



Standard Addendum

FSC REGULATORY MODULE - FOREST MANAGEMENT GROUPS

FSC-STD-30-005r 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.

Using the FSC Regulatory Module

The module includes requirements for different certification types and user groups. It benefits organizations that are required to comply with EUDR by translating legislative requirements into certification requirements on top of their existing certification. The FSC Regulatory Module can also be used by non-EU based certificate holders who would like to ensure their products can be easily placed on the EU markets by operators.

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. While certification bodies evaluate conformity with the module's requirements, the ultimate decision on EUDR compliance rests with relevant competent authorities.

Relevant claims

Organizations adopting the FSC Regulatory Module can make use of a Regulatory Claim on sales documents for certified products signifying adherence to rigorous standards. When the organization is certified against the FSC Regulatory Module, it can make promotional statements about conducting the EUDR-required due diligence with support from FSC's robust system.

Streamlining your EUDR compliance journey with FSC

As FSC certificate holders embark on the journey of harmonizing their practices with the demands of the EUDR, the FSC Regulatory Module stands as a bridge, connecting rigorous responsible forestry practices with regulatory expectations. By embracing this module, users not only reaffirm their commitment to environmental and social responsibility but also contribute to the overarching goal of eradicating illegal timber trade within the European Union and beyond. FSC provides also other tools that can be used in conjunction with the FSC Regulatory Module, such as FSC Trace. See FSC website connect.fsc.org for more information.

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A. SCOPE

This standard addendum is for voluntary use by organizations applying for or holding FSC forest management (FSC FM) or FSC controlled forest management (FSC CFM) group 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”).

Organizations choosing to apply this standard addendum shall demonstrate conformity with <FSC-STD-30-005 Forest Management Groups> and all applicable requirements of this standard addendum according to their scope of FSC certification, and according to their type of organization as per Regulation (EU) 2023/1115.

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

This standard addendum focuses on wood and rubber. If other commodities falling under the scope of Regulation (EU) 2023/1115, such as cocoa or coffee, are included in the scope of FSC certification, The Organization is also required to demonstrate conformity for these commodities.

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-30-005 V2-0 Forest Management Groups Standard

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:

Agricultural use: Use of land for the purpose of agriculture, including for agricultural plantations and set-aside agricultural areas, and for rearing livestock (Source: [Regulation \(EU\) 2023/1115, Article 2\(5\) on deforestation-free products](#)).

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.

Degradation: Changes within a natural forest or High Conservation Value area that significantly and negatively affect its species composition, structure and/or function, and reduces the ecosystem's capacity to supply products, support biodiversity and/or deliver ecosystem services (Source: [<FSC-POL-01-007 Policy to Address Conversion>](#)).

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

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% / Regulatory+ 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% claim or FSC CFM claim.

Relevant legislation of the country of production: 'relevant legislation of the country of production' as defined in the Regulation (EU) 2023/1115, Article 2(40) means the laws applicable in the country of production concerning the legal status of the area of production in terms of:

- a) land use rights;
- b) environmental protection;
- c) forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting;
- d) third parties' rights;
- e) labour rights;
- f) human rights protected under international law;

- g) the principle of free, prior and informed consent (FPIC), including as set out in the UN Declaration on the Rights of Indigenous Peoples;
- h) tax, anti-corruption, trade and customs regulations.

Relevant products: 'relevant products' refers to products listed in Annex I of the Regulation (EU) 2023/1115.

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

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

ADDITIONAL REQUIREMENTS FOR FSC-STD-30-005 FOREST MANAGEMENT GROUPS CERTIFICATION

Informative guidance

This standard addendum includes additional requirements to forest management groups certification for conformity with the FSC Regulatory Module. It covers requirements for group entities, group rules, division of responsibilities and internal monitoring system.

How to find applicable requirements:

To help understand which clauses are applicable, refer to the chart on the right to identify the applicable icon based on your organization type. In the context of this standard addendum, organization types are based on operator and SME classifications. Definitions of organization types are provided in the Terms and Definitions section at the beginning of the document.

■	Non-SME Operators
□	SME Operators

Table 1. Icon key based on organization type.

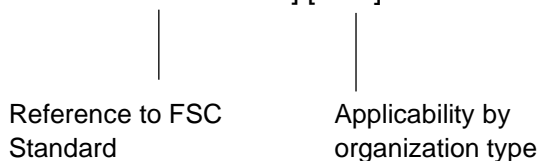
NOTE: A single organization can either be classified as SME or Non-SME. However, an organization may act as an operator or a trader at the same time, depending on the position in the supply chain. The type of organization might further differ between different product groups.

Organizations falling outside the scope of EUDR but opting for the use of the FSC Regulatory Module are required to select their relevant organization type, based on whether they are an SME or a non-SME.

How to read the clauses:

How to read the clauses:

- 1.1 The FSC Regulatory Module can only be included in the scope of a forest management group or controlled forest management group if all members of the group are using the FSC Regulatory Module and demonstrating conformity with the applicable requirements in <FSC-STD-60-004r FSC Regulatory Module – International Generic Indicators> or <FSC-STD-30-010r FSC Regulatory Module – Controlled Forest Management>, and this standard addendum. [Clause 1.4 FSC-STD-30-005] [■ □]



1 REQUIREMENTS FOR GROUP ENTITIES

- 1.1 The FSC Regulatory Module can only be included in the scope of a forest management group or controlled forest management group certification if all members of the group are using the FSC Regulatory Module and demonstrating conformity with the applicable requirements in <FSC-STD-60-004r FSC Regulatory Module – International Generic Indicators> or <FSC-STD-30-010r FSC Regulatory Module – Controlled Forest Management>, and this standard addendum. [Clause 1.4 FSC-STD-30-005] [■ □]

2 GROUP RULES

- 2.1 The group rules shall include how the group addresses all applicable requirements of the FSC Regulatory Module. [Clause 9.1 FSC-STD-30-005] [■ □]

3 DIVISION OF RESPONSIBILITIES

- 3.1 The group entity may divide the responsibilities resulting from the implementation of this standard addendum among the different actors in the group (e.g., group entity, group members, forestry contractors, etc.), including the responsibility of implementing the due diligence. [Clause 3.1 FSC-STD-30-005] [■ □]

4 INTERNAL MONITORING SYSTEM

- 4.1 The internal monitoring system shall include an evaluation of the continued conformity of all group members with the applicable requirements of the FSC Regulatory Module. [Clause 11.1 a) FSC-STD-30-005] [■ □]



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