRAMEWORK

Controlled Wood

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Title: Interpretations of the Normative Framework

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CONTENTS

STANDARDS	4
FSC-STD-20-012 (V1-1) STANDARD FOR EVALUATION OF FSC CONTROLLED WOOD IN FOREST MANAGEMENT ENTERPRISES	4
FSC-STD-30-010 (V2-0) FSC CONTROLLED WOOD STANDARD FOR FOREST MANAGEMENT ENTERPRISES	6
FSC-STD-40-005 (V2-1) STANDARD FOR COMPANY EVALUATION OF FSC CONTROLLED WOOD	13
FSC-STD-40-005 (V3-0 and V3-1) REQUIREMENTS FOR SOURCING FSC CONTROLLED WOOD	21
DIRECTIVES	30
FSC-DIR-40-005 FSC DIRECTIVE ON FSC CONTROLLED WOOD	30

STANDARDS

FSC-STD-20-012 (V1-1) STANDARD FOR EVALUATION OF FSC CONTROLLED WOOD IN FOREST MANAGEMENT ENTERPRISES

Code	INT-STD-20-012_01 (also published under FSC-STD-30-010 with code INT-STD-30-010_06)
Requirement (s)	V1-1, Clause 1.1
Publication date	10 July 2015
<p>1) Is the conversion of plantations that have previously been established on agricultural land back to agricultural land acceptable according to the requirements of FSC-STD-30-010 (Clause 6.1)?</p> <p>2) Are abandoned (unmanaged) plantations established on agricultural land and destined for conversion back to agricultural land eligible for certification according to FSC-STD-30-010?</p> <p>1) Yes. Only conversion of natural and semi-natural forests and other wooded ecosystems such as woodlands and savannahs to plantation or non-forest uses is not allowed according to the standard (with exceptions specified in Clause 6.3).</p> <p>2) No. The certification of abandoned or unmanaged plantations does not meet the intent of the standard, which is designed for application by forest management enterprises (FMEs) at the forest management unit (FMU) level. According to the definitions of FME and FMU, the implementation of the standard involves forest management, which shall not be downgraded to clear cutting of plantations.</p>	

Code	INT-STD-20-012_02 (also published under FSC-STD-30-010 with code INT-STD-30-010_07)
Requirement (s)	Sections 3-7
Publication date	Previous version: 9 August 2015; this Version: 16 January 2018
<p>According to Clause 7.4 of FSC-STD-20-012 V1-1, “A non-compliance shall be considered major if, either alone or in combination with further non-compliances of other indicators, results in, or is likely to result in a fundamental failure to achieve the objectives of the standard in the forest management unit(s) within the scope of the evaluation.” How shall this be interpreted when considering non-compliances with requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0)?</p> <p>Non-compliances for requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0) shall always be considered major. As per Clauses 7.6 and 7.7 of FSC-20-012 V1-1, the certification body shall not issue or reissue a certificate if there is a major non-compliance with the requirements of the standard, and the certificate shall be suspended in case a major non-compliance is</p>	

identified after the Controlled Wood certificate has been issued. The note under Clause 7.6 of the standard does not apply to major non-compliances for Controlled Wood categories.

Minor non-compliances are possible only in instances where requirements for Sections 1 and 2 of FSC-STD-30-010 V2-0 are not implemented correctly, and/or the status of the material as ‘FSC Controlled Wood’ is not affected.

Code	INT-STD-20-012_03
Requirement (s)	V1-1, Clauses 7.6-7.7
Publication date	01 July 2016

Is restoration of converted forests containing high conservation values required to close a major corrective action request issued according to Clause 6.3 in FSC-STD-30-010 V2-0?

No, the standard does not specify the action to be taken to address such a corrective action request. In the context of this standard, a certificate shall be suspended when a major nonconformity is identified (Clause 7.7). It is the responsibility of the organization to implement appropriate measures to correct the nonconformity in order to lift the suspension.

Code	INT-STD-20-012_04
Requirement (s)	V1-1, Clauses 1.3; 9.2.1.c) and 9.3.1
Publication date	29 September 2023

Is a certification body required to visit the interiors of a garage located within the Forest Management Unit (MU) during the surveillance evaluation?

Yes, in cases where this facility (the garage) is covered by the definition of Management Unit in FSC-STD-01-001:

Management Unit: A spatial area or areas submitted for FSC certification with clearly defined boundaries managed to a set of explicit long term management objectives which are expressed in a management plan. This area or areas include(s):

- all facilities and area(s) 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; and
- all facilities and area(s) 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.

In those cases, the certification body shall provide credible guarantee that there is no major failure in conformance with the requirements of the FSC-STD-30-010.

FSC-STD-30-010 (V2-0) FSC CONTROLLED WOOD STANDARD FOR FOREST MANAGEMENT ENTERPRISES

Code	INT-STD-30-010_01 (also published under FSC-STD-40-005 with code INT-STD-40-005_02)
Requirement (s)	V2-0
Publication date	31 January 2012
<p>Within a National Initiative “unspecified risk” category, is it possible for a company to classify a smaller district as “low risk”?</p> <p>No, unless done at the FMU level through the process described in Annex 3 of FSC-STD-40-005. According to this standard, where national or regional interpretation or guidance relating to Annex 2 has been provided by an FSC accredited National Initiative, this interpretation shall prevail.</p> <p>Other option would be that the Forest Manager got certified according to FSC-STD-30-010.</p>	

Code	INT-STD-30-010_06 (also published under FSC-STD-20-012 with code INT-STD-20-012_01)
Requirement (s)	V2-0, Section A (Scope), Clause 6.1
Publication date	10 July 2015
<p>1) Is the conversion of plantations that have previously been established on agricultural land back to agricultural land acceptable according to the requirements of FSC-STD-30-010 (Clause 6.1)?</p> <p>2) Are abandoned (unmanaged) plantations established on agricultural land and destined for conversion back to agricultural land eligible for certification according to FSC-STD-30-010?</p> <p>1) Yes. Only conversion of natural and semi-natural forests and other wooded ecosystems such as woodlands and savannahs to plantation or non-forest uses is not allowed according to the standard (with exceptions specified in Clause 6.3).</p> <p>2) No. The certification of abandoned or unmanaged plantations does not meet the intent of the standard, which is designed for application by forest management enterprises (FMEs) at the forest management unit (FMU) level. According to the definitions of FME and FMU, the implementation of the standard involves forest management, which shall not be downgraded to clear cutting of plantations.</p>	

Code	INT-STD-30-010_04
Requirement (s)	V2-0, Clause 1 e) (Note)

Publication date	21 August 2013
<p>How should the nationally developed HCV Framework be applied according to the standard FSC-STD-30-010?</p> <p>The standard FSC-STD-30-010 requires, that the Forest Management Enterprise shall consider guidance that may be provided by FSC International, FSC regional offices, or by FSC accredited national initiatives in relation to interpreting the requirements of FSC-STD-30-010 in a particular national or sub-national context. There is an approved 'High Conservation Values (HCVs) evaluation framework for use in the context of implementing FSC Certification to the FSC Principles and Criteria and Controlled Wood standards' developed by FSC Australia. The following questions aim to clarify how to implement the Framework. How shall requirements be interpreted that use the term 'consider' – are all the elements of the Framework mandatory? Or can the FME select which elements they deem to be relevant? Do all of the steps need to be followed for each HCV1-6? Note that some of the steps have been pointed out to be contradictory.</p> <p>Is there any difference in the Framework requirements for SLIMF or plantation forest?</p> <p>FME shall use approved HCV Framework and apply all its elements relevant for FME. In case of contradiction these shall be reported to relevant FSC National Partner and PSU.</p> <p>SLIMF: HCV Framework serves mainly for HCV identification. Annex 2 of FSC-STD-30-010 (5.2) requires HCVs identification, thus HCV Framework shall be used in SLIMF operations.</p> <p>Plantation: Framework shall also be used for plantations when relevant as per Framework contents.</p>	

Code	INT-STD-30-010_02
Requirement (s)	V2-0, Clause 3.2, Intent Box.
Publication date	4 May 2012
<p>In countries where there is an approved FSC National Standard, how should approved elements in the national standard which could equally pertain to the interpretation and application of Controlled Wood (FSC -STD-30-010 V2-0) be regarded?</p> <p>Where elements of an approved national standard can be equally applied to the interpretation and application of Controlled Wood in a given country, these elements shall be applied in relation to the specific category of Controlled Wood; e.g. advice in the national standard on the assessment of legal compliance.</p>	

Code	INT-STD-30-010_07 (also published under FSC-STD-20-012 with code INT-STD-20-012_02)
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Requirement (s)	V2-0, Sections 3-7
Publication date	Previous version: 9 August 2015; this Version: 16 January 2018
<p>According to Clause 7.4 of FSC-STD-20-012 V1-1, “A non-compliance shall be considered major if, either alone or in combination with further non-compliances of other indicators, results in, or is likely to result in a fundamental failure to achieve the objectives of the standard in the forest management unit(s) within the scope of the evaluation.”</p> <p>How shall this be interpreted when considering non-compliances with requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0)?</p> <p>Non-compliances for requirements relating to the five Controlled Wood categories (Sections 3-7 of FSC-STD-30-010 V2-0) shall always be considered major. As per Clauses 7.6 and 7.7 of FSC-20-012 V1-1, the certification body shall not issue or reissue a certificate if there is a major non-compliance with the requirements of the standard, and the certificate shall be suspended in case a major non-compliance is identified after the Controlled Wood certificate has been issued. The note under Clause 7.6 of the standard does not apply to major non-compliances for Controlled Wood categories.</p> <p>Minor non-compliances are possible only in instances where requirements for Sections 1 and 2 of FSC-STD-30-010 V2-0 are not implemented correctly, and/or the status of the material as “FSC Controlled Wood’ is not affected.</p>	

Code	INT-STD-30-010_08
Requirement (s)	V2-0, Section 4
Publication date	03 May 2017
<p>1) The term ‘Traditional and Indigenous Peoples groups’ could be broken into ‘Traditional groups’ and ‘Indigenous Peoples groups’. It could also be broken down into ‘Traditional Peoples groups’ and ‘Indigenous Peoples groups’. Which is the correct reading?</p> <p>2) What is the definition of ‘Traditional Peoples’ and ‘Indigenous Peoples’?</p> <p>3) What is the timeframe for ‘long established custom or traditional occupation and use’?</p> <p>1) The correct reading is ‘Traditional Peoples groups’ and ‘Indigenous Peoples groups’.</p> <p>2) The definitions as provided in the ‘<i>FSC Principles and Criteria for Forest Stewardship</i>’ (FSC-STD-01-001 V5-2) apply:</p> <p>Traditional Peoples: Traditional Peoples are social groups or peoples who do not self-identify as Indigenous and who affirm rights to their lands, forests and other resources based on long established custom or traditional occupation and use (Source: Forest Peoples Programme (Marcus Colchester, 7 October 2009)).</p> <p>Indigenous Peoples: People and groups of people that can be identified or characterized as follows:</p>	

- The key characteristic or criterion is self-identification as Indigenous Peoples at the individual level and acceptance by the community as their member
- Historical continuity with pre-colonial and/or pre-settler societies
- Strong link to territories and surrounding natural resources
- Distinct social, economic or political systems
- Distinct language, culture and beliefs
- Form non-dominant groups of society
- Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities.

(Source: Adapted from United Nations Permanent Forum on Indigenous Issues, Factsheet 'Who are Indigenous Peoples' October 2007; United Nations Development Group, 'Guidelines on Indigenous Peoples' Issues' United Nations 2009, United Nations Declaration on the Rights of Indigenous Peoples, 13 September 2007).

3) There is no specific timeframe defined by FSC. Communities or persons can acquire customary rights by various means which can be long term (living in an area for a longish period of time) or short term (opening up a new area in line with customary law or via transfer). Thus, under customary law, what is important is not how long a person or community has been on the land but the means by which they acquired or asserted their rights.

Code	INT-STD-30-010_05
Requirement (s)	V2-0, Clause 4.2
Publication date	19 May 2014
<p>Shall the certification body issue a non-compliance against Clause 4.2 and/or 4.5 of FSC-STD-30-010 where a minority of stakeholders do not agree on the dispute resolution process?</p> <p>Non-conformity against Clause 4.2 shall be issued in cases where a stakeholder(s) that is one of the main parties in the dispute disagrees with the resolution process. Non-conformity against Clause 4.2 shall not be issued in cases where the stakeholder(s) that disagrees is not one of the main parties to the dispute.</p> <p>The main parties to the dispute are those who are directly involved in the dispute (e.g. complainants/plaintiffs and defendants to which the claim is made against).</p>	

Code	INT-STD-30-010_03
Requirement (s)	V2-0, Section 6
Publication date	8 February 2013

The use of the present tense (*being converted; take place, etc.*) suggests that FSC accepts conversion that has happened in the past. But until when? What is the cut-off date?

The cut-off date for FSC certification for controlled wood for forest management enterprises is the date when the organization signs the certification agreement with the CAB as this document includes the general requirement to adhere to all applicable rules and regulations as published by FSC (see FSC-STD-20-001 V3-0 Clause 7.2 c).

Code	INT-STD-30-010_10
Requirement (s)	V2-0, Section 5 and 6
Publication date	16 January 2018

There is a diversity of opinion among experts and scientific studies on how logging activities in Karri forests impact RTE species. In particular, it is unclear whether or not the reforestation and silviculture procedures applied by organizations constitute a conversion from the natural variation of mixed and karri dominated forests to forest stands of predominantly karri.

While the organization's procedures may require that a mix of tree species is replaced where a mixed forest has been harvested, it may not require that the mix of reforested trees be estimated on the proportion of each tree species in the stand at the time of harvest. This is because the proportion of each tree species at the time of planting does not predicate the final proportion in a mature stand, since natural disturbance (especially fire) will shape the stand as it grows. However, a lack of regulation on the proportions planted allows for reforested mixed stands to contain a mix of species that is predominantly karri even if karri was not the dominant tree species to begin with. This may lead to conversion of mixed forests over time. HCV 1 Rare Threatened and Endangered (RTE) species that rely on other tree species within the karri and mixed forests in the FMU are potentially negatively affected by the loss of mixed forest stands because they show preference for marri trees, which tend to create better hollows. However, this is not firmly established and hollow nesting species will use karri trees, but it is not known what impact the loss of mixed forest stands would have on these RTE species.

Against the background of uncertain unscientific knowledge,

- 1. Do the activities of the organization need to be restricted / adjusted, taking the prerequisite of a precautionary approach into consideration so that conversion and/or deterioration of forest ecosystems are prevented, and**
- 2. Does FSC's standard requirements for conversion in FSCSTD-30-010 need to be adapted or whether more scientific information be sought by FSC so that there is a resolution of this dispute**

1) Deterioration of forest containing HCV 1, including changes in species composition and the forest structure in management/regeneration cycle shall be considered as a threat to HCV values. Considering a precautionary approach, as well as requirements in Section 5 of the standard, the organization shall ensure that deterioration of the forest ecosystems is prevented. This can be demonstrated by compliance with Section 5 of the standard.

2) The provided information is not sufficient for FSC to conclude whether ongoing forest management practices will lead to conversion. FSC recommends further research to be conducted by FSC Australia in this regard.

Code	INT-STD-30-010_09
Requirement (s)	V2-0, Clause 6.1
Publication date	18 July 2017
<p>In some concession areas, conversion is often being done through illegal logging and encroachment by parties other than the forest manager. As the primary objective is plantation management on such concessions, little or no effort is made to control the illegal conversion occurring in the natural forests.</p> <p>Do the requirements of 6.1 apply to activities carried out by parties other than the forest manager or their contractors? To put another way, would uncontrolled illegal activities carried out by parties other than the FME resulting in conversion of forests to non-forest use on the FMU(s) included in the scope of the evaluation be a nonconformance with criterion 6.1?</p> <p>Yes. As FSC-STD-30-010 is applied at the level of the FMU, activities taking place in FMUs included in the scope of the certificate shall be considered in determining conformance with the requirements, regardless of who carries out the activities. Therefore, if forest conversion is occurring as the result of illegal activities within the FMU, this constitutes a nonconformance with Clause 6.1.</p>	

Code	INT-STD-30-010_11 (also published under FSC-STD-40-005 V3-1 under code INT-STD-40-005_24)
Requirement (s)	V3-0, Clauses 5.1 and 5.2
Publication date	16 January 2018, amended on 02 September 2021
<p>In the CW/FM standard, under High Conservation Value Forests (HCVFs), what is the definition of ‘old-growth forest’ in the Australian context? What is the minimum area for determination of ‘old-growth forest’?</p> <p>FSC-STD-AUS-01-2018 <i>FSC National Forest Stewardship Standard of Australia</i> and the Australian <i>The High Conservation Values (HCVs) Evaluation Framework - For the use of implementing Controlled Wood standards</i> Version 2-0 (2021) have defined ‘old-growth forest’ as:</p> <p>“Ecologically mature forest where the effects of disturbances are now negligible.”</p> <p>Where ‘mature forest’ is defined as:</p> <p>“forests that contain overstorey trees typically greater than 100 years old and beginning to develop structural features typically found in older forests, including large spreading crowns, tree hollows and stages of senescence.”</p> <p>In addition, FSC-STD-AUS-01-2018 <i>FSC National Forest Stewardship Standard of Australia</i> has provided the following guidance:</p> <p>“Identification and assessment of HCV 3.3 [old-growth forest] should include consideration of:</p> <ol style="list-style-type: none"> a. The degree to which it is rare and/or threatened at a global, national or regional level 	

- b. Its distinctiveness in terms of size and quality (including stand structural characteristics and ecological functions) in a landscape level context
- c. Geographic range.

Determining these shall be based on assessments by government agencies, peer reviewed literature, or assessments by recognised experts, and be considered at the landscape level.“

In the absence of a specific definition of old-growth forest in FSC-STD-30-010 V2-0 *FSC Controlled Wood Standard for Forest Management Enterprises* , the above definitions and guidance shall be followed to identify and assess old-growth forest in the Australian context.

Regarding the minimum area for determining old-growth forest, the Australian *The High Conservation Values (HCVs) Evaluation Framework - For the use of implementing Controlled Wood standards* Version 2-0 (2021) states that “The minimum area for Old Growth is as per the definition for Minimum Threshold for HCV Areas.”

Where the definition of ‘minimum area threshold for HCV Areas’ specifies that “In the identification of HCV Areas, the minimum size threshold will be the smallest area in which the viability and integrity of that particular designation can be maintained, based on the best available scientific information, including recognised government and expert definitions and research.”

FSC-STD-40-005 (V2-1) STANDARD FOR COMPANY EVALUATION OF FSC CONTROLLED WOOD

Code	INT-STD-40-005_04 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_02)
Requirement (s)	Applies to all requirements where the CPI is mentioned
Publication date	6 September 2013
<p>In 2012 the Corruption Perception Index (CPI) changed from a scale of 0-10 to a scale of 0-100. Shall the new 0-100 CPI scale be implemented in FSC normative documents that currently still reference the previous 0-10 scale system?</p> <p>Yes, CPI references in FSC normative documents using the 0-10 scale system shall be converted to the new scale.</p> <p>A reference to a CPI index threshold '5' based on the old scale system becomes a CPI index '50' applying the new scale.</p>	

Code	INT-STD-40-005_06
Requirement (s)	V2-1, Categories 2, 3, 4
Publication date	18 May 2014
<p>Can material originating from artificially submerged forests be evaluated according to the standard FSC-STD-40-005?</p> <p>Materials harvested from standing "dead" forests that have been e.g. submerged to construct water reservoirs or dams are eligible for evaluation under the FSC Controlled Wood Standard FSC-STD-40-005 V2-1. In this case the district shall be set at the submerged area in question. When evaluating conformance with the standard, special attention shall be given to the requirements of Controlled Wood Categories 2, 3 and 4, which, depending on circumstances, may be particularly challenging to be met. This interpretation supersedes any former interpretations relevant for this question.</p>	

Code	INT-STD-40-005_14 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_10)
Requirement (s)	V2-1, Clause 7.1
Publication date	9 July 2014

Can timber of unknown origin collected from beaches be evaluated according to the standard FSC-STD-40-005?

No, timber collected from beaches is not eligible for evaluation under the FSC Controlled Wood Standard FSC-STD-40-005 V2-1.

Code	INT-STD-40-005_16 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_11)
Requirement (s)	V2-1, clause 9.1
Publication date	10 October 2014

If a certified company sources material that has previously been FSC certified or covered by another company's FSC Controlled Wood verification program but has since been traded by a non-certified company (therefore breaking the Chain of Custody), can this material be considered controlled with-out conducting a full verification program and risk assessment?

For previously FSC-certified material from a broken Chain of Custody to be considered as FSC Controlled Wood, the company must trace the material back to the certified company that traded it to the non-certified company where the Chain of Custody was broken, and conduct an audit of the supply chain. This audit shall demonstrate with verifiable documentation that the material is identifiable and traceable and has not been mixed with uncontrolled material.

For previously controlled material from a broken Chain of Custody to be considered as FSC Controlled Wood, the district of origin must be determined within/through the company's own Controlled Wood verification program, for which all relevant normative requirements apply. For this purpose, risk assessments performed by other entities (e.g. a supplier with a valid FSC certificate that includes FSC Controlled Wood in its scope that sold FSC Controlled Wood (without a claim) to a non-certified entity) may be used as additional sources of information.

Code	INT-STD-40-005_11 V2-1 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_07)
Requirement (s)	V2-1, Section 11
Publication date	9 July 2014

In cases where there is an approved national risk assessment, is it acceptable for the certificate holder to use the National Risk Assessment to satisfy the controlled wood requirements for conducting a risk assessment as specified in FSC-STD-40-005 and FSC-DIR-40-005, rather than having to generate its own risk assessment?

The use of approved National Risk Assessments (NRAs) for sourcing Controlled Wood according to FSC-STD-40-005 is mandatory. Certificate holders have different options for aligning their verification programs with the results of applicable NRAs. Certificate holders may, for example, use NRAs available on FSC's website and/or the Global Forest Registry, or generate or update a new or existing company-

developed risk assessment with the risk designation(s) provided in relevant NRAs. These examples are not exhaustive.

Code	INT-STD-40-005_05 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_03)
Requirement (s)	V2-1, Clause 11.1
Publication date	5 February 2014

Which process shall be implemented if a certified FMU is under suspension in a district that has been designated as low risk for all CW categories either by a National Risk Assessment or by a COC Certificate Holder in their FSC Controlled Wood verification pro-gram when the COC Certificate Holder wants to source from this FMU?

At the moment of suspension, the products sold by the certified FMU* are losing their FSC status. As the FMU is located in a designated low risk district for CW, the products may still be sourced as “controlled material” under the following conditions:

1. As some or all CW categories may be affected by activities that led to the suspension of the FMU, the COC Certificate Holder shall review and if necessary revise their risk assessment for the area of the suspended FMU.
2. The review/revision of the risk assessment shall be completed by the COC Certificate Holder within a period of two months from the date of suspension of the FMU certificate.
3. The COC Certificate Holder shall submit the reviewed/revise risk assessment to their CB for verification.
4. The reviewed/revise risk assessment shall be verified by the CB no later than one month after the COC Certificate Holder has submitted its reviewed/revise risk assessment, before it can be applied (see FSC-STD-40-005 V2-1 Clause 11.1).
5. As the whole district is considered low risk, the products sourced from the suspended FMU are considered controlled until the verification of the reviewed/revise risk assessment is completed by the relevant CB.
6. The outcome of the review/revision process including verification by the relevant CB will then determine the risk designation for the suspended FMU.
7. Material sourced from the area shall be classified as unspecified risk, if the timelines of review/revision and verification of the risk assessment (2, 4) is not met.

* According to the standard FSC-STD-01-001 or FSC-STD-30-010

Code	INT-STD-40-005_18 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_12)
Requirement (s)	V2-1, Clause 13.2, Annex 3
Publication date	28 October 2014
<p>Shall the outcomes of a company verification program according to Annex 3 be made publicly available?</p> <p>No, currently there are no requirements for publishing the outcomes of verification according to Annex 3. The standard does not limit such an opportunity, however.</p>	

Code	INT-STD-40-005_08 V2-1
Requirement (s)	V2-1, Section 14
Publication date	9 July 2014
<p>If a company receives a complaint regarding their risk assessment and/or company verification program, does it matter if the complainant identifies the complaint as formal or informal as per the FSC Dispute Resolution Process?</p> <p>No, it does not matter. The company is required to deal with all complaints that are received according to the requirements of Section 14 of FSC-STD-40-005, irrespective of the complaint classification by a complainant. Controlled Wood requirements for the handling of complaints by Certificate Holders are not subject to the FSC Dispute Resolution Process and shall be evaluated by the Certificate Holder, according to their own mechanism.</p>	

Code	INT-STD-40-005_09 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_05)
Requirement (s)	V2-1, Annex 1
Publication date	9 July 2014
<p>With regards to Category 3 (HCV), what is the minimal level of detail for describing the sourcing in the district of origin in the published company risk assessment? If the district of origin includes potentially controversial sources, when the company describes their sourcing in this area, must the description of their sourcing explicitly state that they are not sourcing from controversial FMUs in that district?</p> <p>The minimum required information to be included in the publicly available results of the risk assessment are provided in</p> <p>ADVICE 40-005-07 of FSC-DIR-40-005, which applies to all CW categories. In case of potentially controversial activities in FMUs located in a low risk district (See ADVICE 40-005-02 of FSC-DIR-40-005), a company should mention the existing FMUs with potential controversial activities in the publicly available results of a risk assessment.</p>	

Code	INT-STD-40-005_15 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_04)
Requirement (s)	V2-1, Annex 1
Publication date	9 July 2014
<p>How should companies treat ecoregions that are not within the WWF Global 200 but are listed as ‘critical/endangered’ or ‘threatened’ by WWF? Should this information always be included in risk assessments, under 3.1?</p> <p>The standard requires consideration of ‘ecoregionally significant HCVs’ and does not limit the recognition of ecoregions to Global 200 ecoregions. General references provided in the standard direct to WWF sources without limitation to Global 200 ecoregions (FSC-STD-40-005, Annex 1, definition of ecoregion). Therefore, information about threatened ecoregions other than the examples provided in FSC-STD-40-005 and FSC-DIR-40-005 should be taken into account. The company shall not ignore known and available sources of information in addition to the ones listed in normative documents.</p>	

Code	INT-STD-40-005_13 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_09)
Requirement (s)	V2-1, Annex 1
Publication date	9 July 2014
<p>Can a district of origin cover more than one country? If so, is a separate risk assessment required for each country, given the heterogeneity in assessing risk between two different sets of laws? What about within countries where the sub-national units (states, provinces, etc.) have the independence to create their own resource use and protection laws?</p> <p>According to its definition, a ‘district’ is considered to be a generic geographical definition within a country. Subject to the above, various guidance and requirements are provided stating that how a district shall be established depends on the CW category under assessment. In the case of National Risk Assessments (NRAs) it is possible to develop shared NRAs for countries sharing homogenous conditions (e.g. sharing the same ecoregions), according to the procedure FSC-PRO-60-002 V2-0 (FSC Controlled Wood Risk Assessments by FSC accredited National Initiatives, National and Regional offices).</p> <p>Subject to the specific conditions of each CW category, the division of a country into sub-national units (e.g. states, provinces) will only impact how a district is defined if those divisions result in increased heterogeneity of the level or type of risk that is assessed within them.</p>	

Code	INT-STD-40-005_10 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_06)
Requirement (s)	V2-1, Annex 1
Publication date	9 July 2014

Does the concept of ‘minimally disturbed by human economic activity’ in the definition of Intact Forest Landscape include fire suppression?

Regarding definition of Intact Forest Landscape, firefighting or prevention for the protection of public safety is not considered an economic activity. Fire control in the context of forest management activities is not considered to be an economic activity of minimal disturbance.

Code	INT-STD-40-005_12 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_08)
Requirement (s)	V2-1, Annex 2
Publication date	9 July 2014
<p>Is a CoC-certified harvesting company that DOES NOT own or manage the forest required to conduct a nature value assessment when conducting a risk assessment according to Annex 2 of FSC-STD-40-005, when a nature value assessment is required by the respective National Forest Stewardship Standard?</p> <p>No, a company that is conducting a risk assessment according to Annex 2 of FSC-STD-40-005 (V2-1) is not required to perform a nature value assessment, unless it is required by an approved national guidance as per Annex 2, part A, Clause 2 of FSC-STD-40-005 and/or as per FSC-DIR-40-005-09, Clause 3 (Advice).</p>	

Code	INT-STD-40-005_07
Requirement (s)	V2-1, Annex 2, part B, Section 2
Publication date	9 July 2014
<p>How should a risk assessment be conducted following Clause 2.5 when ILO 169 is not ratified?</p> <p>The standard does not refer to the ratification of ILO 169 and a risk assessment shall involve an assessment of evidence of violation of ILO requirements, irrespective of whether they have been ratified by the country in which the risk assessment is made.</p>	

Code	INT-STD-40-005_03
Requirement (s)	V2-1, Annex 2 and 3.
Publication date	4 May 2012
<p>Can wood from plantations converted to non-forest use be acceptable according to Category 4 of CW Standard FSC-STD-40-005?</p> <p>Yes, wood from plantations converted to non-forest use is acceptable according to Category 4 of FSC-STD-40-005.</p>	

Code	INT-STD-40-005_01
Requirement (s)	V2-1, Annex 2, A.3
Publication date	8 December 2011
<p>What is the definition of FMU in FSC terms and does this definition count for all references to FMU in FSC Standards, including Controlled Wood?</p> <p>Yes, the definition of FMU is the same for all references in FSC Standards, including Controlled Wood.</p> <p>Forest Management Unit (FMU):</p> <p>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.</p> <p>The term 'management plan' is key and taken as equivalent to that which is described in FSC Principle 7.</p>	

Code	INT-STD-40-005_17
Requirement (s)	V2-1, Annex 3
Publication date	28 October 2014
<p>If a company risk assessment or applicable National Risk Assessment concludes 'unspecified risk' for a district and then field verification at the forest level by a company implementing Annex 3 concludes 'low risk', is it possible to use the outcomes from the field verification as a source of information/evidence in the risk assessment to conclude low risk at the level of the whole district?</p> <p>No, the field verification according to Annex 3 allows the verification of risk at the FMU level. The confirmation of low risk at the FMU level cannot be extrapolated to the district level.</p>	

Code	INT-STD-40-005_02 (also published under FSC-STD-30-010 with code INT-STD-30-010_01)
Requirement (s)	V2-1, Annex 3
Publication date	31 January 2012
<p>Within a National Initiative "unspecified risk" category, is it possible for a company to classify a smaller district as "low risk"?</p> <p>No, unless done at the FMU level through the process described in Annex 3 of FSC-STD-40-005. According to this standard, where national or regional interpretation or guidance relating to Annex 2 has been provided by an FSC accredited National Initiative, this interpretation shall prevail.</p> <p>Other option would be that the Forest Manager got certified according to FSC-STD-30-010.</p>	

Code	INT-STD-40-005_19
Requirement (s)	V2-1, Annex 4
Publication date	2 July 2015
<p>An FSC Chain of Custody (CoC) certified manufacturer is making furniture (final product) for sale to a large international retailer that does not hold a CoC certificate. According to FSC-STD-40-005 V2-1, Annex 4, Clause 1.4, the CoC certified manufacturer cannot make a Controlled Wood claim on sales documentation for the furniture, since the retailer does not hold a CoC certificate.</p> <p>Is there any claim or statement that the CoC company can make on or off product? Such a claim or statement may be asked for, for example, by retailers with responsible procurement policies or by importers wanting to meet legality legislation.</p> <p>No. FSC certificate holders are not allowed to promote Controlled Wood products or to make FSC Controlled Wood claims on sales documents issued to non-FSC certified customers.</p>	

FSC-STD-40-005 (V3-0 and V3-1) REQUIREMENTS FOR SOURCING FSC CONTROLLED WOOD

Code	INT-STD-40-005_20
Requirement (s)	V3-0
Publication date	03 June 2016
<p>The revised FSC-STD-40-005 V3-0 does no longer include requirements regarding sales claims related to FSC Controlled Wood (CW) as previously included in Annex 4 of FSC-STD-40-005 V2-1. Does this mean that these requirements are no longer valid when implementing FSC-STD-40-005 V3-0?</p> <p>No, the requirements included in Annex 4 of FSC-STD-40-005 V2-1 are still valid as they are already covered by other normative documents:</p> <ol style="list-style-type: none"> 1. The requirements for use of FSC trademarks for the promotion of FSC Controlled Wood (Clauses 1.1, 1.2, 1.3, 1.6, 1.9 and 1.10 of FSC-STD-40-005 V2-1 Annex 4) are covered by Clause 1.4 of FSC-STD-50-001 V1-2. The reference to FSC-STD-40-005 V2-1 Annex 4 shall be interpreted as the reference to this interpretation. Organizations supplying FSC Controlled Wood may use the statement “FSC Controlled Wood” as segregation mark during manufacturing or transportation processes or storage. The segregation marks shall always be accompanied by the FSC controlled wood certificate code issued by the certification body. Segregation marks with the statement “FSC Controlled Wood” shall be removed/deleted if products are reaching final points of sale and/or when the segregation marks could be interpreted as commercial labels. 2. The requirements for sale of finished products as FSC Controlled Wood and sale of FSC Controlled Wood to non-FSC certificate holders (Clause 1.4 of FSC-STD-40-005 V2-1 Annex 4) are covered by footnote 4 of FSC-STD-40-004 V2-1. The term “trading” in the footnote shall be read as “commercialization”. The footnote is applicable to all FSC certificate holders, not only to traders. The reference to FSC-STD-40-005 V2-1 in the footnote shall be interpreted as the reference to this interpretation. 3. The requirement for translation of the FSC Controlled Wood claim on sales and delivery documents (Clause 1.5 of FSC-STD-40-005 V2-1 Annex 4) is covered by INT-STD-40-004_07. 4. The requirements for identification of sales documents of FSC Controlled Wood (Clauses 1.7, 1.8 and 1.10 of FSC-STD-40-005 V2-1 Annex 4) are covered by Clause 6.1.1 f, 6.1.1 g of FSC-STD-40-004 V2-1. 	

Code	INT-STD-40-005_31 (also published under FSC-STD-20-011 with code INT-STD-20-011_21)
Requirement (s)	V3-1, Clause 2.1 FSC-STD-20-011V4-2, Table B
Publication date	04 April 2024

Does the organization need to review potential suppliers not currently included in their DDS as part of the summary of the findings for field verification?

If the organization chose to exclude sites at the risk assessment stage, there is no requirement under FSC-STD-40-005 V3-1 to include this information in the summary of the DDS. Potential suppliers are not yet a part of the DDS. However, if field verification undertaken as a control measure resulted in one or more supply units, suppliers or sub-suppliers being excluded from the organization's DDS, this should be stated in the summary of the organization's findings required by FSC-STD-40-005 V3-1 sub-clause 6.2(d), as this is effectively a control measure taken to address identified risk.

Code	INT-STD-40-005_27
Requirement (s)	V3-1, Clause 4.1
Publication date	02 December 2020
<p>When FSC CW Risk Assessments have recommended and/or mandatory control measures (CMs) that do not address all the specified risks identified in the Risk Assessment, would it be sufficient for the organization to only include those recommended or mandatory control measures in its Due Diligence System (DDS)?</p> <p>No. Control measures (CMs) provided in FSC Risk Assessments (recommended or mandatory) may not always be sufficient to adequately mitigate or avoid all types of risks included in the risk assessments. This may be because either</p> <ul style="list-style-type: none"> a) There are no CMs to mitigate particular risks in specific situations, or b) the CMs provided in the FSC Risk Assessments are insufficient to mitigate or avoid the risk they are intended to mitigate or avoid. <p>In such situations, organizations shall establish and implement additional CMs to mitigate risks where required. Control measures established by the organization shall adhere to requirements 4.2 - 4.11 and 4.13 of FSC-STD-40-005 V3-1.</p>	

Code	INT-STD-40-005_30
Requirement(s)	V3-1, Clause 4.1
Publication date	28 March 2023
<p>To what extent must auditors further verify or corroborate expert opinions and statements? Is it necessary to additionally audit the evidence upon which conclusions of experts are based?</p> <p>No. Experts that meet the requirements of Annex C are deemed as sufficiently qualified to provide opinions/statements regarding the status of risk for controlled wood indicators. It is therefore not necessary to provide additional detailed corroborating evidence to the auditor that support the expert's conclusions.</p>	

However, if an auditor deems a statement provided by an expert to be unreasonable or comes across information contradicting the expert's conclusions, then additional corroborating evidence should be reviewed, and a non-conformity related to expert engagement may have to be issued.

Code	INT-STD-40-005_34
Requirement (s)	V3-1, Clause 4.1, 4.12, 4.13 ADVICE-40-005-27
Publication date	01 July 2024
<p>Clauses 4.12 and 4.13 describe the requirements for <u>mandatory</u> 'mitigation measures' (former 'control measures') in an NRA. But how should <u>recommended</u> mitigation measures provided in FSC Risk Assessments be implemented?</p> <p>The organization should implement the recommended mitigation measures where indicated in the applicable approved FSC Risk Assessment developed according to <<u>FSC-PRO-60-006b Risk Assessment Framework</u>>.</p> <p>Where alternative mitigation measures are used instead of recommended mitigation measures, the requirements in Clause 4.13 b) applies to the organization.</p> <p>Conversely to mandatory mitigation measures, the organization is not required to inform the responsible body (for the development of the FSC Risk Assessment) if alternative mitigation measures are used.</p> <p>NOTE: The term 'should' in this interpretation follows the definition provided in the box 'verbal forms for the expression of provisions' of <<u>FSC-STD-40-005 V3-1 Requirements for Soucign FSC Controlled Wood Standard</u>>.</p>	

Code	INT-STD-40-005_33 (also published under FSC-STD-20-011 V4-2 with code INT-STD-20-011_39 and FSC-DIR-40-005 with code INT-DIR-40-005_14)
Requirement(s)	V3-1, clause 4.14 FSC-STD-20-011 V4-2, clauses 6.2 and 6.17 ADVICE-40-005-24
Publication date	04 April 2024
<p>Are certificate holders required to verify the effectiveness/adequacy of the control measures (CMs) in Category 3 and 4 of the US NRA when controlling materials from areas of specified risk?</p> <p>No. The certificate holders sourcing material from areas of specified risk and implementing mandatory control measures based on the US National Risk Assessment (NRA) are not required to verify the effectiveness/ adequacy of the control measures in Category 3 and 4.</p> <p>However, certificate holders must document the data/ information related to the implemented measures. In order to achieve the intended goals outlined in the relevant US NRA Controlled Wood Regional Meeting Report as per <<u>FSC-NRA-US V1-0 FSC National Risk Assessment for the conterminous United States of America</u>>, the certificate holders should also provide this information to their certification body upon request.</p>	

Code	INT-STD-40-005_21
Requirement (s)	V3-1 Clause 4.8, Annex B clause 1.2
Publication date	16 January 2018
<p>Is the organization required to undertake stakeholder consultation in advance of each and every forest management activity covered by the DDS, as per Annex B, Clause 1.2 (FSC-STD-40-005 V3-1)?</p> <p>No, the organization is not expected to conduct stakeholder consultation in advance of each and every forest management activity. The frequency of the consultations needs to occur at a rate adequate and proportionate to the risk caused by the management activity and shall be defined by the organization.</p>	

Code	INT-STD-40-005_28
Requirement (s)	V3-1, Clause 4.9
Publication date	02 December 2020
<p>When an organization is using an FSC Risk Assessment that includes recommended, mandatory, or both recommended and mandatory control measures (CMs) for specified risk in Category 2, Category 3, or both, do they still need to use the opinion of experts to justify the adequacy of the control measures?</p> <p>No. If an organization is implementing the recommended or mandatory control measures (CMs) for Controlled Wood categories 2 and 3 from the applicable FSC Risk Assessment, then it does not need to use the opinion of experts to justify the adequacy of the CMs. This is because the CMs were developed with the involvement and consideration of experts in the FSC Risk Assessment process.</p> <p>NOTE: Clause 4.9 is only applicable in the following situations:</p> <ol style="list-style-type: none"> 1. an organization is using an Extended Company Risk Assessment (ECRA), or 2. an organization is using an NRA/CNRA that has not yet been approved by FSC, or 3. an organization is using a CNRA that does not state that they are following the FSC-PRO-60-002 and/or does not include the experts consulted, or 4. an organization chooses requirement 4.13 to develop their own control measures. 	

Code	INT-STD-40-005_29
Requirement (s)	V3-1, Clause 4.9 and 4.11.d)
Publication date	23 September 2022

1) Is applying legislation a valid control measure confirming evidence of local communities and Indigenous Peoples engagement and that their requirements are met?

2) Does the sentence “evidence confirming that local communities and Indigenous Peoples are engaged, and their requirements are met” mean that:

a) Local communities and Indigenous Peoples are either included in the development of the control measures, or;

b) Control measures always include interaction with local communities and Indigenous Peoples?

1) If the legislation requires the engagement of local communities and Indigenous Peoples and requires that their needs are met, then applying that legislation may be a valid control measure.

Regardless of whether legislation is being applied or not, the evidence must exist to demonstrate that local communities and Indigenous Peoples have accepted such engagement and that the result of the engagement meets their requirements.

2) Neither are required under all circumstances.

The sentence means that either:

1) The organization shall develop and implement control measures that lead to engagement and meeting the needs of local communities and Indigenous Peoples; or

2) The organization shall develop and implement control measures that find evidence that the local communities and Indigenous Peoples are engaged, and evidence that their requirements are met.

In case 1, the organization is generating the evidence confirming engagement and requirements being met. The frequency and timing of the engagement shall be adapted to ensure that the engagement on the needs and requirements is appropriate and that the needs of the local communities and Indigenous Peoples are met. It does not always mean that local communities and Indigenous Peoples are involved in the development of the control measures.

In case 2, the organization is gathering evidence that local communities and Indigenous Peoples are engaged, and their needs met by another relevant entity (e.g., local government).

NOTE: Clause 4.9 is relevant for justifying the adequacy of the control measures (whether implementing legislation or not). This includes assessing the sufficiency of the engagement and the means to meet the requirements of local communities and Indigenous Peoples.

Code	INT-STD-40-005_22
Requirement (s)	V3-1, Annex A, Controlled Wood Category 3 Clause 3.9 Indicator 3.2
Publication date	16 January 2018

When the organization conducts stakeholder consultation to demonstrate that there is significant support to low risk designation by relevant national/regional stakeholders from the assessed supply area, consulted stakeholders may not respond. Can a lack of response to stakeholder consultation demonstrate evidence of significant support?

No, the lack of a response to stakeholder consultation cannot be considered as evidence for significant support. Support to a low risk designation needs to be demonstrated by an affirmative and positive response from the stakeholders.

Code	INT-STD-40-005_26
Requirement (s)	V3-1, Annex A, Clause 3.9 Indicator 3.2d
Publication date	16 January 2018

What constitutes a ‘substantial objection’ from relevant national or regional stakeholders against a low risk designation according to FSC-STD-40-005 V3-1 Annex A, Clause 3.9, Indicator 3.2d?

A ‘substantial objection’ against a low risk designation shall be expressed as an objection and specifies a ‘threat’ caused by forest management activities to the HCV(s). Verifiable evidence or reference to such shall be provided in the objection.

Code	INT-STD-40-005_23
Requirement (s)	V3-1, Annex A
Publication date	16 January 2018

FSC-STD-40-005 V3-1 Annex A Controlled Wood Category 3 Clause 3.9 (Examples of sources of information Indicator 3.1) reads:

‘Forest, woodland, or mangrove ecoregions identified by World Wildlife Fund as a Global 200 Ecoregion and assessed by WWF as having a conservation status of endangered or critical. If the Global 200 Ecoregion comprises more than a single terrestrial ecoregion, an ecoregion within the Global 200 Ecoregion can be considered low risk if the sub-ecoregion has a Conservation Status other than ‘critical’ or ‘endangered’ (www.worldwildlife.org/science/wildfinder).’

The use of the word “and” has limited the requirement to Global 200 ecoregions which are also assessed by WWF as having a conservation status of endangered or critical. Otherwise the word “or” would have been used. Therefore, does a region that has been evaluated by WWF as critically endangered no longer needs to be considered as potentially HCVF, unless it is also a Global 200 Region.

The standard requires consideration of ‘ecoregionally significant HCVs’ and does not limit the recognition of ecoregions to Global 200 ecoregions. General references provided in the standard direct to WWF sources without limitation to Global 200 ecoregions (FSC-STD-4005, Annex 1, definition of ecoregion). Therefore, information about threatened ecoregions other than the examples provided in

FSC-STD-40-005 V3-1 should be taken into account. The organization shall not ignore known and available sources of information in addition to the ones listed in normative documents.

Code	INT-STD-40-005_35 (also published under FSC-STD-40-004 with code INT-STD-40-004_71; FSC-STD-01-004 with code INT-STD-01-004_08)
Requirement (s)	V3-1, Annex A, Clause 3.6 FSC-STD-40-004, V3-1, Clause 6.1 FSC-STD-01-004 V1-0, Terms and Definitions; Clause 1.1.1 b) FSC-STD-01-001 V5-3, Criterion 1.5 FSC-STD-60-004 V2-1, Annex A
Publication date	1 July 2024
Is compliance with the relevant legislation of the country of production as per EUDR covered by FSC requirements?	
<p>Yes, for forest management certification, Principle 1 of the <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship> requires The Organization to comply with all applicable laws, regulations and nationally-ratified international treaties, conventions and agreements. The requirement for Free, Prior and Informed Consent for Indigenous Peoples is covered by Principle 3.</p> <p>Further details on the minimum list of applicable laws, regulations and nationally-ratified international treaties, conventions and agreements that Standard Developers have to include in the Forest Stewardship Standard is reflected in Annex A of <FSC-STD-60-004 International Generic Indicators>.</p> <p>For chain of custody, as per Clause 6.1 of the <FSC-STD-40-004 Chain of Custody Certification>, "the organization shall ensure that its FSC-certified and controlled wood products or timber products conform to all applicable timber legality legislation." It also further elaborates that trade and customs laws include: "bans, quotas and other restrictions on the export of timber products (e.g., bans on the export of unprocessed logs or rough-sawn lumber), requirements for export licences for timber and timber products, official authorisation that entities exporting timber and timber products may require and taxes and duties applying to timber product exports."</p> <p>For sourcing material without an FSC claim to be used as controlled material, the risk assessment indicators as per FSC-PRO-60-006b, as well as Annex A, Clause 3.6 of the <FSC-STD-40-005 Requirements for sourcing FSC Controlled Wood> requires the organizations to use the minimum list of applicable laws, regulations, nationally ratified international treaties, conventions, and agreements.</p>	

Code	INT-STD-40-005_25
Requirement (s)	V3-1, Annex B
Publication date	16 January 2018
Can an FSC network partner provide a stakeholder list to be used by organizations and certification bodies for stakeholder consultations?	
<p>Yes. An FSC network partner can develop a list of relevant stakeholders to be used by organizations and certification bodies for stakeholder consultations. The consent of the stakeholders for participating in consultations and for making their names public shall be obtained before their names are included in this list.</p> <p>The stakeholder list developed shall be for the purpose of guidance only, unless published in FSC-PRO-60-002b by FSC, in which case the list shall be mandatory in the certification process upon publication.</p>	

The list is not exhaustive and the organization is responsible for the identification of affected and interested stakeholders.

Code	INT-STD-40-005_32 (also published under FSC-STD-20-011 with code INT-STD-20-011_22)
Requirement(s)	V3-1, Annex E FSC-STD-20-011 V4-2, Clause 7.2
Publication date	04 April 2024

If the organization develops a control measure based on a desk evaluation, can the certification body apply evaluation of control measures at the forest level if the examples in Annex E Table B suggest that a field-based control measure should have been developed?

FSC-STD-40-005 V3-1 Section 4 (Risk mitigation) does not specify the type of control measures that shall be established by the organization. FSC-STD-40-005 V3-1 Annex E is informative, and contains guidance and examples, not normative requirements. However, when field-based control measures have been designed by the certification body in the system for evaluating the relevance, effectiveness, and adequacy of the DDS, according to Clause 6.2, then the certification body can apply evaluation of the control measures at the field level.

Code	INT-STD-40-005_24 (also published under FSC-STD-30-010 V2-0 with code INT-STD-30-010_11)
Requirement (s)	V3-1
Publication date	16 January 2018, amended on 02 September 2021

In the CW/FM standard, under High Conservation Value Forests (HCVFs), what is the definition of ‘old-growth forest’ in the Australian context? What is the minimum area for determination of ‘old-growth forest’?

FSC-STD-AUS-01-2018 *FSC National Forest Stewardship Standard of Australia* and the Australian *The High Conservation Values (HCVs) Evaluation Framework - For the use of implementing Controlled Wood standards* Version 2-0 (2021) have defined ‘old-growth forest’ as:

“Ecologically mature forest where the effects of disturbances are now negligible.”

Where ‘mature forest’ is defined as:

“forests that contain overstorey trees typically greater than 100 years old and beginning to develop structural features typically found in older forests, including large spreading crowns, tree hollows and stages of senescence.”

In addition, FSC-STD-AUS-01-2018 *FSC National Forest Stewardship Standard of Australia* has provided the following guidance:

“Identification and assessment of HCV 3.3 [old-growth forest] should include consideration of:

- d. The degree to which it is rare and/or threatened at a global, national or regional level

- e. Its distinctiveness in terms of size and quality (including stand structural characteristics and ecological functions) in a landscape level context
- f. Geographic range.

Determining these shall be based on assessments by government agencies, peer reviewed literature, or assessments by recognised experts, and be considered at the landscape level.“

In the absence of a specific definition of old-growth forest in FSC-STD-30-010 V2-0 *FSC Controlled Wood Standard for Forest Management Enterprises* , the above definitions and guidance shall be followed to identify and assess old-growth forest in the Australian context.

Regarding the minimum area for determining old-growth forest, the Australian *The High Conservation Values (HCVs) Evaluation Framework - For the use of implementing Controlled Wood standards* Version 2-0 (2021) states that “The minimum area for Old Growth is as per the definition for Minimum Threshold for HCV Areas.”

Where the definition of ‘minimum area threshold for HCV Areas’ specifies that “In the identification of HCV Areas, the minimum size threshold will be the smallest area in which the viability and integrity of that particular designation can be maintained, based on the best available scientific information, including recognised government and expert definitions and research.”

DIRECTIVES

FSC-DIR-40-005 FSC DIRECTIVE ON FSC CONTROLLED WOOD

Code	INT-DIR-40-005_02 (also published under FSC-STD-40-005 with code INT-STD-40-005_04 and under FSC-STD-20-011 with code INT-STD-20-011_07)
Requirement (s)	Applies to all requirements where the CPI is mentioned
Publication date	6 September 2013
<p>In 2012 the Corruption Perception Index (CPI) changed from a scale of 0-10 to a scale of 0-100. Shall the new 0-100 CPI scale be implemented in FSC normative documents that currently still reference the previous 0-10 scale system?</p> <p>Yes, CPI references in FSC normative documents using the 0-10 scale system shall be converted to the new scale.</p> <p>A reference to a CPI index threshold '5' based on the old scale system becomes a CPI index '50' applying the new scale.</p>	

Code	INT-DIR-40-005_04 (also published under FSC-STD-40-005 with code INT-STD-40-005_15)
Requirement (s)	ADVICE-40-005-01
Publication date	9 July 2014
<p>How should companies treat ecoregions that are not within the WWF Global 200 but are listed as 'critical/endangered' or 'threatened' by WWF? Should this information always be included in risk assessments, under 3.1?</p> <p>The standard requires consideration of 'ecoregionally significant HCVs' and does not limit the recognition of ecoregions to Global 200 ecoregions. General references provided in the standard direct to WWF sources without limitation to Global 200 ecoregions (FSC-STD-40-005, Annex 1, definition of ecoregion). Therefore, information about threatened ecoregions other than the examples provided in FSC-STD-40-005 and FSC-DIR-40-005 should be taken into account. The company shall not ignore known and available sources of information in addition to the ones listed in normative documents.</p>	

Code	INT-DIR-40-005_06 (also published under FSC-STD-40-005 with code INT-STD-40-005_10)
Requirement (s)	ADVICE-40-005-01
Publication date	9 July 2014

Does the concept of ‘minimally disturbed by human economic activity’ in the definition of Intact Forest Landscape include fire suppression?

Regarding definition of Intact Forest Landscape, firefighting or prevention for the protection of public safety is not considered an economic activity. Fire control in the context of forest management activities is not considered to be an economic activity of minimal disturbance.

Code	INT-DIR-40-005_11 (also published under FSC-STD-40-005 with code INT-STD-40-005_16)
Requirement (s)	ADVICE-40-005-04
Publication date	10 October 2014

If a certified company sources material that has previously been FSC certified or covered by another company’s FSC Controlled Wood verification program but has since been traded by a non-certified company (therefore breaking the Chain of Custody), can this material be considered controlled with-out conducting a full verification program and risk assessment?

For previously FSC-certified material from a broken Chain of Custody to be considered as FSC Controlled Wood, the company must trace the material back to the certified company that traded it to the non-certified company where the Chain of Custody was broken, and conduct an audit of the supply chain. This audit shall demonstrate with verifiable documentation that the material is identifiable and traceable and has not been mixed with uncontrolled material.

For previously controlled material from a broken Chain of Custody to be considered as FSC Controlled Wood, the district of origin must be determined within/through the company’s own Controlled Wood verification program, for which all relevant normative requirements apply. For this purpose, risk assessments performed by other entities (e.g. a supplier with a valid FSC certificate that includes FSC Controlled Wood in its scope that sold FSC Controlled Wood (without a claim) to a non-certified entity) may be used as additional sources of information.

Code	INT-DIR-40-005_12 (also published under FSC-STD-40-005 with code INT-STD-40-005_18)
Requirement (s)	ADVICE-40-005-07
Publication date	28 October 2014

Shall the outcomes of a company verification program according to Annex 3 be made publicly available?

No, currently there are no requirements for publishing the outcomes of verification according to Annex 3. The standard does not limit such an opportunity, however.

Code	INT-DIR-40-005_05 (also published under FSC-STD-40-005 with code INT-STD-40-005_09)
Requirement (s)	ADVICE 40-005-07, ADVICE 40-005-02
Publication date	9 July 2014
<p>With regards to Category 3 (HCV), what is the minimal level of detail for describing the sourcing in the district of origin in the published company risk assessment? If the district of origin includes potentially controversial sources, when the company describes their sourcing in this area, must the description of their sourcing explicitly state that they are not sourcing from controversial FMUs in that district?</p> <p>The minimum required information to be included in the publicly available results of the risk assessment are provided in</p> <p>ADVICE 40-005-07 of FSC-DIR-40-005, which applies to all CW categories. In case of potentially controversial activities in FMUs located in a low risk district (See ADVICE 40-005-02 of FSC-DIR-40-005), a company should mention the existing FMUs with potential controversial activities in the publicly available results of a risk assessment.</p>	

Code	INT-DIR-40-005_03 (also published under FSC-STD-40-005 with code INT-STD-40-005_05)
Requirement (s)	ADVICE-40-005-07
Publication date	5 February 2014
<p>Which process shall be implemented if a certified FMU is under suspension in a district that has been designated as low risk for all CW categories either by a National Risk Assessment or by a COC Certificate Holder in their FSC Controlled Wood verification pro-gram when the COC Certificate Holder wants to source from this FMU?</p> <p>At the moment of suspension, the products sold by the certified FMU* are losing their FSC status. As the FMU is located in a designated low risk district for CW, the products may still be sourced as “controlled material” under the following conditions:</p> <ol style="list-style-type: none"> 1. As some or all CW categories may be affected by activities that led to the suspension of the FMU, the COC Certificate Holder shall review and if necessary, revise their risk assessment for the area of the suspended FMU. 2. The review/revision of the risk assessment shall be completed by the COC Certificate Holder within a period of two months from the date of suspension of the FMU certificate. 3. The COC Certificate Holder shall submit the reviewed/revise risk assessment to their CB for verification. 4. The reviewed/revise risk assessment shall be verified by the CB no later than one month after the COC Certificate Holder has submitted its reviewed/revise risk assessment, before it can be applied (see FSC-STD-40-005 V2-1 Clause 11.1). 	

5. As the whole district is considered low risk, the products sourced from the suspended FMU are considered controlled until the verification of the reviewed/revised risk assessment is completed by the relevant CB.
6. The outcome of the review/revision process including verification by the relevant CB will then determine the risk designation for the suspended FMU.
7. Material sourced from the area shall be classified as unspecified risk, if the timelines of review/revision and verification of the risk assessment (2, 4) is not met.

* According to the standard FSC-STD-01-001 or FSC-STD-30-010

Code	INT-DIR-40-005_01
Requirement (s)	ADVICE-40-005-07
Publication date	16 July 2010
<p>In the previous FSC-ADV-40-016, section C.1 stated that risk assessments must be made available in one of FSC's official languages. However, ADVICE-40-005-07 in FSC-DIR-40-005 the requirement to use one of FSC's official languages is not included. Can you confirm that an official FSC language is not required anymore for risk assessment public summaries?</p> <p>Yes, based on the current directive, risk assessment public summaries do not need to be posted in the FSC database in an official FSC language (English or Spanish).</p>	

Code	INT-DIR-40-005_13
Requirement (s)	ADVICE-40-005-09
Publication date	2 March 2015
<p>ADVICE-40-005-09 indicates that “Companies will have a period of up to 12 months after the approval date to align their controlled wood verification programs to the approved risk designation by a National Initiative.” In many cases, this means a company risk assessment that designated low risk now needs to be aligned with a National Risk Assessment that designates unspecified risk. In these cases, does the certificate holder need to implement field verification according to Annex 3 of FSC-STD-40-005 V2-1 for areas of unspecified risk prior to the one-year transition date?</p> <p>Yes. When risk designations by an FSC Network Partner are approved, the certificate holder shall update its risk assessment to the outcomes of the NRA. Field verification according to Annex 3 of FSC-STD-40-005 V2-1 shall be implemented for areas of unspecified risk after the risk assessment is updated and shall be completed prior to the one-year transition date (12 months after the date of the approval of the NRA).</p>	

Code	INT-DIR-40-005_08 (also published under FSC-STD-40-005 with code INT-STD-40-005_12)
Requirement (s)	ADVICE-40-005-09, Clause 3 (Advice)
Publication date	9 July 2014
<p>Is a CoC-certified harvesting company that DOES NOT own or manage the forest required to conduct a nature value assessment when conducting a risk assessment according to Annex 2 of FSC-STD-40-005, when a nature value assessment is required by the respective National Forest Stewardship Standard?</p> <p>No, a company that is conducting a risk assessment according to Annex 2 of FSC-STD-40-005 (V2-1) is not required to perform a nature value assessment, unless it is required by an approved national guidance as per Annex 2, part A, Clause 2 of FSC-STD-40-005 and/or as per FSC-DIR-40-005-09, Clause 3 (Advice).</p>	

Code	INT-DIR-40-005_10 (also published under FSC-STD-40-005 with code INT-STD-40-005_14)
Requirement (s)	ADVICE-40-005-17
Publication date	9 July 2014
<p>Can timber of unknown origin collected from beaches be evaluated according to the standard FSC-STD-40-005?</p> <p>No, timber collected from beaches is not eligible for evaluation under the FSC Controlled Wood Standard FSC-STD-40-005 V2-1.</p>	

Code	INT-DIR-40-005_09 (also published under FSC-STD-40-005 with code INT-STD-40-005_13)
Requirement (s)	ADVICE-40-005-18
Publication date	9 July 2014
<p>Can a district of origin cover more than one country? If so, is a separate risk assessment required for each country, given the heterogeneity in assessing risk between two different sets of laws? What about within countries where the sub-national units (states, provinces, etc.) have the independence to create their own resource use and protection laws?</p> <p>According to its definition, a 'district' is considered to be a generic geographical definition within a country. Subject to the above, various guidance and requirements are provided stating that how a district shall be established depends on the CW category under assessment. In the case of National Risk Assessments (NRAs) it is possible to develop shared NRAs for countries sharing homogenous conditions (e.g. sharing the same ecoregions), according to the procedure FSC-PRO-60-002 V2-0 (FSC Controlled Wood Risk Assessments by FSC accredited National Initiatives, National and Regional offices).</p>	

Subject to the specific conditions of each CW category, the division of a country into sub-national units (e.g. states, provinces) will only impact how a district is defined if those divisions result in increased heterogeneity of the level or type of risk that is assessed within them.

Code	INT-DIR-40-005_07 (also published under FSC-STD-40-005 with code INT-STD-40-005_11)
Requirement (s)	ADVICE-40-005-19
Publication date	9 July 2014
<p>In cases where there is an approved national risk assessment, is it acceptable for the certificate holder to use the National Risk Assessment to satisfy the controlled wood requirements for conducting a risk assessment as specified in FSC-STD-40-005 and FSC-DIR-40-005, rather than having to generate its own risk assessment?</p> <p>The use of approved National Risk Assessments (NRAs) for sourcing Controlled Wood according to FSC-STD-40-005 is mandatory. Certificate holders have different options for aligning their verification programs with the results of applicable NRAs. Certificate holders may, for example, use NRAs available on FSC’s website and/or the Global Forest Registry, or generate or update a new or existing company-developed risk assessment with the risk designation(s) provided in relevant NRAs. These examples are not exhaustive.</p>	

Code	INT-DIR-40-005_14 (also published under FSC-STD-20-011 V4-2 with code INT-STD-20-011_39 and FSC-STD-40-005 with code INT-STD-40-005_33)
Requirement(s)	ADVICE-40-005-24 FSC-STD-40-005 V3-1, clause 4.14 FSC-STD-20-011 V4-2, clauses 6.2 and 6.17
Publication date	04 April 2024
<p>Are certificate holders required to verify the effectiveness/adequacy of the control measures (CMs) in Category 3 and 4 of the US NRA when controlling materials from areas of specified risk?</p> <p>No. The certificate holders sourcing material from areas of specified risk and implementing mandatory control measures based on the US National Risk Assessment (NRA) are not required to verify the effectiveness/ adequacy of the control measures in Category 3 and 4.</p> <p>However, certificate holders must document the data/ information related to the implemented measures. In order to achieve the intended goals outlined in the relevant US NRA Controlled Wood Regional Meeting Report as per <FSC-NRA-US V1-0 FSC National Risk Assessment for the conterminous United States of America>, the certificate holders should also provide this information to their certification body upon request.</p>	



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