Q&A FSC CORE LABOUR REQUIREMENTS: TECHNICAL WEBINAR SELF-ASSESSMENT

Q&A for 24 August 2021

Self-assessment

1. Does self-assessment need to be signed by CoC Manager or for example by Plant Manager due to the specific kind of requirements?

The management representative who has overall responsibility and authority for the organization's conformity to all FSC certification requirements should sign the self-assessment.

2. When do we have to submit the self-assessment? Before the annual surveillance audit?

The self-assessment needs to be sent to the certification body before the annual surveillance audit (i.e., before they are on-site). This is to enable the certification body to better plan the audit. If they are sent only just before the audit, the auditors would then probably need to spend more time evaluating every aspect on-site. Sending the self-assessment in advance can support them to determine which are the critical control points that they need to check on-site and which they can evaluate based on documents remotely.

3. Do the self-assessments need to be completed in English as well as a local language?

Self-assessments may be undertaken in the local language or English. We do not prescribe the languages required to complete the templates.

4. Do we need to provide the self-assessment to our FSC customers?

No, the self-assessments shall only be provided to your certification body, see the application requirement from FSC-STD-40-004 below:

1.6 The organization shall maintain an up-to-date self-assessment in which it describes how the organization applies the FSC core labour requirements to its operations. The self-assessment shall be submitted to the organization's certification body.

5. Can the FSC self-assessment template be used in the risk assessment or can the risk assessment be done in your way?

Yes, you can use the self-assessment in your way, the FSC self-assessment template is only meant to act as guidance.

6. Does self-assessment apply to contractors and outsourcers?

Yes, self-assessment applies to all parts of the organization, including contractors. You must demonstrate that you have performed your due diligence to check your contractor's conformity to the core labour requirements. Activities that are contracted out to outsourcers and (sub)contractors are under the scope of the organization's CoC certificate and included in the evaluation by certification bodies. For more information, please refer to the FSC Core Labour Requirements Q&A.

7. How to check if the self-assessment results are reflected at the contractor level when CB does not have to audit low-risk contractors?

The standard provides the flexibility for certification bodies to decide the extent of verification that they require. depending on the information provided within the self-assessment, the certification body can decide whether they need to do an onsite evaluation of the contractors (e.g., if the risk is low and the evidence provided in the self-assessment is satisfactory) to prove that the organization is meeting the FSC requirements, then an onsite evaluation for the FSC core labour requirements may not be required.

8. Does the outsourced contractor need to complete the self-assessment?

No, the outsourced contractor does not need to complete the self-assessment. The organization that is certified is responsible for complete the self-assessment. As required, they would be required to complete the self-assessment to include their contractors. For more information, please refer to the FSC Core Labour Requirements Q&A.

9. Where can we find the template of the self-assessment?

The template can be found within Annex D of Version 3-1 of the Chain of Custody Certification Standard. You can find fillable versions on the chain of custody page on the FSC International website.

10. Does the self-assessment need to be sent every year to the certification body before the audit or only once?

The self-assessment needs to be sent to the certification body before every audit.

11. In addition to the self-assessment, do we need to draft our procedures accordingly for the fulfilment of the requirements?

No, there is no requirement for you to re-draft any procedure, however, you do need to fulfil all the requirements of the standard.

12. Where can I download the self-assessment template?

The self-assessment template and the Q&A asked questions can be found at this location on the FSC website at the bottom of the page: https://fsc.org/en/chain-of-custody-certification. All relevant links and guidance material that are already available or would be made available in future would be made available at that location.

13. What happens if the company answers 'No' to question a*) Does your organization comply with Clause X.X?* **Does the company still conform without nonconformities if they have an appropriate action plan for conformity? Or is it considered a major nonconformity?**

The certificate will be issued only if all the requirements are met or for surveillance audits, and a nonconformity would be issued if the organization does not conform. The nonconformity would be considered resolved once the issue is addressed. Classification of nonconformities are based on the severity of the nonconformity and whether is it systemic.

14. If we apply the transfer system and trading only, do we need to send the self-assessment to our supplier?

No, there is no need to send the question to your supplier. The standard is only looking at your conformance to the requirements, not your supplier. As a trader, you still need to complete the self-assessment, but for many requirements, some of the clauses might not be applicable but that would depend on your situation.

FSC Policy Statement(s)

15. Is it sufficient if we let our shareholders and/or stakeholders know that the policy statement is available on request?

Yes, conformance to Clause 1.5 means making the policy available to affected and interested stakeholders and the certification body.

16. If the policy statement is available for stakeholders on request, is this sufficient for conformity with clause 1.5?

Yes, conformance to Clause 1.5 means making the policy available to affected and interested stakeholders and to the certification body.

17. Is it necessary to make the policy statement publicly available?

No, the policy statement does not need to be publicly available however it needs to be made available to stakeholders and the certification body. See the relevant requirement below:

1.5   The organization shall adopt1 and implement a policy statement, or statements, that encompass the FSC core labour requirements. The policy statements shall be made available to stakeholders (i.e. affected and interested stakeholders) and to the organization's certification body.

18. What if we don´t have a police statement on the FSC core labour requirements on our homepage or anywhere else is this acceptable?

The policy statements are a requirement of the standard however it does not specify that it must be on the website, just that it is publicly available. Your certification body would be determined if the requirements are not met, it would result in a non-conformity. Please see the relevant requirement below:

1.5   The organization shall adopt and implement a policy statement, or statements, that encompass the FSC core labour requirements. The policy statements shall be made available to stakeholders (i.e. affected and interested stakeholders) and to the organization's certification body.

19. If the policy statement(s) are written in procedures, should the internal procedures be made available to all stakeholders?

No, the requirement is only for the policy statement(s) to be made available to the stakeholders, not the procedures. See the applicable requirement below:

1.6   The organization shall adopt1 and implement a policy statement, or statements, that encompass the FSC core labour requirements. The policy statements shall be made available to stakeholders (i.e., affected and interested stakeholders) and to the organization's certification body.

National law and ILO conventions

20. If our country has ratified the ILO Eight Fundamental Conventions which cover the FSC core labour requirements, do we still have to follow the requirements?

The location of your company does not change the need to meet these requirements. Even if your country has ratified the ILO Eight Fundamental Conventions, you still need to demonstrate in your self-assessment how organizations conform with those requirements.

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[1]   May develop a new policy or use an existing one.

Forced or compulsory labour

21. Is it considered a major nonconformance if the organization holds or keeps a foreign worker's passport?

Regarding keeping foreign worker's passports, please refer to the 'Forced or compulsory labour's section of the FSC Core Labour Requirements Q&A.

22. Can we use the voluntary work by prisoners under our national laws?

Regarding the use of prison labour, please refer to the 'Forced or compulsory labour' section of the FSC Core Labour Requirements Q&A.

Discrimination in employment and occupation

23. If we don't have a recruitment policy, but instead a recruitment procedure, can the procedure replace the policy statement?

Yes, the recruitment procedure may replace policy, if it covers the requirements. There is a lot of flexibility to the requirements, we would encourage you to look at your existing policies and procedures and incorporate them as much as possible into the self-assessment.

Freedom of association and right to collective bargaining

24. Is OK if there is no trade union membership for all staff?

It is possible that trade unions are not active with the organization but that should not be because the organization actively preventing any workers and trade union from developing or organizing. The organization needs to respect the freedom of association of the workers that does not mean that workers must be part of a trade union if that is their choice. See the relevant clause below:

7.5.3 The organization respects the rights of workers to engage in lawful activities related to forming, joining, or assisting a workers' organization, or to refrain from doing the same, and will not discriminate or punish workers for exercising these rights.

Audit and surveillance evaluations

25. Should we expect the audit time for all clients (certificate holders) to increase to cover the additional requirements, is there any guidance on this?

Yes, there would be some increase in audit times for certificate holders. The actual extent would depend on the level of detail provided in the self-assessment. Also, we are looking at benchmarking other social compliance assessment schemes. Once this is complete, if an

organization is certified against those benchmarked schemes, they would not need to be evaluated again against FSC requirements.

26. Does the self-assessment need to be sent to the certification body before every audit regardless of any changes?

Yes, the self-assessment needs to be sent to the certification body before. If there are not, changes you can inform your certification body that there is no change since the last audit.

27. Could the self-assessment affect the audit duration?

There might be some effect on audit duration. The provision for the self-assessment is designed to reduce that time as much as possible. The more detailed, factual and evidence led the self-assessment is, the less time auditors need to spend on-site verification and conformance to FSC core labour Requirements.

28. In case of the initial evaluation or re-evaluation is version 3-0 of the standard still apply after 01 September 2021?

Yes, it is possible to be audited as per V3-0 until December 2022. However, all certificates which are audited against V3-0 and have not transitioned to the new version by the end of December 2022, shall lose their certificate by the latest June 2023.

29. It is up to the discretion of the certification body whether to start requesting the self-assessment from 01 September 2021?

No, it depends on which version of the standard you are being audited against. If you are going to be audited against V3-1, then the self-assessment should be available to the certification body. You have the option of continuing your next surveillance audit against V3-0 this year and migrate to the new version by next year.

30. When will the self-assessment be included in audits (surveillance and re-certification evaluation) from the 1st September 2021?

The new version of the standard becomes effective from 01 September 2021, but it is still in a transition period till the end of December 2022. During this transition period, both versions of the standard continue to remain active. The self-assessment shall be submitted to the certification before the audit. For more information, please refer to the 'FSC core labour requirements self-assessment' section of the FSC Core Labour Requirements Q&A.

31. What if the Company gets a visit of ASI and only has the self-assessment is in the local language? In the case the ASI auditor is not a native speaker, how will they be able to assess the self-assessment properly?

The self-assessment is something the company provides, detailing the way it complies with the FSC Core Labour Requirements. It can be in the local language. The CB auditors are expected to be competent in the local language, since the local language can also be used for audits and for reports.

As far as ASI is concerned, they are assessing the CB for conformance to the auditing requirements. In most cases, when the ASI auditor is not a native speaker of the language of the audit, they may arrange for local interpreters/translators.

Recognition of other schemes

32. Can the SEDEX annual audit which is conducted by a third party replace the self-assessment?

No, as of now, the self-assessment will still need to be completed by the organization. However, the evidence used for the SEDEX annual audit may be used in the self-assessment. We are currently evaluating other schemes to see if we can benchmark FSC requirements with them. For more information, please refer to the 'Recognition of other schemes' section within the FSC Core Labour Requirements Q&A.

33. Can we use our SEDEX certification as evidence in self-assessment?

Evidence used in SEDEX audits can be included within the self-assessment. A valid SEDEX certificate does not replace the self-assessment. We are currently evaluating other schemes to see if we can benchmark FSC requirements with them. For more information, please refer to the 'Recognition of other schemes' section within the FSC Core Labour Requirements Q&A.

34. Should we be certified against a labour or social certification scheme such as SEDEX to be eligible to be certified with the new Chain of Custody Certification Standard?

No, you do not need to get certified to any other labour or social certification scheme to be certified against the FSC Chain of Custody Certification standard, the standard is standalone. We are currently evaluating other schemes to see if we can benchmark FSC requirements with them. For more information, please refer to the 'Recognition of other schemes' section within the FSC Core Labour Requirements Q&A.

35. Does the national self-assessment template refer to China Forest Certification Council (CFCC) in China?

No, the self-assessment template, in general, does not presently refer to the CFCC or any other country-specific scheme.

Outsourcing and contractors

36. Do we need to check if our subcontractors are FSC Certified?

No, subcontractors do not need to be FSC certified. If your subcontractor is FSC certified, then they would already be audited against the FSC core labour requirements, so then you need not include them in your self-assessment. For more information, please refer to the 'FSC core labour requirements self-assessment 'section of the [FSC Core Labour Requirements Q&A](#).

37. How do the organization assess their contractor to demonstrate the contractor is complying also?

The organization needs to check the compliance of the contractor against the FSC core labour requirements mentioned in Section 7 of the FSC-STD-40-004 V3-1. You must demonstrate that you have performed your due diligence to check your contractor's conformity to the core labour requirements. For more information, please refer to the [FSC Core Labour Requirements Q&A](#)

38. What if the FSC certified subcontractors are still certified against FSC-STD-40-004 V3-0, does the company then need to include the sub-contractors (within the first year)?

Yes, if the subcontractors are not certified under FSC for the core labour requirements, then the certificate holder would need to include them within the self-assessment labour requirements if you are getting yourselves audited against V3-1 and your contractor is certified against V3-0.

39. If the outsourcer is not required to complete the self-assessment, does the certified company need to audit the outsourcer regarding FSC core labour requirements?

Not necessarily an audit, but yes, the FSC certified company needs to ensure that their outsourcer is meeting the FSC core labour requirements. The outsourced entity does not need to do complete the self-assessment, but the FSC certified company still needs to include outsourcer in their self-assessment. Ultimately, the certificate is issued to the FSC certified company on the understanding that the company is meeting all the FSC requirements (irrespective of whether it is doing all the production on its own, or if it is outsourcing some work to contractors).

Miscellaneous

40. Will we receive an e-mail once the webinar becomes available on the FSC website?
No, we may not be able to send emails notification but sign up for our newsletter to receive a notification. https://fsc.org/en/chain-of-custody-certification

41. Is it compulsory for certification to complete the FSC e-training course?
No, the FSC e-training course on the website is not compulsory.

42. Is there a fee to access the e-training course or is it for free?
There is a fee related to the e-training course. FSC's e-training platform gives you access to a variety of online courses related to FSC's work. You can access the e-training course here: https://etraining.fsc.org

Q&A from 26 August 2021

Self-assessment

1. What is the time frame to send the self-assessment to the auditor?
Self-assessments need to be sent prior to the audit, in time for the auditor to plan the audit.

2. Does an SA8000 certification replace a self-assessment?
No, SA 8000 does not replace a self-assessment. However, the evidence used for SA8000 could be used to complete the self-assessment. We are currently working on procedures to benchmark other social conformance/certification schemes which address the same issues as the FSC core labour Requirements.

3. Is it prescribed who needs to complete self-assessment on behalf of an organization (i.e., CEO, the person responsible for certification, etc.)?
The self-assessment templates are currently available on the FSC website, COC webpage (please scroll to the bottom). The organization needs to complete the self-assessment - it is not specified who needs to complete it but the management representative who has overall responsibility and authority for the organization's conformity to all FSC certification requirements should sign the self-assessment. The self-assessment needs to be completed and sent to the auditor prior to the audit. Ideally, the self-assessment should be sent in advance (at least a few weeks, along with the other documents) so that the auditors can use it to plan the audit. the more detailed the self-assessment, the less time the auditor needs to spend verifying the requirements.

4. Is it possible to send a link to the self-assessment template?
Please refer to this website: https://fsc.org/en/chain-of-custody-certification#documents

5. Do we list sites/locations that are not part of the certification?
No, the self-assessment is only applicable to the scope of the certificate, only sites/locations which are part of the FSC CoC certificate.

6. Is the self-assessment for the whole supply chain or the FSC supply chain?
Self-assessment is only for the FSC supply chain.

7. Should this be this policy and self-assessment applied to our suppliers?
No, the self-assessment is only for your operations, and do not extend to your suppliers.

8. If we have different sites in Germany or somewhere else, is it necessary to complete the self-assessment for every site or on a country level?
You can complete the self-assessment at the organizational, country or site level. The choice is yours, ultimately it is a question of complexity and the ability to verify and check that. It may be easier to maintain the self-assessment for individual sites, but in case the requirements and context is uniform, there is no harm in maintaining it at a country level.

9. All the information presented should be in the self-assessment statement.
Yes, the prompting questions are available as part of the self-assessment template. We are also developing along with our network partners, self-assessment templates specifically for certain countries. Yes, all this information is required as part of the self-assessment.

10. Are the self-assessment templates specific to certain countries? Do you have a timeline for when this would be available? Has the self-assessment for Canada been developed?
We hope to put out the country-specific self-assessments in the next couple of months.

11. Would a self-assessment fully based on a third-party survey of all employees be considered compliant?
A survey would not replace the self-assessment - the self-assessment needs to show how the organization is complying with the requirements and evidence for compliance. this is not always possible in a survey.

12. To confirm, the self-assessment is due in 2022, correct?

FSC requirements are applicable globally and relevant for all companies that carry the FSC certificate and put products with the FSC claim on the marketplace. To that extent, they are voluntary but are a mandatory requirement if the company wants to remain certified once the transition period is over.

13. Do we need to check the labour document to ensure that they align with the self-assessment?

The responsibility for conformity with the FSC requirements lies with the certificate holder, not with the sub-contractor. It is the responsibility of the CH to ensure that the subcontractor is following the requirements and include that in the self-assessment

14. If I have 3 sites in 3 different countries, do I need 3 self-assessments (one for each country) or it's sufficient if I put everything in one self-assessment document?

Yes, you can include all sites in one document, but considering that the sites are in 3 countries, we would strongly recommend maintaining 3 different self-assessments.

15. In the self-assessment, should the certified organization consider its suppliers of controlled wood?

If they are selling you CW material as certified organizations with a claim, then they need to get themselves certified against the requirements.

16. Is time dedicated to self-assessment review prior to the audit, considered part of the audit time?

That is something for certification bodies to decide, FSC cannot comment on that.

17. When you say country-specific self-assessments, do you mean the template, or will there be an example filled out like we're seeing in this presentation?

This refers to country-specific templates, with some information filled in it depends on the resources the local FSC offices have to fill in these details and how generic or specific they are.

18. Following the logic of the "FSC core labour requirements", why is not required for the certified organizations' policy of compliance with the "FSC Chain of Custody Certification standard" and a self-assessment of compliance with the standard as a whole to be sent before the audit to the CB? I consider the self-assessment one

more unnecessary task for the certificate holders and CB representing unnecessary costs.

The self-assessment is designed to reduce the time required in the final audit, not to be an unnecessary cost for the certificate holder or certification body. In the absence of a self-assessment, the auditor would need to check for conformity for all requirements. The self-assessment should answer most of those questions, along with the evidence. Without that, the auditor may need at least 50% more time to do the audit, check the records and undertake the interviews.

FSC Policy Statement(s)

19. Can a code of conduct include the FSC core labour requirements replace a new policy? Is it necessary to be written in the text according to FSC?

The standard is not prescriptive regarding the wordings of the policy, as long as they cover the requirements specified in the standard.

20. For each requirement, item f) can be fulfilled by the self-declaration from FSC-POL-01-004? Or do we need a new declaration?

The requirement regarding policy statement is " The organization shall adopt and implement a policy statement, or statements, that encompass the FSC core labour requirements. The policy statements shall be made available to stakeholders (i.e., affected and interested stakeholders) and to the organization's certification body."

21. Can the constitution and announcement of a policy statement be provided to stakeholders upon request, or does it need to be posted on the company website?

The policy statement needs to be made available on request to stakeholders, there is no mandatory need to upload it on the website.

22. Do we need to put all this information from the presentation in our policy statement?

No, the policy statement does not need all this information. The policy statement should be very brief, what we have here is the self-assessment.

23. Does FSC provide policy statement templates?

No, FSC does not provide policy statements, there might be samples in the guidance documents that we are developing. But ultimately, we do not want to be prescriptive.

National law and ILO conventions

24. If proof of legality is enough in some countries, why not just define a list of those countries from FSC as to where that is the case to save certificate holders and auditors time?

No, proof of legality is not enough. In some cases, and only in some cases that might be sufficient. Many of these requirements go beyond legal requirements. That is why we are using the self-assessments for companies to evaluate how best they meet the requirements and whether legal requirements already cover them. The next question is how the companies prove conformity to these requirements.

And no, we are not developing such a list, you would need to check whether the country has ratified the ILO Core Labour Conventions, are there regulations/laws in conformity with these conventions, and what is the level of compliance to these laws, proof of conformity will also be required.

Discrimination in employment and occupation

25. If the law establishes that the minimum age to work is 15 years old and the company has determined internally that it does not hire minors under 18 years of age, could it be considered discrimination?

No, if the law establishes the minimum age as 15, if the company regulates it as 18, that is not discrimination, since 18 years of age is still what is regulated by the FSC core labour requirements. Discrimination would mean putting someone at a deliberate disadvantage.

Freedom of association and right to collective bargaining

26. How many employees should we have when we develop a trade union?

There is no requirement regarding the number of members for a trade union (unless there is something governed by national or local law) The self-assessment does not need to consider any suppliers, even for CW.

27. If we do not have a union are, we still in conformity with this part of the regulations?

You do not need to have a union to comply with the requirements.

28. From the US, we have laws for the rights to organize. If we are not organized will the auditor attempt to encourage our employees to organize?

No, the auditor will not encourage your workers to organize. That is not the auditor's responsibility. Again, it is not mandatory for an organization to have unions, but the employer should permit freedom of association.

There is no requirement that would conflict with privacy laws, you need to verify compliance, but that need not be in violation of any such laws.

29. It would be helpful if you addressed how a non-union employer can comply with clause 7.5. Most US businesses are non-union.

Unions are voluntary and in situations, they do not exist one is not mandated to form one, only if workers decide to do so willingly. Clause 7.5 refers to Freedom of association, the organization needs to provide freedom of association that does not mean that there mandatorily has to be a union, or that employees need to be part of a union

Audit and surveillance evaluations

30. In the next audit, can the organization still present an internal audit of sites in the V-30 version of the standard? And later update these internal audits within the standard transition period?

Yes, until 31 December 2022 both version 3-1 and the previous version of the standard will be valid. After 31 December 2022, internal audits cannot be based on the previous version. All certificates must have transitioned to version 3-1 of the standard by six months after 31 December 2022 or they will become invalid.

31. The effective dates of the CoC standard (V3-1) containing these new core labour requirements are Sept. 1, 2021 - Dec 31, 2021. If an organization's annual audit is in October, can they wait to do the self-assessment in 2022, since that still falls within the implementation window?

Yes, it is possible to be audited as per V3-0 until December 2022. However, all certificates which are audited against V3-0 and have not transitioned to the new version by the end of December 2022, shall lose their certificate by the latest June 2023.

32. Tener una auditoria de responsabilidad social empresarial vigente en el año es suficiente para cubrir los requisitos de esta evaluacion? / Is having a current corporate social responsibility audit in the year sufficient to meet the requirements of this assessment?

No, however, you can use the relevant evidence you use for your corporate social responsibility audit to demonstrate conformity with the requirements.

33. If I choose to be audited against V3-1, the certificate, will be updated automatically?

Your certificate will reflect the standard you are audited against and will be issued/updated by your certification body.

34. Do the certification body auditor need to inspect the detailed labour documents, such as payroll, list of employees to ensure the certificate holders meet standard requirements or just only self-assessment is sufficient?

The self-assessment is the starting point for the evaluation. Depending on the self-assessment, the auditor can decide in what detail and what documents they need to check.

35. When is the transition period over?

Self-assessments are due before the audit. the new version of the COC standard becomes active from 01 September 2021, however, they are in a transition phase till the end of December 2022, until which both versions are active.

36. If both versions are active, does it mean we can arrange an FSC audit according to version V3-0?

Yes, during the transition period, you can be audited against either version. The transition time is for you to prepare for the new changes.

37. Next March 2022 we expect to be audited and I understand that the audit will be based on the Standard V3-1, so what will happen with the current certificate?

In March 2022, you can choose to be audited against V3-0 or V3-1. However, if you choose to be audited against V3-0, then you would need to transition to the new version latest by 6 months post end of the transition period. If you don't, the certificate will lapse.

38. If our audit is in October, and we choose to be audited to V3.0 in 2021 and V3.1 in 2022, are you saying our certificate will lapse because our implementation was audited less than 6 months before the end of the transition period?

If you are audited against V3-0 in 2022, then you need to transition to V3-1 latest by June 2023, or else your certificate will lapse. The transition period ends in December 2022, so your certificate issued against V3-0 will stay valid only for 6 months post that date.

39. My question is specific to Germany: According to a document provided by FSC Germany *(Aids and templates for the introduction of the PS and SD FSC core labour requirements_V1_4_OP_2021-08-09.docx)*. Against the background of the low risks in Germany, it appears sufficient to check conformity with FSC core labour standards only on an ad hoc basis. This means that a detailed audit is only deemed necessary in the following situations, for example, the organizations are rated negatively in the ITUC Global Rights Index; there are recent press reports or reports of incidents; there are observations of deviations during the audit and site visit; or similar. Question: Given the above statement is there, given a positive self-

assessment and no evidence of violations, a need to cross-check the documentation during the audit?

That is a decision that ultimately the certification body has to make, does the documentation and the evidence provided give enough confidence to do audits on an ad hoc basis. That is why we give that flexibility to the certification body to take that decision based on past experience with the client, the specific country conditions etc.

Recognition of other schemes

40. Can we use reports from ethical/social schemes?

Yes, the evidence used for other social compliance schemes can be used as evidence for the self-assessments.

Outsourcing and contractors

41. How about outsourcing that factory I have, should they follow these requirements?

The requirements apply to companies who act as outsourcers and subcontractors to FSC-CoC-certified organizations and should be included within the self-assessment

42. Does this mean that low-risk subcontractors must be audited?

Sub-contractors involved in FSC processes need to be included in the self-assessment, whether they need to be audited or not will depend on how clear the self-assessment is.

43. Is an outsourcer the same as a sub-contractor? What about the stevedores that load product at the port for a manufacturer?

Stevedores might be part of the outsourcers if they are covered by the outsourcing agreement (i.e., if the logistical service is part of the outsourcing agreement).

44. We have subcontractors, but we aren't sending them FSC boards. Do we have to assess and audit them to these labour requirements?

Sub-contractors also need to be covered by the self-assessment. The FSC core labour requirements apply to all parts of the FSC processes that are covered in the certificate scope, irrespective of whether they are covered in-house or outsourced. If the product carries the FSC claim, that means that the product conforms with FSC requirements in all aspects, including the conformity with core labour requirements.

45. Do we have to verify FSC-certified subcontractors or just non-FSC certified subcontractors?

Certification body auditors have the flexibility to decide the level of audit and the intensity with which they need to check for compliance to requirements. So, the more detailed and explicit the self-assessment is (along with ample evidence) the less is the need for the auditors to check for compliance in the field. It is possible in certain countries that compliance with legal requirements may be sufficient to prove compliance to some of these requirements. However, in any case, proof of compliance will still need to be provided.

46. Should we add all these requirements when we develop MoU with our subcontractor?

The sub-contractors should be made aware of these requirements, ideally, they should be included in the contract.

47. Even if it's an FSC-certified subcontractor do they need to hold themselves to the same standard?

No, FSC certified contractors do not need to be covered in the self-assessment, as they are already verified for compliance by their auditors, and they have their self-assessment.

48. The subcontractor language being discussed goes well above and beyond what is currently legal, used, and accepted in the US. This is going to be a large hurdle to overcome.

There are no requirements in the current standard which require you to go beyond legal requirements.

49. How are CHs expected to ensure the subcontractor is following the FSC requirements? Is their stated/written word enough, or do we as the CH need to audit them to verify their statements are accurate?

The certificate holder might need to verify that their contractors are meeting the requirements. Consider similar manner to quality verification, you do check that what your contractor is doing is legal and meets your quality requirements This might be done by audits, or by incorporating that in your legal contracts, or by inspection by CBs, you can use the similar mechanisms.

50. The questions that are to be asked of subcontractors, these questions may decline to be answered by the subcontractor or may be in conflict with privacy laws how are we to handle a situation such as this? What if the subcontractors decline to answer?

That depends on the nature of the questions. So, if the question is, "Do you employ workers below the minimum age?" and they refuse to answer, do you want to run the risk that that subcontractor is in violation of legal requirements which could potentially impact your business as well? The nature of your questions only needs to be restricted to conformity with the core labour requirements.

Miscellaneous

51. Will it be possible to get a copy of the PowerPoint as well?
Yes, a recording of the webinar would be made available on the Chain of Custody page on the FSC website. The previous webinars on this topic are already available at that location.

52. Can you send a summarized version of this chat Q&A to all registered participants?
We will publish a Q&A document which will also be made available along with the recording.

53. Will this example self-assessment be available post-seminar?
Yes, the PowerPoint will be made available.

54. I know it was mentioned that this webinar will be available on the FSC site, but will this PowerPoint itself be available for printing?
Yes, the PowerPoint will be made available.

55. To verify, are these requirements are needed for all companies solely operating in the United States as well?
These are global requirements, applicable to all countries however, evidence of conformance could include conformance to legal requirements in the country.

56. Are we seeing the new version, that is presented?
The FSC Core Labour Requirements are only in the new version. The Core Labour Requirements are part of V3-1 of the FSC CoC standard (the current version is V3-0). the self-assessment requirement is also part of V3-1. The new requirements come into effect from 01 September. However, till the end of 2022, both versions continue to remain active.