



Standard Addendum

FSC REGULATORY MODULE – CHAIN OF CUSTODY EVALUATIONS

FSC-STD-20-011r V1-0



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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. Additional requirements for FSC-accredited certification bodies to conduct chain of custody evaluations in this standard addendum include additions to evaluation requirements, evaluation at the level of the operational site, surveillance evaluation, certification decision, evaluation of controlled wood, evaluation of the organizations due diligence system under chain of custody, reporting requirements and evaluation of FSC Trace. 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 Chain of Custody or Project certification to extend their certification scope in order to align with the Regulation (EU) 2023/1115 (also referred to in this standard addendum as 'the Regulation', 'this Regulation' or "EUDR").

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>, <FSC-STD-20-011 Chain of Custody Evaluations>, <FSC-STD-20-001r Regulatory Module - General Requirements for Certification Bodies> and this standard addendum is mandatory.

Those certification bodies that choose to evaluate organizations against this standard addendum, shall include controlled wood sourcing for chain of custody in their scope of accreditation.

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	General Requirements for FSC Accredited Certification Bodies
FSC-STD-20-011	Chain Of Custody Evaluations
FSC-STD-20-001r	Regulatory Module - General Requirements for 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.

Negligible risk: A conclusion, following a risk assessment, that there is no cause for concern either that material from a specific geographic area originates from unacceptable sources, or that material is mixed with non-eligible inputs or material with a different origin in such a way that would not allow the level of risk related to origin to be confirmed as negligible.

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 addendum 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
EU	European Union
EUDR	Regulation (European Union) 2023/1115 on Deforestation-free Products
EUR	Euro
FPIC	Free, Prior and Informed Consent
FSC	Forest Stewardship Council
ISO	International Organization for Standardization
MU	Management Unit
REG	Regulatory Claim
REG+	Regulatory+ Claim
SME	Micro, Small and Medium-sized Enterprises
UN	United Nations

ADDITIONAL ACCREDITATION REQUIREMENTS FOR FSC-STD-20-011 CHAIN OF CUSTODY EVALUATIONS

1 EVALUATION AT THE LEVEL OF THE OPERATIONAL SITE

- 1.1 The certification body evaluation shall include a review of information obtained, including complaints, disputes, or allegations, that would point to a risk of nonconformity with the FSC Regulatory Module. [Clause 2.6 e) FSC-STD-20-011]
- 1.2 The certification body evaluation shall include a sample of purchasing and sales documentation in the scope of the FSC Regulatory Module. The certification body shall record the corresponding due diligence statement reference number(s). The sampling shall be carried out according to the scope, scale, intensity, and risk of the organization's operation. [Clause 2.6 g) FSC-STD-20-011]
- 1.3 The certification body shall evaluate and confirm the plausibility of the supplementary information and evidence associated to the purchasing and sales documentation.

NOTE: To confirm the plausibility means that the evidence can be corroborated by independent sources (e.g., verifiable public sources).

- 1.4 The certification body shall confirm that the inputs used in the product groups, covered by the FSC Regulatory Module, were supplied with a regulatory claim (if applicable).

2 CERTIFICATION DECISION

- 2.1 For evaluations in the scope of the FSC Regulatory Module, major nonconformities may be caused by failure of the organization to conform to any of the applicable requirements, including but not limited to examples provided in Box 1.

Examples of major nonconformities to the requirements of the FSC Regulatory Module include:

- a) missing or incorrect information in the sales documentation (including supplementary documentation) relating to the FSC Regulatory Module (e.g., geolocation of the plot(s) of land, date or time range of production);
- b) ineffective segregation measures resulting in mixing of Regulatory material with non-eligible material;
- c) false or incorrect regulatory claims on non-eligible material;
- d) absence of, or failure to implement, a complaint procedure;
- e) evidence that the organization has manipulated information regarding the compliance with timber legality legislation;
- f) failure to provide the necessary assistance to the competent authorities.

Box 1. Examples of major nonconformities for evaluation of the FSC Regulatory Module (informative guidance).

3 EVALUATION OF CONTROLLED WOOD ACCORDING TO FSC-STD-40-005

- 3.1 The certification body shall verify whether information on material and supply chains allows the organization to confirm the origin of the material to the plot of land and verify the time of production. [Clause 6.5 FSC-STD-20-011]

4 EVALUATION OF THE ORGANIZATION'S DUE DILIGENCE SYSTEM UNDER CHAIN OF CUSTODY

General requirements

- 4.1 The certification body shall verify whether information on material and supply chains allows the organization to:
- a) confirm the origin of the material to the plot of land;
 - b) conduct a risk assessment related to the origin of the material;
 - c) conduct a risk assessment related to mixing material with non-negligible inputs in supply chains;
 - d) develop and implement mitigation measures mitigating or avoiding the risk(s);
 - e) review and, if necessary, revise the DDS to ensure its relevance, effectiveness, or adequacy.

NOTE: This includes verification of whether the organization has enforced its suppliers to notify it of any changes affecting risk designation or mitigation.

- 4.2 All records used for evaluating the DDS shall be sampled at random. When selecting documents for sampling, the certification body shall not be guided or influenced by staff of the organization.

- 4.3 The certification body shall specify and justify the sampling rate of data, including, but not limited to:

- a) history of nonconformities;
- b) any information received by the organization and/or the certification body that would point to a risk of nonconformity;
- c) complexity and length of supply chains;
- d) participation in a fully verified supply chain.

NOTE: The history of nonconformities refers not only to those in the scope of the FSC Regulatory Module, but also to the organization's management control, including the identified critical control points.

- 4.4 The certification body shall verify the accuracy of the data used to support the organization's due diligence and shall determine additional means of verification when there's a risk of nonconformity with the certification requirements.

NOTE: Field verification (audits at the forest level and on-site verification of suppliers/sub-suppliers) may be necessary to verify the accuracy of the data.

- 4.5 Except for FSC 100% or FSC CFM input materials, the certification body shall approve the organization's DDS for the existing supply area, and/or extended to new supply areas, covering the risk assessment process for the risk of origin and the risk of mixing, risk designation, and corresponding mitigation measures (where applicable).

NOTE: The certification body is still required to verify the organization's DDS for FSC 100% or FSC CFM input material at each audit and to assess the changes between audits.

- 4.6 The certification body shall approve a reviewed and revised DDS where there is a change in the risk designation from non-negligible to negligible risk, whether or not at the annual evaluation.

Risk assessment related to origin

- 4.7 The certification body shall verify the correct use of applicable FSC Risk Assessment(s).
- 4.8 The certification body shall verify whether the organization's risk assessment and risk designations are adequate and justified, including whether:
- a) the risk assessment follows all applicable requirements of <FSC-PRO-60-006b V2-0 Risk Assessment Framework>;
 - b) the sources of information used are independent, objective, and sufficient to justify risk designation;
 - c) the geopolitical scale of the assessment is adequate to the supply area(s);
 - d) the risk designation is justified and verifiable based on sources used;
 - e) the risk specification includes sufficient information to allow the development of adequate mitigation measures.
- 4.9 The certification body shall verify whether the organization has reviewed and revised its risk assessment where necessary, to ensure the continued correctness and relevance.

Risk assessment related to mixing material

- 4.10 The certification body shall verify whether the risk assessment related to the mixing of material with non-eligible inputs during transport, processing, and storage before the material reaches the organization is adequate to the scope of the DDS and justified.

Evaluation of risk mitigation

- 4.11 The certification body shall verify the implementation and the adequacy of mitigation measures, including:
- a) a sample of each type of mitigation measure for each type of risk identified in the DDS. The sampling rate shall be established and justified by the certification body according to the scope of the DDS;
 - b) results of internal and external audits by the organization;
 - c) comments, complaints, appeals, substantiated concerns, and any information received by the certification body;
 - d) the process of review and revision of the DDS by the organization.

5 REPORTING REQUIREMENTS

NOTE: The requirements in this section are additional to Section 12, Table B of <FSC-STD-20-011 Chain of Custody Evaluations>.

- 5.1 As applicable, FSC-STD-40-004r or FSC-STD-40-006r (including the version number) shall be added as an applicable FSC standard to item 2 e).
- 5.2 A brief description of the system by which the organization maintains control of all product groups in the scope of the FSC Regulatory Module shall be added to the Evaluation findings in item 4 a) and item 5 a).
- 5.3 The certification body shall describe the evaluation of the FSC Regulatory Module requirements, including the following as a minimum:
- a) description of the DDS;
 - b) information made publicly available by the organization, or references to such (according to Section 12 of <FSC-STD-40-004r FSC Regulatory Module – Chain of Custody Certification>

or Section 11 of <FSC-STD-40-006r FSC Regulatory Module – Project Certification>). This information shall be available for the period of validity of the certificate;

- c) information about who has developed the DDS or elements of it, including whether the DDS was developed by an external party;
- d) brief summary of the risk mitigation measures applied by the organization, where applicable;
- e) brief summary of findings from field verification(s) (including audits at the forest level and on-site verification of suppliers in the supply chain), with justification for the sampling rate applied, where applicable.



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