



Standard Addendum

FSC REGULATORY MODULE – GENERAL REQUIREMENTS FOR CERTIFICATION BODIES

FSC-STD-20-001r V1-0



Title: FSC Regulatory Module – General Requirements for Certification Bodies

Dates: **Approval date:** 19 March 2025
Effective date: 1 July 2025

Timeframes: **Transition end date:** 31 December 2026
Period of validity: Until replaced or withdrawn

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Version control

Publication date: 01 April 2025

Version	Description	Date
V 1-0	Initial version	19 March 2025

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INTRODUCTION

The Forest Stewardship Council (FSC) has developed the FSC Regulatory Module to assist FSC certificate holders in aligning their practices with the requirements of Regulation (EU) 2023/1115 (EUDR). The FSC Regulatory Module empowers users to navigate the regulatory landscape effectively, supporting both legal compliance and sustainability best practices. The FSC Regulatory Module sets the framework and requirements to:

- introduce a due diligence system to support EUDR compliance, including information collection, risk assessment and risk mitigation,
- gather and transmit precise information on the origin of products, including geolocation and time of production, and
- ensure that only deforestation-free material enters the FSC chain of custody.

Voluntary add-on module

The FSC Regulatory Module is a set of complementary requirements to add on to existing FSC certification requirements for forest management, chain of custody, project certification and controlled wood.

Independent evaluation

As FSC accredited certification bodies evaluate conformity with the module, organizations opting to be certified against the FSC Regulatory Module are provided with an additional layer of assurance. This standard addendum includes additional requirements for FSC accredited certification bodies which are additions to extending and reducing the scope of certification, surveillance and registering of certification status and issuing certificates. While certification bodies evaluate conformity with the module's requirements, the ultimate decision on EUDR compliance rests with relevant competent authorities.

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A. SCOPE

This standard addendum is for voluntary use by certification bodies to evaluate conformity of organizations applying for or holding FSC certification to extend their certification scope in order to align with the Regulation (EU) 2023/1115 (also referred to in this standard as ‘the Regulation’, ‘this Regulation’ or “EUDR”). Certification bodies may choose whether to offer evaluation against the Regulatory Modules.

Certification bodies may choose whether to offer evaluating The Organizations’ conformity to the FSC Regulatory Module. However, if a certification body chooses to provide this evaluation, conformity with the requirements in <FSC-STD-20-001 General requirements for FSC accredited certification bodies>, and this standard addendum is mandatory.

All aspects of this standard addendum are considered normative, including the scope, effective and validity dates, references, terms and definitions, footnotes, graphics and tables unless otherwise stated. Notes, information boxes and examples are not considered normative.

B. REFERENCES

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

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

FSC-STD-20-001 V4-0 General Requirements for FSC Accredited Certification Bodies

C. TERMS AND DEFINITIONS

For the purposes of this document, the terms and definitions included in <[FSC-STD-01-002 FSC Glossary of Terms](#)>, and the following apply:

Authorized representative: ‘authorized representative’ as defined in the Regulation (EU) 2023/1115, Article 2 (22), is equivalent to any natural or legal person established in the EU who has received a written mandate from an operator or a regulatory trader to act on its behalf in relation to specified tasks with regard to the operator’s or the regulatory trader’s obligations under this standard addendum.

Due diligence statement: A document confirming the implementation of a due diligence system by the operator, which encompasses information collection, risk assessment and risk mitigation measures in accordance with Regulation (EU) 2023/1115 of the European Parliament and of The Council of 31 May 2023. The statement affirms that the operator has conducted due diligence to ascertain that either no risk or only a negligible risk has been identified concerning the compliance of the relevant products in adherence to Article 3, point (a) or (b), and Article 4(2) and 8; of the Regulation (EU) 2023/1115 of the European Parliament and of The Council of 31 May 2023.

Forest: A tract of land dominated by trees (Source: <[FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship Standard](#)>).

Fully verified supply chain: Supply chain where every certificate holder has applied the [FSC Regulatory Module](#) and establishes a product group for the purpose of controlling the Regulatory+ output claim.

Geolocation: ‘geolocation’ as defined in the Regulation (EU) 2023/1115, Article 2 (28) is equivalent to the geographical location of a plot of land described by means of latitude and longitude coordinates corresponding to at least one latitude and one longitude point and using at least six decimal digits.

Micro, small and medium-sized enterprises/SMEs: ‘micro, small and medium-sized enterprises’ or ‘SMEs’ means micro, small and medium-sized undertakings as defined in Article 3 of Directive 2013/34/EU of the European Parliament and of the Council.

SME categories according to [Directive 2013/34/EU of the European Parliament and of the Council](#):

“1. In applying one or more of the options in Article 36, Member States shall define micro-undertakings as undertakings which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:

- a) balance sheet total: EUR 350 000;
- b) net turnover: EUR 700 000;
- c) average number of employees during the financial year: 10.

2. Small undertakings shall be undertakings which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:

- a) balance sheet total: EUR 4 000 000;
- b) net turnover: EUR 8 000 000;
- c) average number of employees during the financial year: 50.

Member States may define thresholds exceeding the thresholds in points (a) and (b) of the first subparagraph. However, the thresholds shall not exceed EUR 6 000 000 for the balance sheet total and EUR 12 000 000 for the net turnover.

3. Medium-sized undertakings shall be undertakings which are not micro-undertakings or small undertakings and which on their balance sheet dates do not exceed the limits of at least two of the three following criteria:

- a) balance sheet total: EUR 20 000 000
- b) net turnover: EUR 40 000 000
- c) average number of employees during the financial year: 250.“

Mitigation measure: The term 'mitigation measure' as mentioned in the Regulation (EU) 2023/1115, Article 11(1) is equivalent to an action that the organization shall take to mitigate the risk of sourcing material from unacceptable sources.

Non-negligible risk: A conclusion, following a risk assessment, that there is cause for concern that material from unacceptable sources may have been sourced or entered the supply chain from a specific geographic area. The nature and extent of this risk is specified for the purpose of defining efficient mitigation measures.

Operator: 'operator' as defined in the Regulation (EU) 2023/1115, Article 2(15) is equivalent to (The) Organization who places relevant products on the EU market or exports them.

Plot of land: 'plot of land' as defined in the Regulation (EU) 2023/1115, Article 2(27) means land within a single real-estate property, as recognized by the law of the country of production, which enjoys sufficiently homogeneous conditions to allow an evaluation of the aggregate level of risk of deforestation and forest degradation associated with relevant commodities produced on that land.

Regulatory Claim: A claim made on sales and delivery documents based on inputs that meet the requirements of FSC Regulatory Module. It can only be used in combination with the FSC claims (except FSC Recycled), e.g., FSC 100% / Regulatory.

Regulatory+ Claim: A claim made on sales and delivery documents based on inputs exclusively with an FSC 100% or FSC CFM/ Regulatory+ claim and where every upstream certificate holder within a fully verified supply chain has applied the FSC Regulatory Module. It can only be used in combination with the FSC 100% or FSC CFM claim.

Regulatory trader: 'trader' as defined in the Regulation (EU) 2023/1115, Article 2(17) means any person in the supply chain other than the operator who, in the course of a commercial activity, makes relevant products available on the EU market. However, in order to avoid confusion with the term 'trader' as defined in <FSC-STD-40-004 Chain of Custody Certification>, FSC uses the term 'regulatory trader' in this standard when referring to a trader in the meaning of the EUDR.

Substantiated concern: 'substantiated concern' as defined in the Regulation (EU) 2023/1115, Article 2(31) means a duly reasoned claim based on objective and verifiable information regarding non-compliance with this Regulation and which could require the intervention of competent authorities.

Supply area: The geographical area from which material is sourced. The supply area does not need to be defined as a single contiguous area; it may comprise multiple separate areas that span multiple political jurisdictions including countries or multiple forest types.

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.

D. ABBREVIATIONS

DDS	Due Diligence System
EEC	European Economic Community
EU	European Union
EUDR	Regulation (European Union) 2023/1115 on Deforestation-free Products
EUR	Euro
FSC	Forest Stewardship Council
ISO	International Organization for Standardization
SME	Micro, Small and Medium-sized Enterprises
UN	United Nations

ADDITIONAL ACCREDITATION REQUIREMENTS FOR FSC-STD-20-001 GENERAL REQUIREMENTS FOR CERTIFICATION BODIES

1 EVALUATION OF THE ORGANIZATION'S DUE DILIGENCE SYSTEM

- 1.1 The certification body shall design and implement a system for evaluating the relevance, effectiveness, and adequacy of the due diligence system (DDS), according to the scope and scale of the organization's operation. The certification body shall specify and justify in its system the means of verification of risk assessments and mitigation measures established by the organization, including, but not limited to:
- a) a mechanism for verifying risk designations against available sources of information and applicable requirements;
 - b) corroborating evidence provided by the organization with independent sources when possible.
- 1.2 The certification body shall evaluate whether the DDS has been implemented as designed and in accordance with all applicable requirements and any additional guidance provided or approved by FSC.

2 EXTENDING AND REDUCING THE SCOPE OF CERTIFICATION

- 2.1 The certification body shall assess their clients' conformity with the applicable requirements of the FSC Regulatory Module, at minimum as a desk-based evaluation, prior to extending the scope of certification.

NOTE: The assessment may be conducted at the regular time scheduled for the next scheduled evaluation or earlier as agreed with the client.

3 SURVEILLANCE

- 3.1 The certification body shall carry out a surveillance evaluation to assess the organization's continued conformity with all applicable certification requirements of this standard addendum at least annually. Surveillance evaluations may be conducted more frequently depending on factors such as:
- a) allegations of nonconformity or integrity risks to the supply chain;
 - b) substantiated stakeholder concerns, indicating that a relevant product that their client has placed on the market is at risk of not conforming with the FSC Regulatory Module or the Regulation;
 - c) notifications by their client about non-compliance detected by the competent authority.
- 3.2 The occurrence of one (1) or more major nonconformities against any certification requirement in FSC Regulatory Module in a surveillance evaluation shall be considered as a breakdown of the clients' management system and the FSC Regulatory Module scope extension of the respective certification shall be suspended within 24 hours of the certification decision being taken.

NOTE: A suspension of the FSC Regulatory Module scope is independent of the certification status of any other FSC certification scope.

- 3.3 The occurrence of organizations' nonconformities related to FSC Regulatory Module shall be considered separately from the nonconformities identified against other forest management, chain of custody and controlled wood and project certification requirements.

- 3.4 During the annual audit, the certification body shall verify that their client informed the competent authority about nonconformities related to non-conforming products and suspensions of the FSC Regulatory Module.
- 3.5 The certification body shall assess a non-compliance detected by the competent authority upon notification by their client and shall suspend the FSC Regulatory Module scope within 24 hours of the certification decision being taken, when confirmed that the non-compliance constitutes a non-conformity with the FSC Regulatory Module.
- 3.6 The certification body shall provide the competent authority access to information related to their clients' conformity with FSC Regulatory Module upon request.



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