



FREQUENTLY ASKED QUESTIONS

# FAQS ON THE CURRENT SITUATION IN RUSSIA, BELARUS AND UKRAINE

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**Title:** FAQs on the Current Situation in Russia, Belarus and Ukraine

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# FREQUENTLY ASKED QUESTIONS (FAQS)

This document provides answers to frequently asked questions (FAQs) on the FSC decisions and the normative changes introduced as a response to the invasion of the Russian military into Ukraine published first on 8 March 2022. Answers provided in this document are of informative nature and shall not be considered normative.

## 1 FSC DECISIONS

### 1.1 What is the overall decision of FSC regarding the status of certificates and forest products from Russia and Belarus?

FSC decided in alignment with Assurance Services International (ASI) that all certificates which allow the sale or promotion of FSC certified products in Russia and Belarus will have to be suspended and to block all sourcing of non-certified forest product from the two countries. This means that once this suspension and blockage becomes effective, wood and other forest products can no longer be sourced as FSC certified or controlled from Russia and Belarus for their inclusion in FSC products anywhere in the world.

### 1.2 What is the rationale for this overall decision by FSC?

From 24 February 2022, the risk situation of sourcing from Russia and Belarus has abruptly changed due to the Russian government's declaration of a 'special military operation' in Ukraine and complicit activities by Belarus resulting in the violent invasion by the Russian military. This situation represents a particular threat to the integrity of sourcing timber and other forest-based material from these countries according to the FSC Controlled Wood normative framework: as all forest in these countries is owned by the state, it was concluded that there is a material risk for the overall forest sector in these countries through the revenues it creates for the states to be associated with this violent armed conflict that threatens national and regional security and is linked to military control.

### 1.3 What is the additional decision that FSC has taken on Belarus?

For Belarus, in addition to the risks identified in relation to the Russian intervention in Ukraine, both ASI as well as FSC have identified uncontrollable risks related to upholding and assessing certain FSC social requirements which are based on ILO core conventions. ASI has therefore decided to terminate its FSC oversight activities in Belarus as of 14 March 2022. As a consequence, FSC certificates will not only have to be suspended as governed by the overall decision of FSC for Russia and Belarus, but will have to be withdrawn by certification bodies.

### 1.4 What is the effective date of FSC's decisions on Russia and Belarus?

The effective date by when certificates will have to be suspended in Russia and withdrawn in Belarus is 8 April 2022. This follows from a 30-day timeline which applies also for companies sourcing non-certified material as controlled from these countries, after which these companies will have to have adapted their due diligence system and stopped any such sourcing. The effective date for these certificate suspensions and withdrawals is independent from the suspension and termination dates issued by ASI for certification bodies themselves which take effect before FSC's decisions. Certification bodies will remain in charge for relevant actions towards their certificate holders beyond their own suspension or termination date (see Q5.1) but may decide to suspend or withdraw certificates at the same time or before 8 April 2022.

## 1.5 Why are relevant certificates not suspended or withdrawn immediately?

The timeline was carefully chosen, considering both the urgency of action, the ability to implement suspensions as well as the impact on certificate holders. A 30-day timeline has been set to:

- a. Ensure that all directly affected parties and their staff are duly informed and can take the steps necessary to change internal systems and inform their clients and customers accordingly;
- b. Allow for an orderly closing down of relevant certification, trading and sourcing activities by our business partners around the world with respect to Russia and Belarus; and
- c. Avoid the risk of false claims and non-conforming products which would arise from overly short implementation timelines and require a series of follow-up actions by sourcing companies, certification bodies, ASI, and FSC alike.

## 1.6 Will FSC charge an Annual Administration Fee for the suspended certificates in Russia as is the case for suspended certificates in general?

FSC will not charge an Annual Administration Fee (AAF) for these suspended certificates during the time of suspension. Certification bodies are advised not to invoice the AAF to their clients for the duration of the suspension via a corresponding advice note (FSC-ADV-20-005-01).

## 1.7 (AMENDED) What measures has FSC introduced to address the situation in Ukraine?

FSC has assessed the risk of illegality and conflict timber within the zone of armed conflict in Ukraine and concluded certificates must be suspended and cease sourcing controlled wood within these zones by 4 May 2022. The revised National Risk Assessment for Ukraine provides list of sources to be used in the identification of conflict zones.

Outside of conflict zones the certificates can be maintained as long as all applicable requirements are met. In recognition of travel restrictions related to the ongoing armed conflict, FSC has issued a set of derogations to facilitate auditing of remaining certificates in Ukraine.

If a new conflict zone is identified, certification bodies have to inform the certificate holders located within the conflict zone about their upcoming suspension within three (3) business days after identifying the new conflict zone, and certificate holders sourcing from Ukraine but located outside of the zone within five (5) business days. A given area continues to be considered as a conflict zone even after the military activities cease to take place.

FSC will monitor the situation in Ukraine and might decide to exclude supplies from this country accordingly.

## 2 OPTIONS AND OBLIGATIONS FOR SUSPENDED OR WITHDRAWN CERTIFICATE HOLDERS IN RUSSIA, UKRAINE AND BELARUS

### 2.1 Can suspended certificate holders still produce material from their input stock which would be considered certified once the suspension would be lifted?

This is possible, provided that the organization can demonstrate to the certification body that the materials have continued to be subject to the organization's chain of custody system and provided that any otherwise due surveillance or re-certification evaluations are conducted (see Q5.3).

### 2.2 Could suspended certificate holders still purchase eligible material and add this to the input stock of corresponding FSC product groups?

No, suspended certificate holders cannot add newly sourced material to their FSC product groups.



### **2.3 (AMENDED) Will product held on stock maintain or regain its eligible status once that the suspension is lifted?**

Yes, both input and output material held on stock during the suspension regains its status as certified, controlled or reclaimed upon the reinstatement of certification upon providing evidence that throughout the suspension period the material status has been kept identifiable and the material has not undergone any modification.

### **2.4 (AMENDED) How are the timelines for the expiry of FSC credits or for the calculation of FSC percentages affected by the suspension of certificates?**

Relevant timelines can be put on 'pause'— i.e., the time passed during the suspension is not considered for relevant calculations. Once the suspension is lifted, the calculation of relevant timelines can continue.

### **2.5 Can suspended certificate holders still label material?**

No, during their suspension organizations can no longer use and newly apply the FSC trademarks.

### **2.6 Can suspended certificate holders still sell material with FSC claims that was produced and labelled before the suspension date, but held on stock for delivery?**

No, during their suspension organizations will no longer be eligible to sell products with FSC claims as their trademark license will be suspended as a consequence of the suspended certification.

### **2.7 (AMENDED) Could suspended or withdrawn certificate holders still deliver material that was produced and sold (invoiced) before the suspension date, but still held on stock?**

Products that have been invoiced and thereby placed on the market before the suspension date can be delivered accordingly (see also Q3.2).

### **2.8 (AMENDED) Can material which has been produced and labelled but not sold (invoiced) before the suspension or withdrawal date still be delivered with the relevant FSC labels after the suspension date?**

Use and distribution of the FSC trademarks, whether in the form of promotional items, invoice claims, or product labels, is generally not allowed for suspended or withdrawn certificate holders due to likewise suspended or terminated trademark licenses. Relevant labels therefore would have to be removed or covered prior to its distribution.

To cover for the extraordinary situations where relevant label removals or coverings would be unfeasible and create unbearable consequences, e.g. resulting in disproportionate and excessive costs or requiring the destruction of relevant material or packaging with unjustifiable environmental impacts, FSC has issued a generic derogation ([FSC-DER-2022-009](#)) to allow for products which have been produced and labelled but not sold (invoiced) before the applicable suspension dates to be delivered with the relevant FSC labels if the organization can demonstrate unbearable consequences of unlabeled or not delivering corresponding product.

For Belarussian certificate holders who can no longer obtain necessary evaluation of potential unbearable consequences from their certification bodies, FSC allows organizations in Belarus to apply for a derogation directly to PSU by submitting the corresponding request according to PSU-PRO-10-201 via email to [psu.cis@fsc.org](mailto:psu.cis@fsc.org) with the subject line "Derogation request Belarus [Former FSC License Code]". FSC might revise this approach as necessary based on the requests received.



## **2.9 (AMENDED) Do suspended certificate holders in Russia or Ukraine need to update their due diligence systems (DDS) for their chain of custody certificates with controlled wood in the scope?**

If the suspended certificate holder located in Russia or Ukraine decides to continuously maintain and verify its due diligence system (DDS) during the suspension when possible to enable faster re-instatement of the certificate, adapting the DDS to the revised FSC risk assessments for Russia, Belarus, and Ukraine is expected within the timelines stipulated in FSC-ADV-40-005-25 and INT-ADV-40-005-25-01.

In other cases, suspended certificate holders in Russia and Ukraine are not required to adapt their DDS's to the revised FSC risk assessments in Russia, Belarus, and Ukraine during the suspension of their certificates. However, in order to lift the suspension, a corresponding evaluation of conformance with FSC-STD-40-005 will need to take place.

## **3 IMPLICATIONS FOR CERTIFICATE HOLDERS BASED OUTSIDE, SOURCING FROM, OR OUTSOURCING ACTIVITIES TO RUSSIA, BELARUS, OR UKRAINE**

### **3.1 (AMENDED) Can certified or controlled material purchased from Russia, Belarus, or conflict zones in Ukraine before the applicable suspension or withdrawal dates still maintain its status beyond that date?**

Yes, insofar as the material has been dispatched by relevant certificate holders or non-certified suppliers by that time (but not necessarily received by sourcing companies outside of the two countries). In the case of material from suspended certificate holders in Russia, material dispatched only after the suspension date can retain its certification status based on a corresponding verification by the certification body (see Q3.2).

### **3.2 (AMENDED) Can material produced and purchased from Russia, Belarus, or conflict zones in Ukraine before the applicable suspension or withdrawal date, but only shipped (dispatched) after that date be used as certified?**

In general, products which have not yet left the organization's chain of custody system at the time the certificate is invalidated have lost their certified status.

**RUSSIA:** However, to account for the extraordinary circumstances of this suspension, FSC will allow the use of relevant products as certified if the certification body has verified whether the relevant stock existed and the invoice was issued prior to the suspension date. FSC has regulated the details of this exception via a new advice note for certification bodies ([FSC-ADV-20-011-14](#)) and a generic derogation ([FSC-DER-2022-002](#)) for certificate holders purchasing from Russia.

**BELARUS:** The above outlined exception cannot be applied to Belarus as certification bodies are no longer accredited to operate in the country.

**UKRAINE:** Since the suspension is required due to the ongoing armed conflict in given areas, there is no credible option for ensuring material conformance with applicable FSC requirements. Hence general rules must apply, and material cannot be used as certified.

### **3.3 Would material which has been produced and labelled but not sold (invoiced) before the suspension date be considered non-conforming product when claimed as certified or distributed with FSC labels and the distributing organization to have made a 'false claim'?**

Yes, relevant material has to be considered non-conforming product by receiving organizations. Further, the distributing organization would have made a false claim unless such distribution would be covered by

a derogation as outlined under Q2.8. The false claim could be classified as 'Other False Claim' depending on the circumstances.

### **3.4 (AMENDED) Can reclaimed material continue to be sourced from Russia, Belarus, or conflict zones in Ukraine?**

No, reclaimed material sourced from mentioned areas is no longer eligible input for FSC product groups and must be excluded from certified organizations' validation process.

### **3.5 (AMENDED) Are multi-site participants and group members in Russia, Belarus or conflict zones in Ukraine which are under multi-site and group certificates issued to organizations based outside of these countries impacted?**

Yes. According to FSC-ADV-20-001-12, certification bodies have to reduce the scope of relevant group and multi-site certificates to ensure that group members and multi-site participants which are based within the geographical scope of FSC Risk Assessments with relevant risk designations are excluded from such certificates.

### **3.6 (AMENDED) Can FSC certificate holders continue to outsource activities to organizations located in Russia, Belarus, or conflict zones in Ukraine?**

No, contractors form part of the overall forest product sector and therefore must be excluded from providing outsourced services to FSC certificate holders.

## **4 QUESTIONS RELATED TO FOREST MANAGEMENT CERTIFICATION**

### **4.1 What is the benefit and implication for certificate holders in Russia to hold FM certification?**

FSC has provided the possibility for maintaining FM certification in the interest of responsible forest management. The potential benefit of this certification for a certificate holder is the ability to demonstrate that their forest continues to be responsibly managed. As FM certificates do not have CoC in their scope, relevant certification requirements will not have to be audited by certification bodies – in return, FM certificate holders are not eligible to sell or promote their products as FSC certified nor would any newly harvested material later gain the status as certified when the scope would be extended again to FM/CoC certification. Only material harvested prior to and held at stock at the time of the certification scope change to FM regains its status as certified once certification would revert back to FM/CoC. However, there are no restrictions for an FM certificate compared to an FM/CoC certificate towards conducting harvesting activities, and these activities will be continued to be audited according to the applicable certification requirements.

### **4.2 Why are forest management (FM) certificates exempt from suspensions in Russia?**

The decision to have all certificates which allow the sale or promotion of FSC certified products in Russia suspended and to block all sourcing of non-certified forest product (see Q1.1) was based on the concluded existing uncontrollable risk of the overall forest sector to be associated with the violent armed conflict caused by the Russian military through the revenues it creates for the state (see Q1.2). The relevant FSC Controlled Wood indicator refers, amongst other aspects, to the concept of 'conflict timber' which again explicitly refers to "revenues from the timber trade" and "timber that has been traded at some point in the chain of custody."

Hence, FM certificates that do not have CoC in their scope and thus are not eligible to sell or promote FSC certified products are not subject to the same risk of such an association as FM/CoC certificates. FSC

further considers it paramount to enable the continued demonstration of responsible forest management by maintaining FM certificates.

#### **4.3 Which criteria or indicators of the National Forest Stewardship Standard are not applicable for FM certification in Russia?**

Criterion 8.5 is related to the potential CoC scope as part of an FM/CoC certificate and would not be applicable for FM certification. Other criteria or indicators may no longer be applicable due to the specific situation of the relevant forest management unit, which will be determined on a case-by-case basis by the certification body according to the scope of certification of the organization.

#### **4.4 (AMENDED) Can timber or NTFPs harvested and stored by FM/CoC certificate holders under suspension be sold with an FSC Claim once the suspension is lifted?**

No, timber or NTFPs harvested and stored under suspension cannot be sold with an FSC claim once the suspension is lifted. Only material harvested prior to and held at stock at the time of the suspension regains its status as certified once certification is reinstated, as long as all applicable requirements are met.

## **5 CLARIFICATIONS AND IMPLICATIONS FOR CERTIFICATION BODIES**

### **5.1 (AMENDED) What are the overall responsibilities of CBs with respect to FSC's decision?**

Certification bodies (CBs) will have to take the relevant measures to effectuate the required suspensions and withdrawals of certificates in Russia, Ukraine and Belarus, respectively, irrespective of the actions taken by ASI affecting their scope to operate in these countries. This responsibility involves the following activities:

- a. informing their clients within the timelines stipulated in FSC-ADV-20-001-12 and associated interpretations;
- b. the subsequent suspension of relevant certificates in Russia (by 8 April 2022, see also Q5.11)) and Ukraine (by 4 May 2022); and the termination of all certificates in Belarus (by 8 April 2022) based on relevant forest sector wide risks that cannot be mitigated, controlled, or audited;
- c. the relevant registration of these certificate changes in the FSC certificate database;
- d. conducting verification audits requested by certificate holders in Russia for stock sold but not dispatched by the time of the suspension and the issuance of relevant confirmation statements (see Q3.2); and
- e. any relevant scope reductions requested by FM/CoC certificate holders in Russia with the relevant surveillance activities.

### **5.2 What are the restrictions for certification bodies operating in Russia?**

ASI has suspended the geographical scope of "Russia" for all certification bodies (CBs), which was effective as of 15 March 2022. This means that CBs will neither be eligible to issue any new certificates nor to add new sites or group members to the existing certificates or issue any scope extensions. CBs may further reduce the scope of their certificate holders (see Q5.12).

### **5.3 (AMENDED) May surveillance and re-certification evaluations continue to be conducted in Russia or Ukraine while certificates are suspended? If so, what is the benefit thereof and the alternative?**

RUSSIA: Yes, surveillance and re-certification evaluations of suspended Russian certificates may continue to be conducted in accordance with applicable FSC requirements as the reason for suspension is unrelated to the organizations' performance and relevant management systems.

The benefit of continuing surveillance evaluations is that the organization can continue to produce output stock from their inputs existing at the time the suspension started. Chain of custody organizations can further thereby switch to the new version of FSC-STD-40-004 including the FSC core labour requirements. Finally, the organization will then not be required to undergo the missed surveillance evaluation prior to lifting the suspension.

The organization may, however, decide to skip their otherwise due surveillance evaluation in which case it cannot produce any material which will regain certified or controlled status upon lifting the suspension. Also, the organization is likely to encounter quite some delays to obtain the required missed evaluation, due to capacity constraints of its certification body.

The implication of not undergoing a re-certification evaluation is that the certificate will expire, at the latest after a possible six (6) month extension which can be granted by the certification body (see Q5.5).

UKRAINE: Since the suspension is required due to the armed conflict ongoing in given areas, there is no credible option for ensuring the safety and quality of the evaluation. Hence, the evaluation activities should not continue.

This means that the organizations cannot produce any material which will regain certified or controlled status upon lifting the suspension. The implication of not undergoing a re-certification evaluation would normally be that the certificate will expire, latest after a possible six (6) month extension which can be granted by the certification body (see Q5.5). Considering exceptional circumstances, FSC will closely monitor the situation in Ukraine and be ready to issue additional measures supporting the reinstatement of the certification, subject to an evaluation of associated risks.

#### **5.4 (AMENDED) What happens when suspended certificates in Russia or Ukraine pass the deadline for their annual surveillance audit or for the re-certification?**

When a suspended certificate passes the deadline for the annual surveillance evaluation, the certificate remains suspended until the maximum suspension timeline (see FSC-STD-20-001 V4-0 Clause 4.7.5) by which the certificate shall be withdrawn, or until suspension is lifted, whatever happens earlier (see Q5.10).

When a suspended certificate passes the deadline for re-certification, the certificate expires at the expiry date (see Q5.3).

#### **5.5 Are CBs allowed to extend the validity of certification for suspended certificates before their validity expires?**

Yes, CBs may grant a single exceptional extension of up to six (6) months according to clause 1.4.4 of FSC-STD-20-001.

#### **5.6 (AMENDED) Is it possible to evaluate the transition to a revised FSC normative document while the certificate is suspended?**

RUSSIA: Yes, the evaluation of conformity against a revised FSC normative document may be conducted in Russia while the certificate is suspended and, in this case, shall be completed by the end of the transition period. If the organization decides not to undergo any surveillance evaluations during their suspension and the overall suspension would extend beyond the end of the transition period, then the organization needs to demonstrate conformance with the revised FSC normative document before its suspension could be lifted.

UKRAINE: If the evaluations lifting the suspension extends beyond the end of the transition period, then the organization needs to demonstrate conformance with the revised FSC normative document before its suspension could be lifted.

## **5.7 Can certification bodies recertify organizations with 'FM certificates' in Russia for a new 5-year period?**

Yes, re-certifications are possible for forest management (FM) certificates.

## **5.8 (AMENDED) What is expected from certification bodies when a certificate holder under its evaluation that is sourcing material from Russia, Belarus, or conflict zones in Ukraine does not adapt its due diligence system to exclude material from both countries prior to the required date?**

In such cases the certification body shall issue a major non-conformity with appropriate timelines for correction. Using relevant material before the major non-conformity is corrected will be considered as deliberate generation of false claims.

## **5.9 (AMENDED) When and how could the suspension of certificates in Russia and Ukraine be lifted?**

Certificates can only be reinstated when the 'specified risk' designation for the National Risk Assessment (NRA) of Russian Federation and Ukraine revised as per FSC-ADV-60-002-01 are reverted. FSC may stipulate additional measures necessary before suspensions can be lifted, depending on the overall developments and risk situation in Russia both for responsible forest management and credible product trading.

## **5.10 When would certificates need to be withdrawn if the conflict persists?**

Certificates generally may remain suspended for a maximum period of 12 months. FSC will clarify before the end of this period if exceptional circumstances may be claimed to allow for a longer period of overall 18 months. After this period suspended certificates will have to be withdrawn by the certification body.

## **5.11 Are there any exceptions regarding the suspension or withdrawal of certificates?**

As pointed out under Q1.1, the suspension in Russia affects only the certificates that allow the sale or promotion of FSC products – the corresponding certificate types have one of the following certification code components: 'FM/CoC', 'CW/FM', or 'CoC'. Forest management certificates, with the code component 'FM', are exempted from the suspension decision as they are not eligible to sell any forest products with the FSC claim, which is the only exception (see also Q4.2).

## **5.12 (AMENDED) Could FM/CoC certificates be changed to FM certificates instead?**

RUSSIA: Yes, certification bodies (CBs) can reduce the certificate scope from FM/CoC to FM certificates either before the suspension would become effective or during the suspension, after which the suspension can be lifted. CBs will be able to evaluate these certificates and Assurance Services International (ASI) will remotely oversee CB activities for additional assurance.

The FM-certified organizations are allowed to promote their FM certificate as long as the certificate is valid, and all requirements for the use of FSC trademarks and promotion are met.

UKRAINE: Since the suspension is required due to the armed conflict ongoing in given areas, there is no credible option for ensuring conformance with the national forest stewardship standard. Hence, there is no possibility to reduce the scope of FM/CoC certificates and maintain FM certificates instead.

## **5.13 How should the change of the scope from FM/CoC certificates to FM certificates in Russia be technically done in the FSC database?**

FSC will support changes to the scope of the FM/CoC to FM certificates. If a certificate holder holding an FM/CoC certificate is not interested in a scope reduction to FM, the CB shall suspend the certificate in the

FSC database. If a certificate holder holding an FM/CoC certificate is interested in the scope reduction to FM, the CB shall leave the current FM/CoC certificate valid as of 8 April 2022. On this date, FSC will consider all valid FM/CoC as interested in scope reduction to FM and will change them directly without further CB intervention.

If a suspended FM/CoC certificate holder becomes interested in the scope reduction during their suspension, the CB should contact FSC's database team via email at [database@fsc.org](mailto:database@fsc.org) and request the scope change.

#### **5.14 Is it possible for certification bodies to issue new forest management certificates in Russia?**

As of 15 March 2022, the geographic scope of certification bodies was suspended by ASI for Russia with the effect that new certificates can no longer be issued which also applies to FM certificates (see Q5.2). Certification bodies can only maintain existing certificates as far as this is allowed (only FM certificates can be kept valid beyond 8 April 2022 – see Q4.2). The only option for an FM certificate to be issued is the issuance of such certificates before the suspension becomes effective or to reduce the scope of existing FM/CoC certificates accordingly (see Q5.12).



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