



Frequently Asked Questions

FAQ ON FSC RISK ASSESSMENTS

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Title:	FAQ on FSC Risk Assessments
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INTRODUCTION

This document aims to address common questions around FSC Risk Assessments. This FAQ is prepared to aid the development and drafting the Risk Assessments, but also serves as a source of information for any stakeholder interested in these Risk Assessments.

If you are developing a Risk Assessment, request P&P guidance for drafting mitigation measures. A database with good examples of mitigation measures is also being developed and will be shared for consultation in the first half of 2026. For additional questions reach out to country_requirements@fsc.org.

DEVELOPMENT OF A RISK ASSESSMENT DRAFT

Scope, source types and geopolitical scales

1. **How are the geopolitical scales and source types used in the assessment of indicators? Are the indicators analyzed for each geopolitical scale and source type separately? (Updated)**

The indicators are expected to be analysed according to the unique combinations of geopolitical scale and source types that the developer has specified for the risk assessment. For example, there are three geopolitical scales identified (A, B, C) and two source types identified (X and Y). Let's say that the risks for Indicator 12 might be the same ('negligible' risk) for geopolitical scales A and B (and for both source types X and Y found there), but might be 'non-negligible' for source type X within geopolitical scale C. Therefore, this indicator would have three risk designations:

- a) "negligible" risk conclusion for geopolitical scale A and B in combination with source types X and Y,
- b) "negligible" risk conclusion for geopolitical scale C in combination with source type Y, and
- c) "non-negligible" risk designation for geopolitical scale C in combination with source type X.

The source types and the geopolitical scales need to be designed considering key factors that might determine the major risk trends (e.g., size of the forest property, type of ownership, etc.), or in other words, considering relevant distinctions to understand the breakdown of risk in an area. The specific combination of source types and geopolitical scales need to allow homogenous risk designations as per the major risk trends.

2. **Can 'eco-regions' be utilized as geopolitical scales to assess risks?**

Yes, risks can be assessed in eco-regions. Same as with any other geopolitical scale, they should be explained and justified. In general, it needs to be a choice relevant and feasible to the area under assessment, which means that there is enough information to assess risks based on the chosen scale.

3. **Regarding the source types that are coming from outside the forests, also often called the 'non-forest' types (e.g., salvaged wood, agricultural production and residues such as from orchards, urban area and land infrastructure maintenance such as cutbacks of shrubs and trees along roads, in parks etc.), do these types have to be covered by the Risk Assessment as well?**

Yes, all potential source types within the scope of the Risk Assessment are to be included; this includes by default those that have their origin outside the forest lands. There should always be additional information describing the types of material this source type is considering. In the

template, this information must be provided in the “description” column with comments in the “other comments” column.

4. Can the scope of a Risk Assessment be revised during the revision process? (Updated)

The scope is initially redefined by the developer at the beginning of the revision process, based on its and/or other experts' knowledge on the supply chain in that country. Later, this scope, together with all the other content of the risk assessment, is subject to consultation as per the development process for every risk assessment.

In the latest Risk Assessment Template, the commodities impacted always cover products derived from trees, which may or may not include non-timber forest products. If relevant for the geographical scope, bamboo can be considered as an additional impacted commodity. Reclaimed material can never be considered as an impacted commodity in the risk assessments.

5. Should manual forestry work—such as planting, pre-thinning, and soil preparation—be included in the scope of the Risk Assessment, or should it be excluded? (New)

Manual forestry work is not explicitly listed under “management activities” as defined in [<FSC-PRO-60-006b Risk Assessment Framework>](#), but it should be included in the Risk Assessment whenever it creates a relevant risk (particularly for occupational health and safety, workers' rights or environmental impacts) regardless of whether it is bundled with timber trade or not.

Legality component

6. Should all forestry laws for each of the states in the country be listed under ‘Legislation’ tab? (Updated)

While the list of legislation needs not be exhaustive in cases where a very granular geopolitical scale is selected, and in cases where state/provincial/regional law mirrors federal or state policy, the greater detail that can be provided, the better. In general, if regional or local forestry laws differ from national laws and can influence risk designation, then those regional or local forestry laws are also to be considered and listed.

7. When describing the differences in legislation compared to national level in the ‘Geopolitical scale’ tab in the Risk Assessment Template, how much detail is expected to be used for these descriptions? (Updated)

The differences among the laws that directly influence risk designations in the risk assessment are expected to be individually described in this section of the template. State or regional laws that do not influence risk designation can be sampled or grouped with the purposes of referencing general differences between them. Under the column ‘Additional Comments’ in the ‘Legislation’ tab in the Risk Assessment Template can be used for the further identification of differences and similarities between them.

8. When describing the legal requirements in the ‘Assessment of indicators’ tab, is it expected to find a detailed description of each one of the legal requirements pertinent to that indicator? (Updated)

The description of legal requirements should consider all the key legal requirements relevant for the focus of that indicator. When there are numerous laws involved, instead of summarizing each individual law, a broad summary describing how the laws interact and are associated with one another is sufficient.

Risk indicator analysis

9. In some countries, legal requirements are general to all kinds of workers (e.g., all of the human rights). In those cases, should the Risk Assessment only focus on the forestry sector? (Updated)

A focus on forestry workers suits more the purposes of a Risk Assessment, and of course, some aspects that apply in general to all workers (e.g. low minimum wages, "at will" workers contracts, etc.) certainly apply to forestry workers too. It is key to consider:

- a) How well the conditions of workers in forestry-related jobs are situated within the broader picture of risk for the whole country, and
- b) that risks are considered to a range of different kinds of workers in forestry-related industries, where relevant for the scope of the Risk Assessment.

10. How to handle a lack of forestry-sector specific data for indicators?

Broader datasets, including data from related sectors like agriculture and fishing, can be used. However, experts and stakeholders should be consulted for precise insights.

It is expected to have improvements in the future, but for now, we rely on the Best Available Information (BAI). What we have now in the Risk Assessments includes reports from different types of organizations, legislation, information from stakeholders, etc. and in some cases, there is scientific evidence. It is also recommended to include expert knowledge - give attention to talking to experts in the area and researchers who are involved in the topic.

In cases where there are few resources pertaining specifically to a given element (like a source type), besides the above, it is also welcome to include other references that are relevant for coming to a risk conclusion. Assumptions need to be supported by references. For example, in the case of informal firewood collection outside of forests, there may not be any statistics or hard figures, but anthropological studies might provide qualitative documentation of the phenomenon. The relevance of these sources must be carefully justified.

11. Is it correct to conclude that there is good legal compliance when there are continuously reports or surveillance activities from legal authorities? (Updated)

High reporting/surveillance rates may not necessarily indicate better compliance but could reflect more robust law enforcement or legal systems. Experts are expected to evaluate the context in these cases and more compliance-related evidence is expected to be found in the assessment.

12. Is the assessment of the presence of High Conservation Values (HCVs) an integral part of the Risk Assessment (Indicators 58 through 63), or is it sufficient to only indicate the presence or absence of HCVs in the area being assessed?

It is not enough to just indicate the presence or absence of HCV categories in the area being assessed. If the occurrence of the HCV is likely, then that is already a conclusion on HCV, which has to be supported by the available evidence.

It is important to also take into consideration the requirements under Clause 15.9 of <FSC-PRO-60-006b FSC Risk Assessment Framework>: 'Where there is no FSC-approved HCV framework developed as part of the development of an FSS based on FSC P&C V5, an HCV framework for the given country/region shall be developed as part of the Risk Assessment process, including identification of areas where HCV are present and threat(s) to them posed by management activities, according to the requirements of this document.'

Note: Where there is an FSC-approved HCV framework developed as part of the development of an FSS based on FSC P&C V5, and this HCV framework has been modified to ensure its usability for the Risk Assessment, this modified HCV framework must be submitted to P&P together with the Risk Assessment draft as well for their approval.

Risk thresholds and designations

13. How to determine whether a risk threshold has been met for indicators related to legal requirements? (Revised)

The rationale behind the risk thresholds for indicators relating to legal compliance is that when these legal requirements are in place and properly implemented, the risks associated with these activities are reduced.

Clause 13.10 of the [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#), provides more detailed guidance for assessing indicators relating to legal compliance.

14. If there is a ‘non-negligible risk’ conclusion for indicators 10, 11 and 12, does this automatically mean that all other indicators related to legal compliance must also conclude ‘non-negligible risk’? (Updated)

Not necessarily. If the assessment of indicators 10, 11 and 12 concludes ‘non-negligible risk’ designation, this signals a risk of corruption or fraud in the country or region for which the conclusion applies to.

Clause 13.7 of [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#) regulates when a non-negligible risk designation shall be automatically concluded following precautionary approach. This situation shall only apply when both of the following conditions are met:

- a) The assessment of Indicators 10, 11 and 12 conclude that there is a risk of corruption and fraud in the country/region in question; and
- b) Little or no evidence can be obtained to indicate that the risk is negligible.

This means that a non-negligible risk designation for Indicators 10, 11 and 12 does not automatically grant non-negligible risk designation to all other indicators related to legal compliance. Instead, it requires a more careful assessment of these other indicators. If, during those assessments, no additional evidence can be found to demonstrate that the risk is ‘negligible’ (following bullet point ‘b’ above), then the precautionary approach applies and those indicators’ assessments would also have to conclude non-negligible risk designation.

In conclusion, the outcome depends on the availability and quality of evidence for each specific indicator, not on an automatic cascade from the conclusion for the Indicators 10, 11 and 12.

15. When the assessment already concludes one risk threshold has been met, is it still necessary to check all the other thresholds associated to that indicator?

The risk designation requires the evaluation of the information in identified sources against all ‘non-negligible risk’ thresholds associated with each indicator (Clause 13.2 in [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#)).

16. If a territory of a country is temporarily inaccessible (e.g., occupied and the country legislation does not apply at the moment, or there is an area where there is active hostilities where it is impossible to conduct forest management), what should be the assessment logic?

In such case and territories, the risk can be designated as ‘non-negligible’. Each indicator must still be assessed based on available evidence.

17. Should the risk threshold ‘Applicable legislation for the area under assessment contradicts indicator requirement(s)’ also apply to situations when legislation is not strong enough? (New)

The risk threshold ‘applicable legislation for the area under assessment contradicts indicator requirement(s)’ applies to direct conflicts between legislation and indicator requirements, not to cases where legislation is merely insufficient or weak.

Mitigation Measures

18. What is key to consider when drafting mitigation measures? (New)

One must understand the level of criticality for each ‘non-negligible risk’ in the risk assessment before thinking on any mitigation measure. Once the level of criticality is clear, the mitigation measures can be drafted in a way that match that level at the same time they consider how they apply to different types of organizations in the supply chain.

Another key aspect to consider is whether the mitigation measure(s) addresses the risk threshold(s) that apply for that indicator in matter.

If you are developing a Risk Assessment, request P&P guidance for drafting mitigation measures. A database with good examples of mitigation measures is also being developed and will be shared for consultation in the first half of 2026.

19. Is it possible to have several mitigation measures for each ‘non-negligible’ risk?

Yes, it is possible to establish multiple mitigation measures for each indicator. As specified under clause 14.5 in FSC-PRO-60-006b FSC Risk Assessment Framework: ‘Mitigation measures shall be established according to each risk and source type identified.’

20. Is compliance with the applicable legal requirements an adequate mitigation measure for an identified risk issue related to, for example, health and safety? (New)

Compliance against updated legislation alone is not considered an adequate mitigation measure. However, it can serve as supporting contextual information when developing mitigation measures. In some cases, if the updated legislation directly addresses the issue that led to the non-negligible risk, it may contribute to mitigation of this particular risk. Ultimately, whether legislation is sufficient or not depends on the indicator: some indicators explicitly require compliance against legal requirements, while others go beyond legal compliance and therefore, demand additional measures.

21. How should different actors in the supply chain be defined for mitigation measures, and how can requirements differ between primary producers and downstream companies? (e.g., when field verification is needed) (New)

When defining different actors in the supply chain, it is important to distinguish clearly between primary actors (e.g., primary producers with direct access to the forest) and downstream actors (e.g., processors, traders, or retailers).

Key considerations include:

- 1) Ability to implement mitigation measures: Some measures may be feasible for primary actors but burdensome or impossible for downstream actors.
- 2) System clarity: A clear, structured system is needed so that all companies—especially downstream—can understand and comply with their responsibilities.

When field verification is required due to the high severity of the risk, primary actors may be expected to conduct on-site checks because they have direct access to the forest. Downstream actors, however, may not be able to visit the site. In these cases, they can apply alternative measures that achieve the same level of assurance without requiring physical access. Examples include: GIS-stamped photographs of the relevant forest area, formal confirmation documents issued by those who performed the field verification, supplier audits, and remote verification or document reviews.

The guiding principle is *equivalence of outcome*, not uniformity of action. Different actors may take different steps, but the resulting level of assurance must be comparable among all actors in the supply chain.

22. When defining mitigation measures, is the duration of a supply chain (how much time it has been in place) a relevant factor when determining what can reasonably be requested from actors further downstream in the supply chain? (New)

The duration of a supply chain is not always a determining factor, but it can be relevant depending on local circumstances. Long-standing supply chains often have established relationships, clearer

communication channels, and more consistent documentation, which can make certain low-effort actions like supplier interviews, easier to implement. In contrast, newer or more informal supply chains may require more intensive engagement and additional evidence to achieve the same level of assurance.

23. Can we develop different mitigation measures for companies aiming to comply with EUDR versus those only conforming against controlled wood?

The entire Risk Assessment Framework is already aligned against EUDR requirements. Risk mitigation measures relevant to EUDR therefore exist for those indicators that are relevant to EUDR.

Refer to the [<FSC-GUI-40-005 V1-0 EN Crosswalk of indicators between Risk Assessment Framework V1-0 and V2-0>](#) for more information on the EUDR related indicators.

24. When is it acceptable to use 'Buy Certified' and 'Don't buy' as mitigation measures? (New)

'Buy certified' excludes mixing forest products from non-certified sources. That means there is no mitigation measure to address the risk of mixing material from non-certified sources since it relied only on 'certification'. 'Buy certified' a mitigation measure can only be chosen if it is the only identifiable mitigation measure, i.e. no other ways of mitigating relevant risks than sourcing FSC certified material from a given country, geopolitical scale, or source type could be identified.

'Do not buy' is not acceptable as a general mitigation measure. 'Do not buy' is acceptable only in extreme cases where it is not possible to implement other mitigation measures. This could be the case, for example, when part of a country is not under the government administration and, hence, no mitigation measure can be taken.

Use of the Risk Assessment Template

25. Is it possible to modify the template (e.g., adding columns, renaming sections and drop down list options, etc.)?

Please do not modify the template. The template is designed in a specific way that it works as input for automatically upload on to digital tools, like the [FSC Risk Hub](#).

26. How many references are required, or is there a minimum?

There is no minimum of references required by the Risk Assessment Framework. It is up to the developer to decide. Do not use data more than 5 years old, unless very well justified.

It is important to take into consideration that the consultation with experts is required. As specified in Clause 2.6 [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#):

'The process lead shall consult experts on the draft Risk Assessment (including but not limited to selected indicators), if:

- a) there are limited publicly available sources of information to evaluate the indicator and to reach a risk conclusion;
- b) there are doubts on how risk conclusions shall be graded (e.g., whether the risk is widespread, systematic, etc.); and
- c) input is needed to establish mitigation measures.'

Note: The expert consultation is recommended even if the above criteria are not met.

27. How to reference the recommended sources under 'Recommended Sources' tab in the Risk Assessment Template? (Updated)

The recommended source and its information needs to be entered in the 'References' tab as a new reference in order to be possible to select it in the 'Assessment of indicators' tab.

28. If I change a short title of a reference or a legislation in ‘References’ or ‘Legislation’ tabs, how can I see the updated title in the ‘Assessment of indicators’ tab? (Updated)

If a source type, geopolitical scale, reference, legislation, or expert name is changed in the tabs that feed into the ‘Assessment of Indicators’ tab, the value in the cell will not be updated automatically, but the drop-down menu will be updated. Once changes are made, go again to the relevant cell and select the new name from the appropriate drop-down menu.

29. How to reflect different risk designations based on different source types (e.g., for different ownerships) for a single indicator? (Updated)

Include one row for each risk designation that involves a different combination of geopolitical scale and source types. The new row has to refer to the same indicator.

The complexity of how many rows are needed per indicator depend on the complexity of how risk breaks down according to source types and geopolitical scales.

30. Can we include annexes in the Risk Assessment to provide more justification for assessments?

While we encourage you to include as much information as possible in the Risk Assessment template directly, there are some limited instances where Annexes could be appropriate. Please contact country_requirements@fsc.org to request to add Annexes.

31. In the Risk Assessment template, when the risk conclusion is ‘negligible risk’, which risk threshold has to be chosen?

If the risk conclusion is ‘negligible risk’, do not select any threshold (leave it in blank), as none of the thresholds applies.

32. How can an indicator be marked as ‘not applicable’ in the template and where should the justification for its non-applicability be added?

The indicator can be selected from the template as normal – by selecting the indicator category and the indicator from the list. In the “Risk Conclusion” column, select “not applicable”. Justification has to be included in the “Long description of issue/risk” column and summarized in the “Short description of risk” column. In this case, these two columns would be used to explain why the indicator is not applicable within the scope of the Risk Assessment.

Use of the other documents

33. Does the <PSU-PRO-10-002 V2-0 The Development and Approval of FSC® Centralized National Risk Assessments> still apply?

No. Only <FSC-PRO-60-006b Risk Assessment Framework> applies for Risk Assessments.

34. How should the FSC Forest Stewardship Standard of a country be taken into account when developing or revising a Risk Assessment?

As specified in Clause 15.8 of the <FSC-PRO-60-006b Risk Assessment Framework>:

‘FSC-approved HCV frameworks (or parts thereof) that have previously been developed as part of the development of an FSC Forest Stewardship Standard (FSS) based on FSC Principles and Criteria version 5 (FSC P&C V5) shall be used as a primary source of information about HCV presence and threats in the Risk Assessment, provided they meet the requirements of this document.’

In addition, Clause 13.11 of the same procedure, indicates that:

‘In cases where the country/region already has an approved FSS, the Risk Assessment should cross reference the relevant and up-to-date legislation identified in the FSS for the country/region under assessment.’

The FSS HCV framework in the conditionally approved FSS can also be considered. FSC-approved HCV frameworks (or parts thereof) that have previously been developed as part of the development of an FSC Forest Stewardship Standard (FSS) based on version 5 or higher of <FSC-STD-01-001 FSC Principles and Criteria for Forest Stewardship> can be used as a primary source of information about HCV presence and threats in the Risk Assessment, provided they meet the requirements of <FSC-PRO-60-006b Risk Assessment Framework>. For the FSS HCV framework in FSS draft awaiting approval, the latest approved version based on FSC Principles & Criteria V5 or higher has to be used.

Finally, it is worth highlighting that when revising the Risk Assessment, it is important to check the alignment between the results of a Risk Assessment and those of an FSS. For example, for the case of presence of Indigenous Peoples, Traditional Peoples, or local communities.

35. In which cases are maps not compulsory to provide together with the draft?

Maps as such, are strongly encouraged to use in the <FSC-PRO-60-006b FSC Risk Assessment Framework>. Geographical data is compulsory to provide at the level of geopolitical scale. For example, if there are five provinces in a country, and 'province' is a relevant distinction to understanding the breakdown of risk in a country, those five provinces would each be listed on the 'Geopolitical Scale' tab and geographical data provided for each – regardless of whether risk is different or the same. Several geopolitical scales might present the same source types, and the same levels of risk, but it is still required to submit geographical data for each geopolitical scale. Developers receive guidance from FSC on how to submit geographical data for the risk assessment.

36. Can we reference other Risk Assessments?

Other Risk Assessments may be consulted – please include them in the References tab of the Risk Assessment template and reference them accordingly. Differences between the Risk Assessment currently being drafted and previous Risk Assessments in the country should be considered in the Review Report, and any important differences or changes should be noted.

37. Is it mandatory to use the FSC's Forest Degradation Risk Assessment (tree cover loss maps) within the Risk Assessments?

The risk designation provided by the GIS tool (and its degradation map) is not binding, but the following is to be considered:

- a) The risk designation of Indicator 57 (forest degradation) provided by the FSC GIS tool should be considered as a starting point and initial input for the Risk Assessment to be conducted by the consultants.
- b) If the consultants have a more robust approach to assess the risk for forest degradation, they can assess the risk with their own approach.
- c) Consultants' own approach can be of two types:
 - c.1) **An approach using geospatial data:** The consultants should provide their assessment and the geospatial data using an Excel file (in this case, please contact the Country Requirements team at country_requirements@fsc.org). FSC teams will then assess the approach and the data used, in line with the review process conducted by the Country Requirements team for all other indicators as part of the regular Risk Assessment process.
 - c.2) **An approach relying on other evidence:** In this case the consultants should provide their assessment (e.g. reports, published literature, etc.) to the Country Requirements team. The Country Requirements team will assess the approach and evidence used.

Regardless of the consultant's own approach used, the consultants are strongly encouraged to contribute with additional data other than the one used with the GIS tool, to support with ground truthing the FSC GIS tool and make it more robust and relevant. Particularly, confirmed occurrence of planted forests, plantations, other wooded lands, natural forest and primary forests

are relevant. These data and additional data sources can be shared in the form of shapefiles or raster to country_requirements@fsc.org.

Involved parties

38. Who are the developers of FSC Risk Assessments?

Either the Network Partner (NP) or the consultants who are responsible for developing or revising the Risk Assessment. Developers of Centralized Risk Assessments are consultants jointly selected by an FSC NP and FSC's Policy and Performance Unit (P&P). Developers in major processes are FSC Network Partners).

39. If the Risk Assessment development process begins with a consultant, can the Network Partner be involved in the exchanges with FSC International during the review? (New)

FSC International ensures that Network Partners are involved throughout the entire Risk Assessment development process, including reviewing the first draft before consultation. In line with [FSC-PRO-60-006b Risk Assessment Framework](#), consultants are contractually required to consult the Network Partner during the consultation period, but their engagement depends on their availability.

40. Can the first draft shared with Network Partners (NP) be shared with other stakeholders, like a standard development group (SDG), for input?

Yes, the respective Network Partners can share it confidentially with SDG for inputs.

41. What if there is disagreement among stakeholders regarding risk categorization?

Consultations and balanced discussions, supported by evidence, should guide final decisions.

42. How are consultations supported by FSC International and FSC Network Partners? (Updated)

There is a direct access to consultations available from the FSC website and the opportunity for stakeholders to express interest and participate in consultations has been made more accessible. In addition, the FSC Network Partners and national representatives play an important role to ensure engagement of key stakeholders by providing information to the consultants and feedback on the proposed list of stakeholders.

43. How can stakeholders contribute to improving Risk Assessments?

Developers of Risk Assessments can engage with local experts, researchers, and consultants who can provide critical insights. National reports and best available information (BAI) are essential too for the development of assessments. Stakeholders can participate in public consultations and stay informed on upcoming consultations by visiting and signing up in our [FSC Country Requirements Schedule](#).

EUDR (EU DEFORESTATION REGULATION) AND RELATED INDICATORS

44. Is there a concrete example on how companies can use Risk Assessments to comply with the EUDR? (Updated)

Examples of revised Risk Assessments that contain the new indicators aligned with the EUDR can be found in the [FSC Risk Hub](#) or in the [FSC Document Centre](#).

45. Who can use the Simplified Risk Assessment?

The Simplified Risk Assessment can only be used by FM/COC and COCs in FSC 100% supply chains. The reason why the Simplified RA is pre-filled is because the assessment of risk is built off the FSC's International Generic Indicators (IGIs).

46. If FSC-Mix label in paper and pulp is a mix from FSC100% + FSC Recycled, can we use the Simplified Risk Assessment?

Yes, because the FSC Recycled is exempt from EUDR.

47. Why does the FSC Regulatory Module require the use of the Risk Assessment Template set by FSC, which include either 57 or 64 indicators, while the EUDR regulation only requires the use of 14 indicators?

It's a misconception that EUDR only has 14 indicators. Once you look at the definition for 'relevant legislation' you see how the list of indicators grows.

48. How do we assess 'non-negligible' vs. 'negligible' risks under the EUDR framework (Indicators 55 through 57)? (Updated)

The Risk Assessment should be evidence-based, using satellite imagery, official permits, and forest management plans where applicable. For negligible risks, excessive bureaucracy without added value should be avoided.

Indicator 55: For Indicator 55, an advice note [<ADV-PRO-60-006b_01 Assessment of conversion of natural forest and transformation of plantations to agricultural use>](#) inside the [<FSC-DIR-60-006 EN FSC Directive on FSC Country Requirements>](#) withdraws the precautionary approach for the assessment of this indicator in clauses 16.3 and 16.4 of [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#) and brings revised definitions of and notes under the 'non-negligible risks' thresholds for this indicator.

Indicator 57: The definition of the term 'natural forest' is based on FSC's definition, but the approach to assess this indicator is based on the EUDR requirements for 'forest degradation'. For the data, FSC GIS tool should be considered as a starting point and initial input for the Risk Assessment to be conducted by the consultants. If the consultants have a more robust approach to assess the risk for forest degradation, they can assess the risk with their own approach.

The Consultants' own approach can be either of the two types summarized below:

- An approach using geospatial data.

In this case, the consultants should provide their assessment and the geospatial data to FSC's Policy and Performance Unit (P&P). P&P will provide a template for uploading this data.

- An approach relying on other evidence.

In this case, the consultants should provide their assessment in the Risk Assessment Template in the rows corresponding to the indicator assessment (e.g. reports, published literature, etc.).

49. On the Simplified Risk Assessment Template, the numbers run from #1 to #57, but in fact, 9 indicator numbers are missing (#15, 23, 28, 30, 32, 37, 39, 41, 56) in between. Why is this the case?

The numbering is off because we had to keep the indicator numbering consistent. The indicators in the Simplified Risk Assessment that are missing are not related to EUDR so they are not included. The Simplified Risk Assessment is only used for EUDR alignment through the Regulatory Module.

50. Why does FSC consider transformation from plantations to agricultural use as conversion?

Indicator 55 relates to conversion from natural forest to agricultural use and to transformation of plantations to agricultural use. The [<FSC-GUI-40-005 V1-0 EN Crosswalk of indicators between Risk Assessment Framework V1-0 and V2-0>](#) explains that Indicator 55 ensures the alignment of the Risk Assessment Framework with EUDR requirements. The definition of 'forest' that applies to the EUDR is the reason why FSC considers both conversion of natural forest and transformation of plantations.

51. Can the Risk Assessment Framework be used by Promotional License Holders and others to assess risk in their EUDR and non-EUDR supply chains?

Yes, the FSC Risk Assessment Template (based on [<FSC-PRO-60-006b FSC Risk Assessment Framework>](#)) is a tool that can be used by anyone to assess a comprehensive list of risks in their supply chain.

REVIEW OF RISK ASSESSMENTS

52. How FSC Risk Assessments are updated? (Updated)

Annual reviews for each Risk Assessment are conducted to incorporate new data essential to refine Risk Assessments and include improvements based on evolving conditions. In addition to annual reviews, a full review is conducted every five years to assess the need for a revision process for that Risk Assessment. Major updates to each Risk Assessment occur during the revision process.

53. Does the annual review of the Risk Assessment also serve a calibration function? For example, adjusting risk levels or mitigation measures based on additional or targeted evidence gathering? (New)

Yes. The annual review process does allow for calibration in the sense of verifying whether existing information remains valid and determining whether risk level or mitigation measures need adjustment when significant contextual changes are identified. Stakeholders can submit feedback on approved and published Risk Assessments through the [FSC Risk Hub](#)'s 'Feedback' button. Stakeholders can submit updates to legislation, evidence supporting risk designations, or input on mitigation measures—and this input is evaluated annually to determine whether revisions are needed immediately or can wait until the next scheduled update (revision).

54. Who is responsible for conducting the annual reviews of Risk Assessments? (New)

According to the draft version of FSC-PRO-60-006 currently under development, the Network Partner (NP) is designated as the organization responsible for carrying out the annual review and identified as the default body for this task.

55. Is there a template for the first deliverable “Reviewed draft/report”?

Yes. The template is provided by FSC's Policy and Performance Unit (P&P) to the process lead at the beginning of the development/revision process.

56. Does the review period start from the approval or the effective date?

This will be regulated by the revised [FSC-PRO-60-006](#) on process requirements for Country Requirements, which is currently under development.

57. What form will the review process take (e.g., chamber-balanced Development Group, expert panel involvement, public consultation requirements, P&P role)?

The review is conducted by the responsible body (e.g., FSC Network Partner, FSC Regional Office, P&P). This will be regulated in FSC-PRO-60-006.

58. How do we handle areas where the situation is rapidly changing (e.g., temporary occupations, contamination in forest due to war situation, etc.), making data collection for review difficult?

In such cases, a tailored approach is required. Proposals include creating automated systems to regularly update data (e.g., GIS) and focusing on chronic vs. acute issues when prioritizing risks.

MISCELLANEOUS

59. Where a Risk Assessment doesn't yet exist, is it possible to use the existing Controlled Wood Risk Assessment as a guidance to do a full Risk Assessment?

That is one approach. Some of the information in the existing National Risk Assessments (NRA) is still valid, but anyone using an existing NRA to conform with the <FSC-PRO-60-006b FSC Risk Assessment Framework> needs to make sure the information they are transferring is accurate. The responsibility is the certificate holder's not FSC's.

60. Where can I find the latest timeline of Risk Assessments' developments?

The timelines for all the FSC Risk Assessments can be reviewed online at the FSC Country Requirements Schedule.

61. What is the expected timeframe from approval/publication to the effective date of a Risk Assessment?

An approved Risk Assessment shall become effective on the date of publication as per Clause 7.2 of <FSC-PRO-60-006b FSC Risk Assessment Framework>.

62. When do we need to use the full Risk Assessment? Always when controlled wood is used instead of FSC-certified product?

Certificate holders use the full Risk Assessment Template (based on <FSC-PRO-60-006b FSC Risk Assessment Framework>) when there is no existing FSC Risk Assessment and they need to conduct an Extended Company Risk Assessment to add the FSC Regulatory Module or maintain their Controlled Wood certification after 2025.

63. How does FSC address acute issues like war in Risk Assessments?

Acute issues may require a derogation system, while chronic risks should be the focus of the Risk Assessments. This distinction ensures appropriate resource allocation.

64. Where can one find the verifiers in the Risk Assessments?

In Risk Assessments we do not have verifiers per se. Also, in FSC the verifiers are not normative. The indicators of the Risk Assessment framework are available on page 34 of the <FSC-PRO-60-006b Risk Assessment Framework>

65. Regarding the topic of degradation: What does the term 'planted forest' mean? Is there a definition by FSC?

The requirements for assessing risk pertaining to forest degradation uses the approach included in the EUDR. The definition for forest degradation included in <FSC-PRO-60-006b Risk Assessment Framework> comes from the EUDR, which includes the term 'planted forest.' According to the EUDR, 'planted forest' means forest predominantly composed of trees established through planting and/or deliberate seeding, provided that the planted or seeded trees are expected to constitute more than 50 % of the growing stock at maturity; it includes coppice from trees that were originally planted or seeded.

66. Can the procedure FSC-PRO-60-002a be used instead of the <FSC-PRO-60-006b Risk Assessment Framework>?

The use of <FSC-PRO-60-006b Risk Assessment Framework> is required system-wide as of 2026, in accordance with Advice Note 40-005-27 in <FSC-DIR-40-005 Directive on FSC Controlled Wood>.



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