Interpretation

INTERPRETATIONS OF THE NORMATIVE FRAMEWORK

Chain of Custody

14/11/2025

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Title:	Interpretations of the Normative Framework
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TERMS AND DEFINITIONS

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.

ABBREVIATIONS

CAR	Corrective action request
CB	Certification body
CH	Certificate holder
CoC	Chain of Custody
DDS	Due diligence system
EMS	Environmental Management System
FM	Forest Management
FMU	Forest Management Unit
FSC	Forest Stewardship Council
NF	Normative Framework
NRA	National Risk Assessment
P&P	Policy and Performance Unit
QMS	Quality Management System

STANDARDS

FSC-STD-20-011 (V2-0) CHAIN OF CUSTODY EVALUATIONS

Code	INT-STD-20-011_04
Requirement(s)	V2-0, Clauses 2.7 and 8.4
Publication date	21 November 2013
Status	Withdrawn on 15 June 2020 and replaced by ADVICE-20-011_10

Code	INT-STD-20-011_09 (also published under FSC-STD-20-007 with code INT-STD-20-007_25)
Requirement(s)	V2-0, Clause 4.3.2
Publication date	19 May 2014
Status	Withdrawn

Code	INT-STD-20-011_05 (also published under FSC-STD-20-007 with code INT-STD-20-007_24)
Requirement(s)	V2-0, Clause 4.5
Publication date	20 February 2014
Status	Withdrawn

Code	INT-STD-20-011_08 (also published in FSC-PRO-20-003 with code INT-PRO-20-003_02)
Requirement(s)	V2-0, Clause 4.6
Publication date	19 May 2014
Status	Withdrawn

Code	INT-STD-20-011_10
Requirement(s)	V2-0, Clause 5.11
Publication date	13 January 2015

Status	Withdrawn

Code	INT-STD-20-011_07
Requirement(s)	V2-0, Clause 5.11
Publication date	13 May 2014
Status	Withdrawn

Code	INT-STD-20-011_06
Requirement(s)	V2-0, Clause 5.12
Publication date	11 April 2014
Status	Withdrawn

FSC-STD-20-011 (V3-0) CHAIN OF CUSTODY EVALUATIONS

Code	INT-STD-20-011_17
Requirement(s)	V3-0, Section 6, Note
Publication date	27 September 2016
Status	Withdrawn

Code	INT-STD-20-011_16 (replaced under FSC-STD-20-011 V4-1 with code INT-STD-20-011_32)
Requirement(s)	V3-0, Table B, Clause 2 e) and Footnote 6
Publication date	11 November 2016
Status	Withdrawn

FSC-STD-20-011 (V4-0) CHAIN OF CUSTODY EVALUATIONS

Code	INT-STD-20-011_18
Requirement(s)	V4-0, Section 6, Note
Publication date	27 September 2016
Status	Withdrawn

Code	INT-STD-20-011_23
Requirement(s)	V4-0, Clause 4.3.16
Publication date	01 August 2018
Status	Withdrawn

Code	INT-STD-20-011_20
Requirement(s)	V4-0, Clause 4.8, Clause 6.2
Publication date	16 January 2018
Status	Withdrawn

FSC-STD-20-011 (V4-1) CHAIN OF CUSTODY EVALUATIONS

Code	INT-STD-20-011_01
Requirement(s)	V4-1, Clause 1.1 d)
Publication date	15 April 2011
Status	Withdrawn

FSC-STD-20-011 (V4-2) CHAIN OF CUSTODY EVALUATIONS

Code	INT-STD-20-011_19
Requirement(s)	V4-2, Clauses 2.6 f) and 3.2
Publication date	15 March 2017
Status	Withdrawn

Code	INT-STD-20-011_15
Requirement(s)	V4-2, Terms and definitions 'Scope of Chain of Custody certificates'
Publication date	11 November 2016
An FM/CoC organization has sold standing trees to a CoC organization before the certification of the FM/CoC organization is suspended or expired. Is the CoC certificate holder allowed to harvest the trees and consider the logs as FSC-certified? No, once the FM/CoC certification is suspended or expired the forest stand loses the FSC status, even if it has been sold already. The harvesting of standing timber is only allowed if covered by a valid FM certification. Thus, the CoC certified organization, which has purchased the standing trees can not anymore claim the logs to be FSC certified.	

Code	INT-STD-20-011_14 (also published under FSC-PRO-20-001 with code INT-PRO-20-001_02)
Requirement(s)	V4-2, Sections 1 and 3
Publication date	28 April 2016; updated 13 September 2022
Shall the CB raise corrective action requests (CARs) to a CoC certificate holder (CH) if there is objective evidence for infringements of the Policy for Association?	

If the CB witnesses evidence of infringements of the FSC Policy for Association in the audit (FSC-PRO-20-001 V1-1 Section 1) or detects such evidence through other means such as by reviewing (evaluating) complaints, disputes or allegations of nonconformity received from stakeholders (FSC-STD-20-011-V4-1/V4-2 Clause 2.6 d)/2.6 e), the CB shall record the evidence for infringements in the audit report and alert FSC International about a potential non-compliance with the FSC Policy for Association for further evaluation.

The CB shall not raise CARs about infringements of the FSC Policy for Association to the CH as relevant conclusions are the subject matter of FSC International and require a decision by the international FSC Board of Directors.

If, however, the evidenced infringements of the Policy for Association also indicate nonconformities with applicable FSC certification requirements, the CB shall raise CARs accordingly.

Code	INT-STD-20-011_12 (also published under FSC-PRO-20-001 with code INT-PRO-20-001_01)
Requirement(s)	V4-2, Clause 2.6 e)
Publication date	11 February 2016; amended 28 April 2016; updated 13 September 2022

How are CBs required to verify that a certificate holder (CH) demonstrates its commitment to comply with the values of FSC as defined in the "Policy for the Association of Organizations with FSC" (FSC-POL-01-004)?

CBs have to verify (audit) the CH's commitment to comply with the values of FSC as defined in the Policy for Association according to FSC-STD-40-004 V3-1 Clause 1.3. This needs to be done by evaluating the existence of a self-declaration signed by the CH (FSC-PRO-20-001 V1-1 Section 3).

See also INT-PRO-20-001_02 for situations of evidenced infringements of the Policy for Association.

Code	INT-STD-20-011_13
Requirement(s)	V4-2, Clause 2.6 e)
Publication date	11 February 2016; amended 28 April 2016; updated 13 September 2022

Does the requirement per FSC-STD-20-011 4-2 Clause 2.6 e) to review "complaints, disputes, or allegations of non-conformities received by the organization and/or the certification body" also apply to those related to infringements of the Policy for Association?

Yes. Complaints, disputes, or allegations of nonconformity received from stakeholders have to be reviewed by the certification body in all cases according to FSC-STD-20-011 V4-2 Clause 2.6 e). Further evaluation is only required if the review indicates that there is:

a) evidence of nonconformities of the CH with any FSC certification requirements applicable to the scope of certification; or

b) a risk for nonconformities with applicable FSC certification requirements due to other activities of the organization (including non-certified entities or operations) that may affect the integrity of the chain of custody system, such as illegal timber trade, document forgery or product counterfeiting.

The CB shall record the complaint, dispute or allegation and any identified evidence for infringements of the Policy for Association in the audit or complaint investigation report and alert FSC International about a potential non-compliance with the FSC Policy for Association for further evaluation.

Code	INT-STD-20-011_28
Requirement(s)	V4-2, Clause 2.6 a) FSC-STD-20-001 V4-0 Clause 1.2.3 q)
Publication date	06 May 2019; amended 05 May 2021

1. Do CBs need to verify accounting records of non-FSC sales for the purpose of confirming information provided in sales documents and annual volume summaries?

2. What is the normative basis for CBs to assess these records?

1. CBs shall verify accounting records of non-FSC sales in the following situations during an annual evaluation:
   a. The CB received a complaint that leads to the suspicion of false claims, fraud or incorrectly declared FSC volumes.
   b. The CB auditor comes across evidence that leads to the suspicion of false claims, fraud or incorrectly declared FSC volumes (including at critical control points).
   c. The organization was part of a Transaction Verification data request since the last evaluation.
   d. The organization declared no sales and purchases of FSC material since the last evaluation.
   e. The organization waived the last evaluation.

NOTE: The above-mentioned situations are not exclusive and CoC auditors can review non-FSC sales in other situations also as deemed necessary.

2. The normative basis for requiring access to records of non-FSC sales is FSC-STD-20-001 V4-0 Clause 1.2.3 q).

Complaints received by the CH have to be reviewed in all cases according to Clause 1.2.3 for conformity with FSC-STD-20-001 V4-0. If they relate to nonconformity with applicable certification requirements in certified entities or operations, appropriate action must be taken by the CH and documented. Otherwise, similar considerations apply as provided under point 1) above.

Code	INT-STD-20-011_02
Requirement(s)	V4-2, Clause 2.6 f)
Publication date	23 April 2013, updated 13 September 2022

Is it acceptable to audit loggers through desk audit when the logger does not have a log yard to visit?

Yes. The desk audit is applicable to loggers holding a FSC Chain of Custody certificate and that do not have a log yard. The desk audit shall cover all applicable standard requirements of FSC-STD-40-004 V3-1, except the ones that only apply to COC certificates with physical possession of products, namely:

- V3-1, Clause 13.2, 2.5, 2.6, 2.7,4.1, PART II (10 Percentage system, 11 Credit system) and 13 Outsourcing

Evaluation against the standard requirements related to labeling of products are only required when the FSC label is used by the logger.

Code	INT-STD-20-011_44
Requirement(s)	V4-2, Clause 2.6 f) i
Publication date	19 March 2025

Is it possible to conduct a remote audit of an organization that is classified as a 'processor' but carries out all operations through an FSC-certified contractor, without taking physical possession of certified material?

Yes. If the organization transforms (e.g., processing, labelling, packaging, or repackaging) the material included in the scope of the certification through an FSC-certified contractor and the organization is not taking physical possession of the material at any stage, a remote audit may be conducted for all types of certification evaluations.

Physical inspection of such activities will be undertaken by the contractor's CB and the CoC management system of the organization can be audited remotely by the organization's CB.

Note: If the CB deems it impossible to evaluate all aspects of the CoC requirements (e.g., core labour requirements) remotely, then the evaluation needs to be conducted on-site.

Code	INT-STD-20-011_34 (also published under FSC-STD-40-004 V3-1 with code INT-STD-40-004_55)
Requirement(s)	V4-2, Clause 2.6 f) ii FSC-STD-40-004 V3-1, Clause 14.2 FSC-DER-2020-005
Publication date	30 June 2022

Under single CoC certification, if subsites do not have any purchase, processing, or sales function of their own but only provide logistical support, do they need to be evaluated as per the NOTE following Clause 14.2?

Yes, all subsites shall be evaluated for conformance with FSC-STD-40-004 requirements. Certification bodies can carry out desk audits or remote evaluations of certain subsites but shall conduct a physical inspection of these subsites at least once during the five-year duration of a certificate according to FSC-STD-20-011 V4-2, 2.6 f) ii.

Code	INT-STD-20-011_37 (also published under FSC-STD-40-004 with code INT-STD-40-004_47)
Requirement (s)	V4-2, Clause 2.6 e) FSC-STD-40-004 V3-1, Annex E, definition of 'Scope'
Publication date	30 June 2020; updated 04 May 2023

Can a CoC certificate holder (CoC-CH) include logging and harvesting activities (e.g., buying standing trees) under the scope of their chain of custody certification? Can they sell FSC-certified products?

Yes, a CoC certificate holder can include logging and harvesting activities under the scope of its chain of custody certification and sell FSC-certified forest products with FSC claims or use it as input for CoC-certified production or processes, provided that the certificate holder has the legal ownership of the timber at the time of harvest.

There are two main scenarios for a CoC-CH with logging and harvesting activities in the certification scope:

1) A logger is the CoC-CH and is buying and subsequently harvesting standing trees, regulated by a contract between the logger and the FM-certified Organization. The logger is taking legal ownership of FSC-certified material and therefore needs to be certified.
2) A timber trader or processor is the CoC-CH and is outsourcing the harvesting activities to a logger through an outsourcing agreement under the scope of certification. In this case, the logger does not take legal ownership of FSC-certified material and therefore does not need to be certified.

In both scenarios, the certification body of the CoC-CH shall visit log landings or timber storages if there is a risk that material from uncertified or uncontrolled sources could enter or where FSC certified or controlled material could leave the system (i.e., critical control points).

The FM-certified Organization is responsible for ensuring conformance of all activities within the certified MU with the applicable forest stewardship standard. This also refers to activities conducted by other persons or entities. It is the responsibility of the certification body of the FM-certified Organization to assure this conformance.

Code	INT-STD-20-011_30 (also published under FSC-STD-40-004 V3-1 with code INT-STD-40-004_50)
Requirement(s)	V4-2, Table B Clause 4 h) FSC-STD-40-004 V3-1 Clause 4.4
Publication date	02 December 2020; updated 13 September 2022

Can an organization that makes custom manufactured products (e.g., woodworkers, building contractors, construction companies) choose to not present volumes (e.g., in m^3) in their overview of job orders or construction projects?

Yes, organizations that make custom manufactured products may present the annual volume summary as an overview of the job orders or construction projects instead of by product group covering the previous reporting period and other requirements as specified in Clause 4.4.

When the organization is reporting only an overview of job orders or construction projects and not the annual volume summary, the certification body may meet the reporting requirements of FSC-STD-20-011 V4-1 and V4-2 PART III Table B Clause 4 h) by including the total number of jobs orders presented in the overview of custom projects.

Code	INT-STD-20-011_35
Requirement (s)	V4-2, Clause 2.6 i) ii.
Publication date	04 May 2023

For the transfer system, Certification Bodies shall confirm that FSC-certified outputs can be traced to certified inputs. Does the organization have to specify the exact input (e.g., batch number) corresponding to a specific output product?

No. The purpose of the requirement is to confirm the eligibility criteria for a product group or job order. Nonetheless, supporting evidence shall be provided by the organization for the certification body to assess conformity with Sections 3, 4 and 9 of FSC-STD-40-004 V3-1.

Code	INT-STD-20-011_43
Requirement(s)	V4-2, Clause 6.1
Publication date	12 February 2025

Is stakeholder consultation required when a certificate holder includes a new supply area in its DDS during the certification cycle that is unassessed or has a non-negligible risk (formerly 'specified risk') designation?

Yes. The certification body is required to conduct stakeholder consultation (in accordance with Clause 6.1), when the organization extends its DDS to a new supply area that is unassessed or has a non-negligible risk designation, including within the certification cycle.

The term 'first evaluation' referred in the Note under the subheading 'Stakeholder consultation' is to be understood as:

a) The organization's DDS is consulted for the first time, whether or not during the 'main evaluation' (see the types of evaluation under the 'Evaluation' definition in Annex E, <FSC-STD-20-011 V4-2 Chain of Custody Evaluations>);
b) The organization's DDS is extended to include for the first time a supply area that is unassessed or that has a non-negligible risk designation.

Code	INT-STD-20-011_39 (also published under FSC-DIR-40-005 with code INT-DIR-40-005_14 and FSC-STD-40-005 with code INT-STD-40-005_33)
Requirement(s)	V4-2, Clauses 6.2 and 6.17 ADVICE-40-005-24 FSC-STD-40-005 V3-1, clause 4.14
Publication date	04 April 2024

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?

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.

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.

Code	INT-STD-20-011_42
Requirement(s)	V4-2, Clause 6.2
Publication date	22 November 2024

If an FSC Risk Assessment differentiates the risk designation based on the actions implemented by the organization, shall such actions be classified in the due diligence system (DDS) as mitigation measures (formerly 'control measures') and evaluated according to the applicable requirements for mitigation measures?

Yes. The scope of the evaluation shall be designed to enable verification of the organization actions for their relevance, adequacy and effectiveness in mitigating the non-negligible risk (formerly 'specified risk').

Example:

Background information: The organization sources controlled material from areas in a country with 'non-negligible risk' (formerly 'specified risk') for indicators 3.1 and 3.3. According to the FSC Risk Assessment of this country, these areas are non-negligible risk unless the organization carries out a "pre-harvest nature value assessment" and has "effective policies not to source from Woodland Key Habitats (WKHs)". If these are in place, then the areas can be considered as 'negligible risk'.

Rationale and conclusion: Activities leading to negligible risk that are dependent on the actions of the organization are the same as mitigation measures. Therefore, it is of critical importance that such mitigation measures are verified according to the requirements in Section 4 of <FSC-STD-40-005 V3-1 Requirements for Sourcing FSC Controlled Wood Standard>.

Code	INT-STD-20-011_33
Requirement (s)	V4-2 clause 6.17 b); 6.19
Publication date	08 March 2022

Are mandatory control measures provided in a CNRA also subject to these requirements?

Yes. All control measures in NRAs and CNRAs (collectively called 'FSC risk assessments') are subject to the requirements identified above.

Code	INT-STD-20-011_40 Evaluation of recommended mitigation measures
Requirement (s)	V4-2, Clause 6.17, 6.19
Publication date	23 August 2024

Clauses 6.17 and 6.19 describe the requirements for the evaluation of mandatory 'mitigation measures' (former 'control measures') in an NRA. But how should recommended mitigation measures be evaluated?

The certification body is required to evaluate the implementation of recommended mitigation measures where such measures are provided in the applicable approved FSC Risk Assessment developed according to <FSC-PRO-60-006b Risk Assessment Framework>.

If the organization has replaced recommended mitigation measures with alternative mitigation measures, the requirements in Clause 6.19 a) apply to the certification body.

Code	INT-STD-20-011_22 (also published under FSC-STD-40-005 with code INT-STD-40-005_32)
Requirement(s)	V4-2, Clause 7.2 FSC-STD-40-005 V3-1 Annex E
Publication date	16 January 2018; updated 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-20-011_26
Requirement(s)	V4-2, Clause 7.5 a)
Publication date	02 April 2019; updated 13 September 2022

The Central Office of a group CoC certificate included new sites to the certificate scope within the approved annual growth rate in the period between two certification body's evaluations. Considering that all new sites have the same risk, how should them be sampled by the certification body at the next surveillance evaluation?

The sites that have been incorporated into the certificate scope in the period between the certification body's evaluations shall be sampled together with the sites that were already in the scope at the previous evaluation.

Code	INT-STD-20-011_11
Requirement(s)	V4-2, Clause 8.1

Publication date	05 October 2015; updated 13 September 2022

FSC-STD-40-007 V2-0 Clause 4.1 sets out the sampling rate for organizations to apply when performing on-site audits of their suppliers included in their Supplier Audit Program. FSC-STD-20-011 V2-0 Clause 7.1 then defines the calculation for CBs to apply when selecting from those audited suppliers.

In cases where the organization voluntarily decides to conduct a higher number of on-site audits of their suppliers than required, is it acceptable for the CB to calculate their sample size on the minimum number required rather than the actual number of suppliers visited by the organization?

FSC does not want to discourage organizations from electing to sample suppliers at higher rates.

It is acceptable for the CB to base their sample size on the minimum number required to be included in the supplier site audits as per FSC-STD-40-007 V2-0 Clause 4.1, provided that the CB has analyzed the reason(s) given by the organization for extending the sampling rate within their Supplier Audit Program and the CB has come to the conclusion that the minimum sampling rate is sufficient.

Code	INT-STD-20-011_27
Requirement(s)	V4-2, Table A. Matrix for determination of R (risk index)
Publication date	02 April 2019

When should certification bodies select the option "*Audit for inclusion of new participating sites in the certificate*" for calculating the Risk Index according to Table A of FSC-STD-20-011?

This option shall be selected when the certification body conducts audits between main-evaluations, surveillance evaluations and re-evaluations with the purpose of approving the inclusion of new sites in the scope of group CoC certificates.

Code	INT-STD-20-011_03
Requirement(s)	V4-2, Clause 9.2 e)
Publication date	29 May 2013; updated 13 September 2022

FSC considers outsourcing across national borders to countries with Corruption Perception Index (CPI) lower than 50 as high-risk activity. If a company based in China establishes an outsourcing agreement with another company situated in Hong Kong, is this situation considered as cross-border outsourcing?

Recognizing that Hong Kong is a Special Administrative Region of the People's Republic of China, FSC does not consider the outsourcing activity of a company based in Hong Kong to a company based in mainland China to be cross-board outsourcing in the context of FSC-STD-20-011 V4-1/V4-2 Clause 9.2 e).

Code	INT-STD-20-011_31

Requirement (s)	V4-2, Clause 10.2 a)
Publication date	02 December 2020; updated 13 September 2022

How shall certification bodies record information on organizations with no FSC sales since the last evaluation on the FSC database?

In case an organization has not declared any FSC sales since the last evaluation, the certification body shall record this information in the FSC database in Salesforce in the following manner:

1. In the Transaction Verifications Finding Detail section, under the item 'Finding', the certification body shall select the 'No Sales reported (10.2 a)' from the drop-down menu.
2. In the field 'finding date', the certification body shall enter the date of the formal presentation of the audit finding.

Code	INT-STD-20-011_36 (also published under FSC-STD-40-004 with code INT-STD-40-004_61)
Requirement (s)	V4-2, Clause 11.2 FSC-STD-40-004 V3-1, Clause 1.5
Publication date	04 May 2023

Is it required to have a policy statement in the local language of the area in which the organisation or site is located?

Yes. To be "made available to stakeholders", the policy statement shall be readable by workers. This requires use of the local language. In areas with more than one local language, this means that the policy statement will need to be available in those languages.

Consideration shall also be given to the languages of contractors and sub-contractors.

Code	INT-STD-20-011_38
Requirement (s)	V4-2, Clause 12.1, Table B. 2.f) iv.
Publication date	25 March 2024

Is the "size class" equivalent to the "AAF Class" for the purposes of the minimum content of evaluation reports?

Yes, 'size class' is equivalent to 'AAF Class' in FSC-POL-20-005.

With reference to Table 2 in Annex 2 of FSC-POL-20-005 V3-4, the Forest Product Turnover (FPT) figure may be included in lieu of 'size class' by the certification body in the 'minimum content required' in the certificate scope information part of the evaluation report.

Code	INT-STD-20-011_24
Requirement (s)	V4-2, Clause 12.1, Table B. 4.c)

Publication date	21 September 2018; updated 13 September 2022

What is the definition of "evaluation findings" as included in evaluation reports?

Evaluation findings are defined as results of the evaluation of the collected audit evidence against audit criteria and can thus indicate conformity or nonconformity. Audit evidence consists of records, statements of fact or other information relevant to the audit criteria and is verifiable. Audit reports for chain-of-custody shall include systematic presentation of findings rather than simply evidence. Findings demonstrating conformity shall include a description of how conformity is achieved or maintained.

Code	INT-STD-20-011_25
Requirement (s)	V4-2, Clause 12.1, Table B. 4.c)
Publication date	21 September 2018; updated 13 September 2022

Is it acceptable that CBs summarize the systematic presentation of findings demonstrating conformity or nonconformity of certificate holders in CoC audits?

Yes, summaries are acceptable, as long as the critical control points are addressed, and conformity with the standard sections indicated in bold is summarized in a way that allows the decision-making entity to make an informed decision on the overall conformity or non-conformity of the implemented system.

Code	INT-STD-20-011_29
Requirement (s)	V4-2, Clause 13.4 a) and Table B. 7 b)
Publication date	02 December 2020; updated 13 September 2022

1. Does the CB certification summary need to include the full summary of the organization's DDS?

2. Does the organization's DDS summary need to be translated into English and Spanish in the certification summary?

1. No, the certification summary does not need to include the full summary of the organization's DDS. The certification summary shall include information made publicly available by the organization, or references to such (according to Section 6 of FSC-STD-40-005). This information shall be available for the period of validity of the certificate.

NOTE 1: References to other locations (i.e., annexes or URLs) may replace the publicly available information in the certification summary.

NOTE 2: The inclusion of confidential information is not required.

2. When an organization's certificate covers a total supply area of more than 50,000 ha, the certification summary shall be translated to English or Spanish. Annexes or online sources that are referenced in the certification summary may also be translated to English or Spanish.

Code	INT-STD-20-011_21 (also published under FSC-STD-40-005 with code INT-STD-40-005_31)

Requirement (s)	V4-2; Table B FSC-STD-40-005 V3-1, Clause 2.1
Publication date	16 January 2018; updated 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-20-011_32
Requirement (s)	V4-2, Table B, Clause 2 f) and Footnote 9
Publication date	11 November 2016 amended on 02 December 2020; updated 13 September 2022

Shall Certification Bodies list all sub-sites of Single CoC certificates in the FSC database of certificates? Is it possible to list sub-sites of Single COC certificates into the FSC database?

No. In the case of Single CoC certificates, only the main site that holds the FSC chain of custody certificate shall be listed in the FSC database (info.fsc.org). Only participating sites of Multi-site and Group CoC certificates shall be listed in the FSC database.

However, certification bodies may list the sub-sites of single CoC certificates in a PDF document uploaded on the FSC database in cases where the physical address (sub-site) differs from the legal address (registration address) of the organization.

Code	INT-STD-20-011_41
Requirement (s)	V4-2, Clause 12.1, Table B, item 3 b)
Publication date	23 August 2024

How should 'auditor qualifications' be interpreted in the context of the minimum content of evaluation reports?

Auditor qualification' is not a defined term in the FSC normative framework, but based on Annex 2, Tables 2 and 3 of <FSC-STD-20-001 V4-0 General requirements for FSC accredited certification bodies> it refers to: education and professional experience; initial and ongoing training; performance evaluation. The CB is required to record this information (Section 2.4, and Clause 3.1.10 of FSC-STD-20-001 V4-0), as part of their management system.

For this reason, the CB is not required to include such information in the evaluation report, and in this context 'auditor qualification' should be interpreted as the auditor's role in the audit team (e.g., audit team leader, auditor in training).

FSC-STD-40-003 (V2-1) CHAIN OF CUSTODY CERTIFICATION OF MULTIPLE SITES

Code	INT-STD-40-003_05
Requirement (s)	V2-1, Clause 5.3.5
Publication date	20 March 2020, updated 28 October 2021 Effective from the date of publication until 30 April 2023
Statues	Withdrawn

Code	INT-STD-40-003_01
Requirement (s)	V2-1, Clause 3.1
Publication date	23 November 2011; Updated 07 December 2023

In case a Participating Site of a Group CoC certification no longer meets the applicable eligibility criteria for group membership while at the same time the relevant FSC Network Partner has applied for nationally adapted eligibility criteria by which the participating site would still be eligible, would this allow the participating site to stay within the group beyond the defined transitional membership phase?

Yes, in this case the transitional status of the Participating Sites can be extended by the Central Office by another 12 months. The extension will expire after the 12 months' timeline or at the time when FSC has decided on the proposal for nationally adapted eligibility criteria, whichever happens first.

Additionally, FSC International considers the submission of all the documents listed below, as the official start of the FSC Network Partner's application for nationally adapted eligibility criteria.

a) a formal application letter signed by the Network Partners Board or Directors (or the Chair);
b) the proposed Group COC eligibility requirements with a short justification;
c) the stakeholder report

Note: The stakeholder report in this context means the report from the consultation with stakeholders.

Code	INT-STD-40-003_03
Requirement (s)	V2-1, Clause 3.1
Publication date	11 November 2016

Is it acceptable that the total annual turnover of non-profit organizations offering sheltered workshops for disabled people and of prison workshops is calculated based on the sales of forest-based products rather than based on revenues of all goods and services?

Yes, this is allowed. The national and international total annual turnover thresholds were calculated considering commercial activities of enterprises, not considering such types of non-profit organizations and prison workshops for prison labor.

Code	INT-STD-40-003_04
Requirement (s)	V2-1, Clause 5.2.2.c
Publication date	09 April 2018

In the selection of Central Office internal auditors, the standard specifies that "Auditors shall not audit activities for which they are responsible to oversee or participate in…". Does this mean that supervisors or general managers who have ultimate authority over activities such as receipt of material or processing shall not conduct internal audits of those activities, even where the person does not perform these activities?

"Being responsible to oversee or participate in" applies to direct supervisors of staff that are responsible for supervising and controlling the work of staff.

A general manager could conduct audits where he/she is not the direct supervisor, even though being ultimately responsible for the activities of the organization.

Code	INT-STD-40-003_02
Requirement (s)	V2-1, Clause 5.2.4
Publication date	13 February 2015

According to Clause 5.2.4, for certificates with more than 20 Participating Sites and where the Participating Sites are not linked through common ownership, the Central Office's auditors shall be in possession of a formal ISO 9001, ISO 14001 or OHSAS 18001 lead auditor certificate achieved through a recognized accredited training course. Is there an alternative solution for the qualification of Central Office's auditors?

Yes, training provided by FSC-accredited certification bodies or training organizations recognized by FSC satisfies the requirements of Clause 5.2.4 alternatively, provided the following conditions are met:

• The training includes an equivalent of a 3-days ISO 19011 training course (incl. exam) provided by a formally qualified QMS, EMS or OHSAS lead auditor.
• If the training is provided by an FSC-accredited certification body through an in-house trainer:

- The training course agenda and course material needs to be approved by ASI in advance.
- ASI must be given the right to witness the implementation of trainings at its sole discretion.

NOTE: The certification body should carefully consider and address potential conflicts of interest.

FSC-STD-40-004 (V2-1) FSC STANDARD FOR CHAIN OF CUSTODY CERTIFICATION

Code	INT-STD-40-004_19 (also published under FSC-STD-40-006 with code INT-STD-40-006_04)
Requirement (s)	V2-1, Section E
Publication date	05 September 2014
Status	Withdrawn

Code	INT-STD-40-004_25
Requirement (s)	V2-1, Clause 1.4.2
Publication date	24 July 2015
Status	Withdrawn

Code	INT-STD-40-004_09
Requirement (s)	V2-1, Clause 2.1.3
Publication date	18 April 2011
Status	Withdrawn

Code	INT-STD-40-004_26
Requirement (s)	V2-1, Clause 4.1
Publication date	05 October 2015
Status	Withdrawn

Code	INT-STD-40-004_28
Requirement (s)	V2-1, Clause 4.1.1
Publication date	01 July 2016
Status	Withdrawn

Code	INT-STD-40-004_18
Requirement (s)	Clauses 4.1.1; 6.1.1; 6.1.2
Publication date	19 May 2014
Status	Withdrawn

Code	INT-STD-40-004_14 (also published under FSC-STD-20-007 with code INT-STD-20-007_11)
Requirement (s)	V2-1, Clause 5.2
Publication date	06 February 2012
Status	Withdrawn

Code	INT-STD-40-004_06
Requirement (s)	V2-1, Clause 6.1.1
Publication date	15 April 2011
Status	Withdrawn

Code	INT-STD-40-004_22
Requirement (s)	Clause 6.1.1g
Publication date	24 July 2015
Status	Withdrawn

Code	INT-STD-40-004_27
Requirement (s)	V2-1, Clause 6.2.1
Publication date	14 December 2015
Status	Withdrawn

Code	INT-STD-40-004_29
Requirement (s)	V2-1, Clause 6.3.1

Publication date	01 July 2016
Status	Withdrawn

Code	INT-STD-40-004_15
Requirement (s)	V2-1, Clause 7.3.1
Publication date	23 April 2013; amended 10 March 2016
Status	Withdrawn

FSC-STD-40-004 (V3-0) CHAIN OF CUSTODY CERTIFICATION

Code	INT-STD-40-004_39
Requirement (s)	V3-0, Clause 7.3
Publication date	01 August 2018
Status	Withdrawn

Code	INT-STD-40-004_33
Requirement (s)	V3-0, Clause 12.5
Publication date	08 September 2017; updated 13 September 2022
Status	Withdrawn

FSC-STD-40-004 (V3-1) CHAIN OF CUSTODY CERTIFICATION

Code	INT-STD-40-004_03
Requirement (s)	V3-1, Clause 13.2
Publication date	01 February 2011; updated 13 September 2022
Status	Withdrawn

Code	INT-STD-40-004_36
Requirement (s)	V3-1, Clause 8.2, NOTE
Publication date	08 September 2017; updated 13 September 2022
Status	Withdrawn

Code	INT-STD-40-004_31
Requirement (s)	V3-1, Clause 11.5
Publication date	15 March 2017; updated 13 September 2022
Status	Withdrawn

Code	INT-STD-40-004_60
Requirement (s)	V3-1, Clause 2.3
Publication date	09 September 2022
Status	Withdrawn

Code	INT-STD-40-004_20
Requirement (s)	V3-1, Section B: Scope
Publication date	13 February 2015; updated 13 September 2022

Is it allowed to classify wood-based resin adhesives and lignin sulfonate used for sizing in paper production as "neutral"?

Yes, until FSC has developed an approach to verify this type of NTFP material it is acceptable to classify such material as "neutral".

NOTE: "Neutral" means that this material is exempt from Chain of Custody control requirements.

Code	INT-STD-40-004_30
Requirement (s)	V3-1, Section B: Scope
Publication date	11 November 2016; updated 13 September 2022

Are logistics companies expected to be covered by an outsourcing agreement, if there is risk that FSC certified material is mixed with non-FSC material during transport or temporary storage?

Yes, in such cases the logistics companies need to be covered by an outsourcing agreement in accordance with the requirements of Section 13 of FSC-STD-40-004 V3-1.

Code	INT-STD-40-004_49
Requirement (s)	V3-1, Section B: Scope, Clauses 2.1, 2.3, 4.2., 4.4, 5.1, 5.3 and 5.7
Publication date	30 June 2020

When government agencies (or government bodies) run a public wood auction system, can timber that is owned and sold by the government, and originating from a government licensed concession which is FSC certified, be considered FSC certified although the agency itself does not hold an FM/COC or COC certificate?

Yes, this timber can be sold as FSC certified if it can be demonstrated that the certificate holder:

a. source timber originating from an FM/COC certified Management Unit (MU) and the timber was harvested in full conformance with applicable FSC requirements;
b. implement a system that allows the timber to be traced back to the MU in which it was harvested, together with information on volume and cutting/harvest date.
c. establish a system between the agency and the certificate holder to regulate and control the use of the certificate holder's certification code and FSC Claims;
d. maintain control over the timber until the sale is made (i.e. the material is shipped directly to the auction winner from the certificate holder);
e. ensure that non-certified organizations (like the government agency) is not using the certification code of certified organizations in their own documents. In these exceptional cases, it is sufficient that only the sales or delivery document issued by the certified organization contains all information as specified in FSC-STD-40-004 V3-1 Clause 5.1 and is used to identify inputs and outputs sold with FSC claims. The document issued by the non-certified organization shall contain sufficient information to link the sale and related delivery documentation to each other.
f. grant access to the certification body of an FM/COC certificate holder to all relevant documentation, records and sites of the agency and the successful bidder to verify the correct implementation of all applicable requirements, including those listed in this interpretation.

NOTE 1: CoC certification is not required for organizations providing services to certified organizations without taking legal ownership of the certified products, including:

a. agents and auction houses arranging the trade of certified products between buyer and seller;
b. providers of logistics services, transporting and/or temporarily storing or warehousing certified products without changing their composition or physical integrity;
c. contractors operating under an outsourcing agreement in accordance with Section 13 of the FSC-STD-40-004 V3-1 standard.

NOTE 2: Any other situation with a non-certified auction entity shall be submitted to FSC for a case-by-case analysis.

Code	INT-STD-40-004_58 (also published under FSC-STD-40-006 V2-0 with code INT-STD-40-006_05)
Requirement (s)	V3-1, Section B: Scope FSC-STD-40-006 V2-0, Section B: Scope & Annex A, definition of 'Projects'
Publication date	15 September 2022

Which standards can organizations apply when certifying a project?

Organizations should apply FSC-STD-40-006 for the certification of single and multiple projects. However, organizations can opt to apply FSC-STD-40-004 in case it is more adequate for their needs.

Depending on which standards are being applied, the charging mechanism for the Annual Administration Fee (AAF) will differ. In the case of FSC-STD-40-004, the Forest Products Turnover will be used to calculate the AAF, and in the case of FSC-STD-40-006, the overall costs of each project will be used.

For further details on the charging mechanism, please refer to the applicable version of the AAF Policy (FSC-POL-20-005).

Code	FSC-INT-STD-40-004_73
Requirement (s)	V3-1, Section B: Scope
Publication date	23 August 2024

1. **Is a non-certified auctioning entity required to be FSC CoC-certified if it takes physical possession of FSC-certified products and issues sales documents for the auctioned products?**

   No, a non-certified auctioning entity does not require to be FSC CoC-certified if, during trading activities, it takes physical possession but does not take legal ownership of the FSC-certified products, and it issues its own sales documents.

2. **Is a non-certified auctioning entity permitted to issue sales documents/invoices with relevant FSC claims for the auctioned products?**

   No, a non-certified auctioning entity is not permitted to issue sales documents/invoices with relevant FSC claims for the auctioned products. However, in order for the customer (the winning bidder) to consider product or material purchased through a non-certified auctioning entity as FSC-certified, a

supplementary letter or delivery document must be provided by the certified supplier to the customer and include all information required by Section 5 of FSC-STD-40-004 V3-1.

Note 1: Auctioning is understood as a process of buying and selling goods or services by offering them up for bid, taking bids, and then selling to the winning (highest) bidder. The auctioning entity (e.g., auction house, auctioneer, log market, etc.,) managing the auction does not take legal ownership of the goods for sale but collects the funds due and issues the sales invoice to the winning bidder.

Note 2: Similar considerations apply for non-certified entities issuing delivery documents with "FSC claims". Please refer to INT-STD-40-004_72 .

Code	INT-STD-04-004_66 (also published under: FSC-STD-20-001 with code INT-STD-20-001_46 FSC-STD-60-004 with code INT-STD-60-004_04 FSC-PRO-01-008 with code INT-PRO-01-008_01)
Requirement (s)	V3-1, Clause 1.7 FSC-STD-20-001 V4-0, Clause 1.9 FSC-STD-60-004 V2-1, Clauses 1.6.1, 2.6.1 FSC-PRO-01-008 V2-0, Clause 1.3
Publication date	07 December 2023

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

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

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

A. Scope

This interpretation is applicable to complaints procedures managed by:

a) FSC in relation to <FSC-PRO-01-008 Processing Complaints in the FSC Certification Scheme> and <FSC-PRO-01-009 Processing FSC Policy for Association Complaints>;

b) Certification bodies in relation to Clause 1.9 of <FSC-STD-20-001 V4-0 General requirements for FSC accredited certification bodies>;

c) Certificate holders in relation to:

i. Clause 1.7 of <FSC-STD-40-004 V3-1 Chain of Custody Certification> (for chain of custody);

ii. IGI 1.6.1, 2.6.1 and 4.6.1 of <FSC-STD-60-004 V2-1 International Generic Indicators> (for forest management).

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

1. Definitions

Persistent complaint:

A complaint:

a) that has already been resolved and closed; or

b) that has been submitted to any other entity handling complaints in the FSC system and are still under investigation; or

c) that is similar to a previously submitted complaint, with no or minor additions/variations and the complainant insists be treated as a new complaint.

Vexatious complaint:

A complaint:

a) without reasonable or probable cause; or

b) without good grounds or merit; or

c) meant to cause trouble and harm, namely malicious; or

d) meant to harass e.g., use of insulting and threatening language.

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

2. Basic principles

2.1 The presumption should always be that a complaint is made in good faith and that the abuse of the complaints and appeals mechanism is exceptional.

2.2 The concept of 'abuse' should be understood as the harmful exercise of the complaints mechanism for purposes other than those for which it is designed.

2.3 Every complaint shall be assessed for admissibility. Even if someone has made persistent or vexatious complaints in the past, it shall not be assumed that any other complaint they make will also be persistent or vexatious.

2.4 FSC does not tolerate violence and harassment in any form, whether direct or indirect by any party involved in a complaint.

3. Procedural requirements

3.1 The entity handling complaints in the FSC system shall assess and classify whether a complaint is 'persistent' or 'vexatious'.

3.2 A complaint classified as 'persistent' or 'vexatious' is considered inadmissible and can be rejected.

3.3 The decision on the inadmissibility of a complaint because of its persistent or vexatious nature shall be taken by the person/s having overall authority and responsibility for resolution of complaints.

3.4 The decision shall be recorded and communicated to the complainant within (2) weeks of making the decision.

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

4. Additional options for consequences

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

4.2 These consequences may include but are not limited to:

a) Placing limits on the number and duration of contacts with staff per week or month;

b) Offering a restricted timeslot for necessary contacts;

c) Limiting the complainant to one method of contact access channel (telephone, letter, email etc);

d) Providing a single point of contact;

e) Only considering a certain number of issues in a specific period with a request to prioritize;

f) Responding to the overall issue rather than each and every enquiry or complaint that has been classified as persistent and/or vexatious;

g) Considering complaints that have been classified as persistent and/or vexatious as stakeholder comments and addressing them during the next audit.

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

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

Code	INT-STD-40-004_61 (also published under FSC-STD-20-011 with code INT-STD-20-011_36)
Requirement (s)	V3-1, Clause 1.5 FSC-STD-20-011 V4-2, Clause 11.2
Publication date	04 May 2023

Is it required to have a policy statement in the local language of the area in which the organisation or site is located?

Yes. To be “made available to stakeholders”, the policy statement shall be readable by workers. This requires use of the local language. In areas with more than one local language, this means that the policy statement will need to be available in those languages.

Consideration shall also be given to the languages of contractors and sub-contractors.

Code	INT-STD-40-004_68
Requirement (s)	V3-1, Clauses 1.5, 1.6, and Section 7 ADVICE-40-004-23 V2-0, Clauses 1.1; 1.2
Publication date	7 March 2025

Do the requirements to provide a policy statement and self-assessment for conformance to FSC core labour requirements apply to an organization or contractor, that consists solely of the owner(s) or employer(s) (e.g., one-person companies, family-run companies without workers, director-only companies without workers) and has no current or future plans to hire workers?

No, if the organization has no workers and no plans to hire anyone for employment, has no outsourcing agreements in place within the scope of the Chain of Custody certification, and is run only by the owner(s) or employer(s), the organization is not required to provide a policy or self-assessment for the purposes of evaluation of conformance to the FSC core labour requirements (CLR).

The commitment by the organization to uphold the FSC values, through association with FSC, is considered sufficient in such instances.

If, however, the situation changes, and the organization hires any workers, or engages in any outsourcing agreement with a non-FSC-certified organization within the scope of FSC chain of custody certification and this organization has workers, the organization is required to fulfil all relevant requirements in FSC-STD-40-004 and related normative documents, including provision of a policy statement and self-assessment.

Similar considerations apply for non-FSC-certified contractors with the characteristics as described above: the organization is not required to include them within their self-assessment for the purposes of evaluation of FSC CLR.

Code	INT-STD-40-004_35
Requirement (s)	V3-1, Clause 1.8
Publication date	08 September 2017; updated 13 September 2022

How should an FSC-certified organization proceed if a supplier notifies that certain products delivered to the organization are non-conforming products? Shall the organization also apply the non-conforming procedures, even if the non-conformity was caused by a supplier?

Yes. Once an FSC-certified organization is aware that a certain product received does not conform to certification requirements, it shall treat such products as non-conforming inputs and apply the requirements specified in Clause 1.8 of V3-1 ensuring that they are not sold as being FSC certified.

Code	INT-STD-40-004_42
Requirement (s)	V3-1, Clause 1.9
Publication date	02 April 2019; updated 13 September 2022

What does a sample mean in the context of transaction verification?

As a default, a 'sample' is defined as all transactions in a specified period of time. The sample can include all trading partners or be specific to a product type, product group, species, region, and/ or group of customers or suppliers. FSC may pre-determine the type of sample to be taken in a given investigation, which may include instructions on sample size (all or parts of transactions), sampling method (e.g., random, systematic), and if the transactions should be provided in a list of individual transactions or aggregated across the specified period.

Code	INT-STD-40-004_43
Requirement (s)	V3-1, Clause 1.9
Publication date	22 July 2019; updated 13 September 2022

Does *providing samples of FSC transaction data* mean that the samples shall be taken off-site by an ASI and/or a CB auditor for transaction verification purposes?

Yes, a CB and/or ASI shall collect and take the requested samples off-site for the purpose of transaction verification, which includes transmission of the data to ASI and storage in ASI's Transaction Verification Tool.

Note 1: ASI's Transaction Verification Tool is an online transaction matching tool managed by ASI. Transaction data uploaded to the system is automatically matched with other transactions of the specified period in the current Transaction Verification (TV) Loop, in order to identify imbalances in declared inputs and outputs.

Note 2: FSC, ASI and CB each are responsible to have processes in place for ensuring that personal data and confidential business data collected and taken off-site is processed and protected in compliance with applicable mandatory laws.

Code	INT-STD-40-004_53
Requirement (s)	V3-1, Clause 2.3
Publication date	07 September 2021

Organization 'A' produces FSC material which is sold to organization 'C', through an intermediate organization 'B' (trader without physical possession). If trader B's CoC certification is terminated after it has issued a sales invoice to organization 'C', but while the material is still in transit from organization 'A' to 'C', is that material still considered FSC certified?

Yes, the material is considered FSC certified, provided organization 'C' can demonstrate that:

i. The invoice for FSC certified material was issued by trader 'B' prior to the termination of its CoC certification; *and*
ii. The material was in the physical possession of organization 'A' before its shipment to organization 'C'; *and*
iii. There has been no mixing of the FSC certified material with non-certified materials during the storage/shipment of the material during the time the material was in legal ownership of trader 'B'.

Code	INT-STD-40-004_59
Requirement (s)	V3-1, Clause 2.3
Publication date	15 September 2022

What supplier documentation should organizations be checking?

In general, it is sufficient for organizations to only check their supplier's invoice to confirm all the information required under Clause 2.3 is present.

In the event the invoice is not available, the organization should check delivery documentation to confirm all the information required under Clause 2.3 is present.

If the required information is spread across both the supplier's sales and delivery documentation, then the organization will need to check both to confirm all the required information is present.

In extraordinary cases where the FSC claim and/or certificate code was not able to be provided through the sales or delivery documentation, the organization shall check relevant supplementary documentation to determine the quantity of claim-contributing inputs.

Code	INT-STD-40-004_37 (also published under FSC-STD-20-007 with code INT-STD-20-007_47)
Requirement (s)	V3-1, Clause 2.4 FSC-STD-20-007, Terms and definitions 'Joint certification'
Publication date	07 February 2018

Can wood be considered as FSC-certified in cases where an organization (e.g. a logger) buys non-certified standing wood that is afterwards included in the scope of a FM/CoC certification?

Yes, the wood may be considered as FSC-certified under the following conditions:

- the Forest Management Unit has to be FM/CoC certified at the time of harvesting
- the seller (FM/CoC organization) provides the buyer (CoC organization) with supplementary documentation in accordance with Clause 5.7 of FSC-STD-40-004 V3-1.

Code	INT-STD-40-004_10
Requirement (s)	V3-1, Clause 2.4
Publication date	15 August 2011; updated 13 September 2022

Is PEFC certified material eligible to be used in FSC product groups as FSC certified or FSC Controlled Wood?

No. Material certified by the Program for Endorsement of Forest Certification (PEFC) is not accepted as FSC certified input and does not automatically meet the requirements of the FSC Controlled Wood standards. Therefore, PEFC certified material classifies as non-FSC certified input and must comply with FSC Controlled Wood standards before its use in FSC product groups.

Code	INT-STD-40-004_50 (also published under FSC-STD-20-011 V4-2 with code INT-STD-20-011_30)
Requirement (s)	V3-1, Clause 4.4 FSC-STD-20-011 V4-2 Table B Clause 4 h)
Publication date	02 December 2020; updated 13 September 2022

Can an organization that makes custom manufactured products (e.g., woodworkers, building contractors, construction companies) choose to not present volumes (e.g., in m^3) in their overview of job orders or construction projects?

Yes, organizations that make custom manufactured products may present the annual volume summary as an overview of the job orders or construction projects instead of by product group covering the previous reporting period and other requirements as specified in Clause 4.4.

When the organization is reporting only an overview of job orders or construction projects and not the annual volume summary, the certification body may meet the reporting requirements of FSC-STD-20-011 PART III Table B Clause 4 h) by including the total number of jobs orders presented in the overview of custom projects.

Code	INT-STD-40-004_12
Requirement (s)	V3-1, Clause 5.1 f
Publication date	05 September 2011; updated 13 January 2022

In some countries, self-billing Invoices (SBIs) prepared by the purchaser are a substitute document for an invoice by the seller. It is acceptable that the purchaser uses the certification code of the seller in SBIs?

Yes. As SBIs represent a long-established business practice in the forestry industry and fully accepted by the tax authorities, it is acceptable that purchaser uses the certification code of the seller or includes both the seller's and the purchaser's certification code in SBIs.

Code	INT-STD-40-004_08
Requirement (s)	V3-1, Clauses 5.1 and 5.7
Publication date	18 April 2011; updated 13 January 2022

Is it acceptable that the FSC Claims are abbreviated (e.g., FSC Mix Cred) due to space constraints in invoices?

Yes, with the condition that:

a) The abbreviation of FSC Claims is clearly defined in the organization’s documented procedures; and

b) The complete FSC claim is provided to customers through supplementary evidence, as defined in Clause 5.7.

Code	INT-STD-40-004_52
Requirement (s)	V3-1, Clauses 5.1, 5.7 and 12.1
Publication date	05 July 2021; updated 13 September 2022

Can organizations that sell FSC certified and labelled products on (or through) online marketplaces/ e-commerce sites and not having access to information to identify their ultimate customers (such as name and contact information) use mechanisms other than sales/delivery documents to record and pass on information regarding the FSC claims?

Yes, organizations selling FSC certified and labelled products via online marketplaces/e-commerce sites and not having access to their customer contact information can use a combination of existing sales/delivery documents and internal sales records to record and pass on information regarding FSC claims. In the absence of sales/delivery documents, the internal sales records shall meet the requirements of Clauses 5.1 and 5.7.

NOTE 1: For Clause 5.1 b) information identifying the online marketplace/e-commerce site can be used instead of information to identify the consumer.

NOTE 2: When the date of sale to the end customer is not available or confirmed, the date of product placement on the e-commerce site/online marketplace can be used instead.

NOTE 3: In the absence of sales/delivery documents, the customers cannot further pass on the FSC claims.

The internal sales record shall be maintained up to date and presented to certification body auditors in addition to existing sales/delivery documentation. Upon request, the sales record shall be made available to the customer.

Code	INT-STD-40-004_44
Requirement (s)	V3-1, Clauses 5.1; 7.3; 11.1 and 12.2
Publication date	17 September 2019; updated 13 September 2022

Can an FSC-certified organization make claims on sales documents regarding the FSC certified packaging used for its products (FSC-certified or not)?

An FSC-certified organization may establish an FSC product group for FSC certified packaging purchased from a certificate holder, for the purpose of controlling FSC output claims and labelling provided that:

1) All components of the FSC certified packaging are FSC-certified (e.g., folding box and a wrapping paper) and;

2) The FSC-certified organization ensures that sales documents include information on the FSC product group “Packaging” and the relevant FSC claim. Some examples of information on sales documents:

- Packaging: FSC Mix 70%;
- “Product name”: FSC Mix Credit / Packaging: FSC Mix 70%;
- “Product name” and packaging: FSC Mix Credit

The FSC-certified organization may omit the percentage or credit information in sales documentation (e.g. using “FSC Mix” claim only instead of “FSC Mix 70%” or “FSC Mix Credit”). In this case, however, the percentage or credit information cannot be passed along the supply chain by certificate holders.

NOTE: The organization may label or promote the FSC-certified packaging following the requirements specified in FSC-STD-50-001.

Code	INT-STD-40-004_07
Requirement (s)	V3-1, Clause 5.1
Publication date	18 April 2011

In which language shall the FSC claims on sales and delivery documents be written?

The FSC Claims on sales and delivery documents shall be written in English in the case of international sales. However, it is acceptable that the FSC Claim is translated to the other languages in the case of sales at national level (e.g. when both supplier and customer are located in the same country) or when the official language in the country of the supplier and customer is the same.

Code	INT-STD-40-004_24
Requirement (s)	V3-1, Clause 5.1
Publication date	24 July 2015

Is an organization allowed to include the FSC Chain of Custody code of its supplier on the invoice, in addition to its own code?

Yes, but it must be clear which code belongs to the organization issuing the invoice and which is the suppliers' code.

Code	INT-STD-40-004_17
Requirement (s)	V3-1, Clause 5.1
Publication date	19 May 2014, Updated 04 May 2023

Are contractors allowed to include the certificate code of the contracting certified organization in their delivery documentation?

Yes, contractors can use the certificate code of the contracting organization in their delivery documentation, subject to approval by the contracting organization.

Code	INT-STD-40-004_16
Requirement (s)	V3-1, Clause 5.1
Publication date	23 April 2013, Updated 04 May 2023

Is the FSC Mix 100% claim allowed?

Yes, the FSC Mix 100% claim is allowed on sales and delivery documents

Code	INT-STD-40-004_72
Requirement (s)	V3-1, Clause 5.1
Publication date	01 July 2024

Can non-certified organizations providing services to certificate holders under outsourcing agreements include FSC claims in their delivery documents?

No. A non-certified organization shall not make “FSC claims” on their delivery documents. They could only pass on the claims of the products that are owned by the certified contracting organization to the next organization down the supply chain if they would hold their own FSC COC certification.

NOTE: Since they would act as a service provider, they would be charged the minimum AAF provided in <FSC-POL-20-005 Annual Administration Fee>.

Code	INT-STD-40-004_32
Requirement (s)	V3-1, Clause 5.6
Publication date	08 September 2017; updated 13 September 2022

Clause 5.6 specifies that organizations may only sell products with the ‘FSC Controlled Wood” claim to customers that are FSC certified. Are certificate holders also allowed to sell FSC Controlled Wood to project applicants according to FSC-STD-40-006?

Yes. Since FSC Controlled Wood is an eligible input in project certification, CoC certificate holders can sell products with FSC Controlled Wood claims on sales documents to FSC project applicants.

Code	INT-STD-40-004_56
Requirement (s)	V3-1, Clause 5.6
Publication date	30 June 2022

The Chain of Custody standard only allows the sale of raw or semi-finished products as FSC Controlled Wood. However, it is not clear whether decking or other products (windows, doors, frames, etc.) that are ready for installation can be considered as semi-finished products and can be sold with the FSC Controlled Wood claim. Several certificate holders currently list ‘decking’ in their product group list on the FSC database with a FSC Controlled Wood claim which would show that they can be considered as semi-finished products.

Can products that do not undergo any further transformation except for installation purposes (e.g., decking, windows, doors etc.) be considered semi-finished products? Can they be sold with an “FSC Controlled Wood” claim?

This depends on the intended end use of the product by the end-user. According to FSC-STD-40-004 products like decking, windows, and doors that will not undergo any further processing except for installation purposes are considered as a finished product and cannot be sold with an ‘FSC Controlled Wood’ claim.

However, when used in FSC certified projects under FSC-STD-40-006, where they add to the overall completion of the project, they can be considered as semi-finished products and be sold with an “FSC Controlled Wood” claim.

Code	INT-STD-40-004_46
Requirement (s)	V3-1, Clause 5.8
Publication date	06 March 2020; updated 13 September 2022

Is it acceptable that organizations supplying the construction sector make partial FSC claims on supplementary documents for custom manufactured FSC products such as construction components (e.g. dam walls) and assembled products (e.g. window frames) if these products also contain components of other forest certification schemes?

Yes, organizations supplying construction components or components of assembled products to the construction sector which contain FSC certified material may make FSC claims on supplementary documents only.

These components are, however, not eligible to carry the FSC label and cannot be promoted as FSC-certified. FSC claims shall identify which specific components are certified and shall not be used in a way that implies equivalence to other forest certification schemes (e.g. Window frame FSC 100% & XX% ABCD). All elements of the FSC claims shall meet the requirements as specified in FSC-STD-40-004.

Examples of FSC-certified components with FSC claims:

- Door core-oriented strand board, FSC Mix Credit, XX-COC-000000
- Door Frame MDF, FSC Mix 70%, XX-COC-000000
- Door Wing solid oak FSC 100%, XX-COC-000000

NOTE 1: A ‘Partial claim’ is an FSC claim which refers to only stated FSC-certified components or components of an assembled product that are FSC-certified and have a functional purpose. They do not refer to components covered under other forestry certification schemes.

NOTE 2: The objective of the interpretation is to enhance the transparency of sales of FSC-certified components and components of assembled products if they are also certified by other forest certification schemes.

Code	INT-STD-40-004_57
Requirement (s)	V3-1, Clause 6.1
Publication date	30 June 2022; updated 13 September 2022

Does the phrase “or timber products” in Clause 6.1 refer to *all* timber products being subject to the requirements, even those timber products which are not under the scope of the certificate?

No. The inclusion of the phrase “or timber products” clarifies that all material carrying an FSC claim or those which falls under the scope of the certificate is subject to the requirements in Section 6 ‘Compliance with timber legality legislation’. Material that is not part of the scope of the certificate is not subject to these requirements.

NOTE: This interpretation does not limit FSC, ASI, or certification bodies from examining legal documents for timber products not included under the organization's certificate scope when there is a suspicion or indication of violation of timber legality legislation such as trade and customs laws under the Policy of Association (FSC-POL-01-004 V2-0/V3-0).

Code	INT-STD-40-004_71 (also published under FSC-STD-40-005 with code INT-STD-40-005_35; FSC-STD-01-004 with code INT-STD-01-004_08)
Requirement (s)	FSC-STD-40-004, V3-1, Clause 6.1 FSC-STD-40-005, V3-1, Annex A, Clause 3.6 FSC-STD-01-004, V1-0, Terms and Definitions; Clause 1.1.1 b) FSC-STD-40-004r, V1-0, C. Terms and Definitions FSC-STD-01-001, V5-3, Criterion 1.5 FSC-STD-60-004, V2-1, Annex A
Publication date	1 July 2024; updated 1 April 2025

Is compliance with the relevant legislation of the country of production as per EUDR covered by FSC requirements?

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.

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>.

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."

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.

Code	INT-STD-40-004_69
Requirement (s)	V3-1, Clause 7.3
Publication date	24 May 2024

Are there situations where the retention of workers' original identity documents (e.g. passports) by the Organization is permitted and considered not indicative of forced labour under clause 7.3 of FSC-STD-40-004 V3-1?

No. Any evidence of retention of workers' original identity documents shall be viewed as an indication of forced labour under clause 7.3 of FSC-STD-40-004 V3-1 and is not permitted. It is recommended that the organization retains only copies of any such identity documentation for record-keeping purposes.

Evidence to show the personal document(s) has/have been voluntarily provided to the organization by the worker for the organization to retain for safekeeping e.g., a signed consent form, are not considered acceptable.

Provision of Worker Accommodation

The worker has the overall responsibility to take care of their personal belongings, however in situations where the organization provides accommodation for workers, the organization should take reasonable steps to ensure the accommodation provides a secure space in which workers can safely store personal documents, such as passports or identity documents.

In situations where the accommodation is shared by multiple non-familiar individuals, and rooms are not personal per worker, reasonable steps may include the provision of personal lockers that are always accessible by the worker, for example, by use of a key or a personal identification number (PIN). By 'accessible', this means provisions are available twenty-four hours a day and every day.

If the organization is not the legal owner of the accommodation provided to workers but has arranged the accommodation for the workers, the organization should ensure adequate provisions, as above, to secure personal documents are made available, and that the worker does not incur any additional cost for access to such facilities.

Code	INT-STD-40-004_23
Requirement (s)	V3-1, Clause 8.1
Publication date	24 July 2015; amended 11 November 2021; updated 13 September 2022

Can a COC certificate holder establish a product group list that includes products that are not eligible to be sold with an FSC claim?

No, Clause 8.1 of FSC-STD-40-004 V3-1 specifies that organizations shall establish product groups for the purpose of controlling FSC output claims and labelling. Therefore, FSC product groups shall only include products that are eligible to be sold with FSC claims.

Code	INT-STD-40-004_05
Requirement (s)	V3-1, Clause 8.1 b)
Publication date	15 April 2011; updated 13 September 2022

Is it acceptable to switch between credit and percentage control systems in a product group? For example, an organization uses the percentage system, but when the end of the claim period comes, they have not obtained enough input volume to reach the labelling threshold of 70%.

Then they switch to the credit system and sell a volume of FSC Mixed Credit material equal to the Mixed XX% calculation.

No, the organization cannot have two systems of control for the same product group and switch from one to another ad libitum. In a situation where the organization cannot reach the minimum threshold for labelling, the products can still be claimed as FSC certified on invoices informing the applicable FSC percentage (e.g., FSC Mixed 45%), but the FSC label shall not be applied.

However, an organization may decide to permanently switch from one control system to another by defining a new product group. In this case the following shall apply regarding remaining eligible material:

1. from the percentage to the credit system: the organization may enter in its credit account an input equivalent to the volume of FSC Mixed x% output resulting from the last claim period or job order that was not sold under the percentage system.
2. from credit to percentage system: the remaining credits from the credit account cannot be used as input for the percentage system.

Code	INT-STD-40-004_38
Requirement (s)	V3-1, Box 4
Publication date	01 August 2018; updated 13 September 2022

Can a trader buy firewood logs and sell them as pulp logs?

No, buying firewood and selling it as pulpwood would represent an upgrading of product quality, which is not allowed according to FSC standards.

Code	INT-STD-40-004_40
Requirement (s)	V3-1, Clause 8.3
Publication date	01 August 2018; updated 13 September 2022

Can organizations specify it their product groups species and products that they are not able to source, produce and/or sell?

No, organizations shall only include in their product groups the products and species that they sold with FSC claims since the last assessment by the certification body and the ones that are feasible to be supplied with FSC claims. Since Certification Bodies are required to approve product groups of their clients, they also have a role in analyzing and making a judgement on whether the information provided by the organization makes sense with regards to commercial and legal availability and can be approved as product group.

Code	INT-STD-40-004_41
Requirement (s)	V3-1, Clause 8.3
Publication date	01 August 2018; updated 13 September 2022

Can an organization specify in its product group list a copy of the species list information from its suppliers, without any consideration of whether these species are or will actually be supplied?

In principle, it is not a problem when an organization declares the same species scope as its supplier, as it is dependent on the species information provided by their suppliers. However, when establishing its product groups, organizations shall refer to the species that they actually sourced or will be able to source from their suppliers.

Code	INT-STD-40-004_74
Requirement(s)	V3-1, Clause 8.3.c)
Publication date	23 August 2024

Do species of wood pellets (product type W3.6) need to be specified in the list of the product groups of the certificate holders who have this type of product in the scope of their FSC COC certification?

Yes. Since the species of wood pellets determine their heat output, burn efficiency, emissions, etc., a list of possible species shall be specified and recorded in product groups for this product type (W3.6). Similar considerations apply for product types W1.2 (Fuel wood) and W3.7 (Sawdust briquettes).

Code	INT-STD-40-004_13
Requirement (s)	V3-1, Section 11 and Box 7
Publication date	01 December 2011; updated 13 September 2022

Are traders authorized to apply the credit system for trading of unfinished products?

Traders can apply the credit system on the level of a trading office site according to Box 7 covering the application of the credit system.

Code	INT-STD-40-004_48
Requirement (s)	V3-1, Clause 11.2
Publication date	30 June 2020; updated 13 September 2022

An FSC certified organization (sawmill) processes logs to produce two output product groups: lumber and residuals (woodchips and sawdust). Since both output product groups originated from the same raw input material (logs), can the sawmill opt to allocate all the output credits into the credit account of one of these two output product groups?

Yes, this is possible provided that the relevant product groups are established (i.e., lumber, woodchips and sawdust) and the output product group that receives all the credits can be produced from the other output product group that donates these credits (i.e., lumber processed into woodchips/sawdust). For example, at a sawmill, woodchips and sawdust could be produced from lumber, while the reverse is not

possible. In such a situation, the organization may choose to allocate all output credits of the input material (logs) to the credit account of the product group containing the residuals.

The maximum amount of output credit that can be allocated to the credit account of the product group containing the residuals shall be determined by applying the applicable conversion factor reflecting the quantity of residuals that would be available if an entire log were converted into residuals.

Code	INT-STD-40-004_45
Requirement (s)	V3-1, Clause 11.3 e)
Publication date	17 September 2019; updated 13 September 2022

1. What does the term "used" mean in the context of 10% of the input credits used by its own site?

2. Can a Central office (CO) maintain a centralized credit account, when the CO does all the purchasing and selling? Operational sites are the ones physically receiving, transforming and shipping the material.

1. Using input credits from a centralized credit account by a participating site means to deduct them from the centralized credit account for the purpose of selling material produced at that site with relevant credit claims. In order to be eligible to "use" a certain amount of input credits, a participating site shall have contributed over a 12-month period at least 10% of those credits through claim-contributing input materials that have been physically received in its own facilities. The remaining 90% of the used input credits can come from transferred (virtual) input credits.

2, In the situation where the Central Office (CO) maintains a centralized credit account, the contribution of input credits cannot be demonstrated through relevant purchase documents. In this case, relevant delivery documents need to be checked for this purpose.

Code	INT-STD-40-004_11
Requirement (s)	V3-1, Clause 12.1 and Scope
Publication date	05 September 2011; updated 13 September 2022

According to FSC-STD-40-004 V3-1, publishers and retailers are not required to be certified in order to resell FSC finished products, unless they perform at least one of the following activities:

a. sell FSC-certified products with FSC claims on sales documents;

b. label products as FSC certified;

c. manufacture or change the composition (e.g., mixing or adding forest-based materials to the product) or physical integrity (e.g. re-packaging, re-labelling) of products sold with FSC claims;

d. promote FSC-certified products, except finished and FSC-labelled products that may be promoted by non-certificate holders (e.g. retailers) in accordance with FSC-STD-50-002 Requirements for Promotional Use of the FSC Trademarks by Non-Certificate Holders.

However, some companies that don't need certification are FSC certified in order to demonstrate their commitment to the FSC certification principles and values. In this context, are certified publishers and retailers required to comply with Clause 12.1 of FSC-STD-40-004 V3-1 if they sell

finished certified products to customers that don't need or want to receive the invoices with FSC Claims on it?

No, for certified publishers and retailers that sell finished certified products to customers that don't need or want to receive the invoices with FSC Claims on it, Clause 12.1 may be classified as not being applicable.

Code	INT-STD-40-004_63
Requirement (s)	V3-1, Clause 12.1; 12.2
Publication date	13 June 2023

FSC-STD-40-004 V3-1, Clause 12.1, states that if a product is labelled, then the label shall always correspond to the FSC claim made on sales documents. Clause 5.1 states that a clear indication of the FSC claim shall be included in sales documentation for products sold with FSC claims.

However, does an organization necessarily have to sell labelled products with the corresponding FSC claim?

The organization shall sell products that it has labelled itself, or labelled products it has sourced as certified input and recorded accordingly in an FSC product group, with the corresponding FSC claim.

Conversely, products carrying an FSC label applied by a supplier which are kept outside the scope of the organization's certification (i.e., which are not recorded as inputs under its FSC product groups) cannot be sold with FSC claims.

Exemptions for finished products apply as defined by Section B 'Scope', Box 1, Paragraph d) of <FSC-STD-40-004 V3-1 Chain of Custody Certification> and specified by INT-STD-40-004_11.

Code	INT-STD-40-004_04
Requirement (s)	V3-1, Section 13
Publication date	15 April 2011; updated 13 September 2022

Are FSC outsourcing requirements applicable in the following situation: A subcontractor runs a scaling operation (scale house), which is located on-site at the FSC certified company's property?

No, outsourcing requirements are only applicable when the subcontractor takes physical possession of FSC certified material, off-site from a FSC certified organization. If a subcontracted activity occurs on-site at a FSC certified organization, then the activity shall be included in the certificate scope and evaluated as part of the organization's CoC audit.

Code	INT-STD-40-004_64
Requirement(s)	V3-1, Clause 13.2
Publication date	17 November 2023; updated 01 July 2024

Does FSC consider logging and forwarding activities as an outsourcing activity?

It depends. Conditions under which these activities can be outsourced are covered by the Basic Principle detailed below.

1. Definition

Harvesting: Harvesting and logging, both refer to the activity of felling trees.

Forwarding: Forwarding (also transportation or logistics) is the movement of forest-based material within the forest management unit, from the management unit to a primary processor, or for materials and products in the supply chain.

2. Basic Principle

2.1 Harvesting and Logging activities are either covered by the FM-certified Organization or a CoC certificate holder can include these activities under the scope of its chain of custody certification. Please refer to INT-40-004_47.

2.2 According to FSC-STD-40-004 V3-1 – Box 1 b) and Clause 13.2 – providers of forwarding, transportation, or logistics, of forest-based materials or products, are not required to be Chain-of-Custody certified or covered by a outsourcing agreement.

Code	INT-STD-40-004_01
Requirement (s)	V3-1, Clause 13.6
Publication date	01 February 2011; updated 13 September 2022

A printer outsources part of its production to a non-FSC certified contractor. Can the contractor buy FSC paper and add it to an outsourced production?

No, non-certified outsourcing contractors cannot buy and add forest-based material on their own, as per definition the contracting organization would not have ownership of all input materials. This would be different for certified contractors where they both act as contractors as well as suppliers with a purchase function on their own.

Code	INT-STD-40-004_70
Requirement (s)	V3-1, Clause 13.7
Publication date	19 March 2025

Does Clause 13.7 require the organization to include the information, as specified in Clause 5.1, in documents sent to the contractor?

No, the organization is not required to include the information, as specified in Clause 5.1, in the document accompanying the material from the organization's premises to the contractor.

The requirement focuses on the *identification* of sales documents (and related delivery documents, if applicable), for the purpose of keeping a record of the products sold that have been processed by a contractor.

Where this information (e.g., FSC claim) is relevant for the contractor to identify the material as being FSC-certified, the organization can include it in such a document or by other mutually agreed means.

Code	INT-STD-40-004_54
Requirement(s)	V3-1, Clause 13.9
Publication date	06 April 2022

Clause 13.9 requires the FSC-certified contractor shall ensure they have copies of sales documents from suppliers to link the applicable sales documentation to each other for outsourcing services. Does this requirement apply to all types of outsourcing activities or only if the contracting organization is not FSC-certified?

No, it does not apply to all types of outsourcing activities or services. Clause 13.9 is linked to clause 13.10 and applies to outsourcing activities where the organization provides FSC-certified outsourcing services to non-FSC-certified contracting organizations, or when the FSC-certified contracting organization buys the raw material for the outsourced processes.

Code	INT-STD-40-004_62
Requirement (s)	V3-1, Clause 13.9
Publication date	05 May 2023

Is it possible to decrease the submission of the invoices, related to the delivery notes that an FSC-certified contractor receives by the supplier/producer from which a non-FSC-certified contracting organization buys from, to random samples?

No. Sampling shall not be applied to invoices. The purpose of the requirement is to ensure the eligibility of the received materials (following the requirements in Section 2), as non-FSC-certified contracting organizations would not be able to do so.

Code	INT-STD-40-004_55 (also published under FSC-STD-20-011 V4-2 with code INT-STD-20-011_34)
Requirement(s)	V3-1, Clause 14.2 FSC-STD-20-011 V4-2, Clause 2.6 f) ii FSC-DER-2020-005
Publication date	30 June 2022

Under single CoC certification, if subsites do not have any purchase, processing, or sales function of their own but only provide logistical support, do they need to be evaluated as per the NOTE following Clause 14.2?

Yes, all subsites shall be evaluated for conformance with FSC-STD-40-004 requirements. Certification bodies can carry out desk audits or remote evaluations of certain subsites but shall conduct a physical inspection of these subsites at least once during the five-year duration of a certificate according to FSC-STD-20-011 V4-2, 2.6 f) ii.

Code	INT-STD-40-004_34
Requirement (s)	V3-1, Clause 15.1 b)
Publication date	08 September 2017; updated 13 September 2022

Do the "common operational procedures" specified in Clause 15.1 b) have to cover procedures that go beyond those related solely to certification?

Yes. The term "common operational procedures" should not be confused with "common certification procedures". The standard provides some examples of common operational procedures, such as same production methods, same product specifications, same integrated management software, which go beyond those related solely to FSC certification.

Code	INT-STD-40-004_67
Requirement (s)	V3-1, Annex C, Examples of which components of a product need to be certified
Publication date	16 February 2024

If a sticker/label is added to packaging or a carton, and the sticker/label indicates, with an approved FSC trademark, that the packaging or carton is made of FSC certified inputs, does the sticker/label need to be made of certified inputs?

No. FSC does not consider a sticker/label on packaging or a carton as having a primary function. Hence, in cases when the sticker/label carries an approved FSC trademark in relation to the FSC status of the packaging or carton, the sticker/label does not need to be made of FSC certified inputs. For example, an egg carton made of FSC certified inputs containing an FSC approved trademark on a non-FSC certified sticker/label.

Code	INT-STD-40-004_75
Requirement (s)	V3-1, Annex C, Examples of which components of a product need to be certified
Publication date	14 November 2025

Where the surface layer of a product (e.g., linoleum, veneer, laminate) is made of, or contains, forest-based material, does this component need to be certified?

Yes - if the surface layer of a product is made of, or contains, forest-based material, and is incorporated into the product to fulfil its function for the consumers' specific need, then that material needs to conform to the definition of eligible input (e.g. FSC 100%, FSC Controlled Wood, etc.).

For example, if a wooden table has a surface layer of linoleum that is made of, or contains, forest-based material, and the surface layer is non-detachable from the product, it will be regarded as "incorporated into the product to fulfil its function for the consumers' specific need". It follows that the linoleum will need to conform to the definition of eligible input.

An exception to this rule is where the surface layer is made of 100% non-timber forest products (NTFPs), and is distinguishable as such, and the FSC label clearly indicates the FSC-certified wood-based components of the product.

Code	INT-STD-40-004_51
Requirement (s)	V3-1, Annex E, definition of ‘Finished product’
Publication date	02 December 2020; updated 13 September 2022

Can wooden chips and pellets be considered as ‘finished products’?

FSC-STD-40-004 V3-1 defines ‘Finished product’ as “A product that will not undergo further transformation in terms of processing, labelling, or packaging prior to its intended end use or sale to the end-user. Installation of finished products, the filling of packaging, and cutting to size are not considered product transformation, unless these activities involve repackaging, changing of the FSC product composition, or relabeling.

NOTE: Some products may or may not be classified as a finished product depending on the intended use by the customers. For example, lumber or paper does not classify as a finished product if sold to a manufacturer that will further transform these materials into other products.”

The note following the definition further clarifies that for some products the classification for a finished product would depend on the intended use by the customer and would need to be evaluated on a case-by-case basis.

Wood chips and pellets may be considered as a finished or semi-finished product, depending on the intended use by the customer. If there is any repackaging involved or change in the product composition (e.g., wood pellets being powdered) or relabelling before being sold further down the supply chain, then it could be considered as a semi-finished product. However, if the customer is purchasing the wood pellets for direct use (e.g., burning them for energy generation), and it does not undergo further transformation, it would be considered as a ‘finished product’ at the point of sale.

Code	INT-STD-40-004_21
Requirement (s)	V3-1, Annex E, definition of ‘FSC claim’
Publication date	10 June 2015; updated 13 September 2022

Do FSC claims need to be spelled in sales documents as they are spelled in the COC standard FSC-STD-40-004?

The standard is not prescriptive about how the FSC claims should be spelled in sales documents. Therefore, only the 'FSC' acronym needs to be written in capital letters in FSC claims. The certified content specification (e.g., 100%, Mix Credit, Recycled 85%) may be spelled in lower case and/ or upper case (e.g. both FSC Mix Credit and FSC MIX CREDIT).

Code	INT-STD-40-004_47 also published under FSC-STD-20-011 with code INT-STD-20-011_37)
Requirement (s)	V3-1, Annex E, definition of ‘Scope’ FSC-STD-20-011 V4-2, Clause 2.6 e)
Publication date	30 June 2020; updated 13 September 2022

Can a CoC certificate holder (CoC-CH) include logging and harvesting activities (e.g., buying standing trees) under the scope of their chain of custody certification? Can they sell FSC-certified products?

Yes, a CoC certificate holder can include logging and harvesting activities under the scope of its chain of custody certification and sell FSC-certified forest products with FSC claims or use it as input for CoC-certified production or processes, provided that the certificate holder has the legal ownership of the timber at the time of harvest.

There are two main scenarios for a CoC-CH with logging and harvesting activities in the certification scope:

1) A logger is the CoC-CH and is buying and subsequently harvesting standing trees, regulated by a contract between the logger and the FM-certified Organization. The logger is taking legal ownership of FSC-certified material and therefore needs to be certified.
2) A timber trader or processor is the CoC-CH and is outsourcing the harvesting activities to a logger through an outsourcing agreement under the scope of certification. In this case, the logger does not take legal ownership of FSC-certified material and therefore does not need to be certified.

In both scenarios, the certification body of the CoC-CH shall visit log landings or timber storages if there is a risk that material from uncertified or uncontrolled sources could enter or where FSC certified or controlled material could leave the system (i.e., critical control points).

The FM-certified Organization is responsible for ensuring conformance of all activities within the certified MU with the applicable forest stewardship standard. This also refers to activities conducted by other persons or entities. It is the responsibility of the certification body of the FM-certified Organization to assure this conformance.

Code	INT-STD-40-004_02
Requirement (s)	V3-1, Annex E, definition of 'Solid wood product'
Publication date	01 February 2011; updated 11 November 2021; updated 13 September 2022

Can an industry use old coconut palm trees from plantations as recycled wood?

Coconut fibre is not considered as wood since it is a palm-derived material, despite of its similar commercial and functional properties compared to material from trees. This conclusion is based on the botanical definition that wood is an organic material produced by Dicots species and palms pertain to Monocots group of plants. FSC considers this material as a non-timber forest product where it originates from forests and as non-forest-based material where it originates otherwise. The certification of coconut fibre would be possible in case that the material is produced in a forest-based system (native forest or plantations). Therefore, palms produced from other land use systems are not subject to FSC certification and their material can be included in FSC certified products as non-forest-based material. Also, this material is not eligible to be certified as FSC Recycled, since FSC considers the use of this material as a primary use of the palm trunks and, to be post-consumer reclaimed, it should be necessarily reclaimed from consumers.

Code	INT-STD-40-004_65
Requirement (s)	V3-1, Annex E

Publication date	07 December 2023

Can “dyeing” fabrics be considered “trading” as per the FSC definition of a “trader” in FSC-STD-40-004 V3-1?

Yes, according to the note on the trader definition in FSC-STD-40-004 V3-1, “installation of finished products, kiln drying of wood, filling of packaging, and cutting to size are not considered product transformation”. Dyeing fabric is a minor activity in the primary production of the textile sector, which would not significantly transform the product except for its visual appearance. Therefore, the organization that performs dyeing activity can be considered a “trader”, similar to kiln drying or cutting to size in the wood sector.

FSC-STD-40-006 (V1-0) FSC CHAIN OF CUSTODY STANDARD FOR PROJECT CERTIFICATION

Code	INT-STD-40-006_03 (also published under FSC-STD-40-007 with code INT-STD-40-007_02)
Requirement (s)	V1-0, Clauses 2.3; 5.4d; 6.2; 6.3; 7.2; 8.3; 8.5; 9.1d; 9.2.
Publication date	05 September 2014
Status	Withdrawn

Code	INT-STD-40-006_01
Requirement (s)	V1-0, Clause 9.2.b
Publication date	07 August 2012
Status	Withdrawn

Code	INT-STD-40-006_02
Requirement (s)	V1-0, Part 4
Publication date	05 September 2014
Status	Withdrawn

Code	INT-STD-40-006_04 (also published under FSC-STD-40-004 with code INT-STD-40-004_19)
Requirement (s)	V1-0, Annex 1
Publication date	05 September 2014
Status	Withdrawn

FSC-STD-40-006 (V2-0) FSC CHAIN OF CUSTODY STANDARD FOR PROJECT CERTIFICATION

Code	INT-STD-40-006_05 (also published under FSC-STD-40-004 V3-1 with code INT-STD-40-004_58)
Requirement (s)	V2-0, Section B: Scope & Annex A, definition of ‘Projects’ FSC-STD-40-004 V3-1, Section B: Scope

Publication date	15 September 2022

Which standards can organizations apply when certifying a project?

Organizations should apply FSC-STD-40-006 for the certification of single and multiple projects. However, organizations can opt to apply FSC-STD-40-004 in case it is more adequate for their needs.

Depending on which standards are being applied, the charging mechanism for the Annual Administration Fee (AAF) will differ. In the case of FSC-STD-40-004, the Forest Products Turnover will be used to calculate the AAF, and in the case of FSC-STD-40-006, the overall costs of each project will be used.

For further details on the charging mechanism, please refer to the applicable version of the AAF Policy (FSC-POL-20-005).

FSC-STD-40-007 (V2-0) SOURCING RECLAIMED MATERIAL FOR USE IN FSC PRODUCT GROUPS OR FSC CERTIFIED PROJECTS

Code	INT-STD-40-007_02 (also published under FSC-STD-40-006 with code INT-STD-40-006_03)
Requirement (s)	V2-0, Scope
Publication date	05 September 2014
Status	Withdrawn

Code	INT-STD-40-007_01
Requirement (s)	V2-0, Clause 3.5
Publication date	07 August 2012

Companies that use post-consumer reclaimed material inputs may identify small amount of pre-consumer contamination in the material bundle on receipt. Does this material count as a mixture of pre- and post-consumer reclaimed material and therefore require the supplier to be included in a supplier audit program as per clause 3.5 of FSC-STD-40-007 V2-0?

Where sporadically the buyer of post-consumer material identifies a small amount of unintentional pre-consumer contamination included in the shipment, this is not considered a mix of pre- and post-consumer reclaimed material as described in clause 3.5 of FSC-STD-40-007 V2-0. In this case, the company shall quantify the amount of pre-consumer material contamination and deduct this amount from the post-consumer volume.

Code	INT-STD-40-007_03
Requirement (s)	V2-0, Clause 4.3
Publication date	08 September 2017

Is it acceptable for an organization to purchase a manufactured component of a product (e.g., paper bag handle) or manufactured products made of reclaimed material and to include the manufacturers of the components or products in the supplier audit program?

No, organizations are not allowed to include manufacturers in the supplier audit program. Manufacturers of reclaimed products or product components need to obtain CoC certification.

PROCEDURES

FSC-PRO-20-001 (V1-1) EVALUATION OF THE ORGANIZATION'S COMMITMENT TO FSC VALUES AND OCCUPATIONAL HEALTH AND SAFETY IN THE CHAIN OF CUSTODY

Code	INT-PRO-20-001_01 (also published under FSC-STD-20-011 with code INT-STD-20-011_12)
Requirement (s)	V1-1, Sections 1 and 3
Publication date	11 February 2016; amended 28 April 2016; updated 13 September 2022

How are CBs required to verify that a certificate holder (CH) demonstrates its commitment to comply with the values of FSC as defined in the "Policy for the Association of Organizations with FSC" (FSC-POL-01-004)?

CBs have to verify (audit) the CH's commitment to comply with the values of FSC as defined in the Policy for Association according to FSC-STD-40-004 V3-1 Clause 1.3. This needs to be done by evaluating the existence of a self-declaration signed by the CH (FSC-PRO-20-001 V1-1 Section 3).

See also INT-PRO-20-001_02 for situations of evidenced infringements of the Policy for Association.

Code	INT-PRO-20-001_02 (also published under FSC-STD-20-011 with code INT-STD-20-011_14)
Requirement (s)	V1-1, Sections 1 and 3
Publication date	28 April 2016; updated 13 September 2022

Shall the CB raise corrective action requests (CARs) to a CoC certificate holder (CH) if there is objective evidence for infringements of the Policy for Association?

If the CB witnesses evidence of infringements of the FSC Policy for Association in the audit (FSC-PRO-20-001 V1-1 Section 1) or detects such evidence through other means such as by reviewing (evaluating) complaints, disputes or allegations of nonconformity received from stakeholders (FSC-STD-20-011 V4-1/V4-2 Clause 2.6d/2.6e), the CB shall record the evidence for infringements in the audit report and alert FSC International about a potential non-compliance with the FSC Policy for Association for further evaluation.

The CB shall not raise CARs about infringements of the FSC Policy for Association to the CH as relevant conclusions are the subject matter of FSC International and require a decision by the international FSC Board of Directors.

If, however, the evidenced infringements of the Policy for Association also indicate nonconformities with applicable FSC certification requirements, the CB shall raise CARs accordingly.

DIRECTIVES

FSC-DIR-40-004 DIRECTIVE ON CHAIN OF CUSTODY CERTIFICATION

Code	INT-DIR-40-004_05

Requirement (s)	ADVICE-40-004-03
Publication date	19 May 2014
Status	Withdrawn

Code	INT-DIR-40-004_01 (also published in FSC-STD-40-004 with code INT-STD-40-004_08)
Requirement (s)	ADVICE-40-004-05
Publication date	18 April 2011
Status	Withdrawn (valid as INT-STD-40-004_08)

Code	INT-DIR-40-004_04
Requirement (s)	ADVICE-40-004-06
Publication date	07 August 2012
Status	Withdrawn

Code	INT-DIR-40-004_03
Requirement (s)	ADVICE-40-004-06
Publication date	07 August 2012
Status	Withdrawn

Code	INT-DIR-40-004_02
Requirement (s)	ADVICE-40-004-06
Publication date	22 March 2012
Status	Withdrawn

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