

SUMMARY OF STAKEHOLDER FEEDBACK FROM CONSULTATION ON FSC’S REGULATORY MODULE AND SYSTEM-WIDE CHANGES

This document presents some highlights from the public consultation on key topics of the FSC Regulatory Module and system-wide changes. The full Consultation Report will be published in July 2024.

FSC REGULATORY MODULE

FSC has developed the FSC Regulatory Module to assist FSC certificate holders in aligning their practices with Regulation (EU) 2023/1115 (EUDR) requirements. The FSC Regulatory Module is a complementary standard to add on to existing FSC certification requirements for forest management, chain of custody, project certification and controlled wood.

Relevant links:

- 
[Visit the Process page](#)
- 
[Watch a recording of the webinar](#)
- 
[EUDR Information](#)

CONSULTATION SUMMARY

A public consultation was held between 01 February and 01 March 2024. Six public webinars were held to review the draft content and answer questions from stakeholders.

Regulatory Module:

204

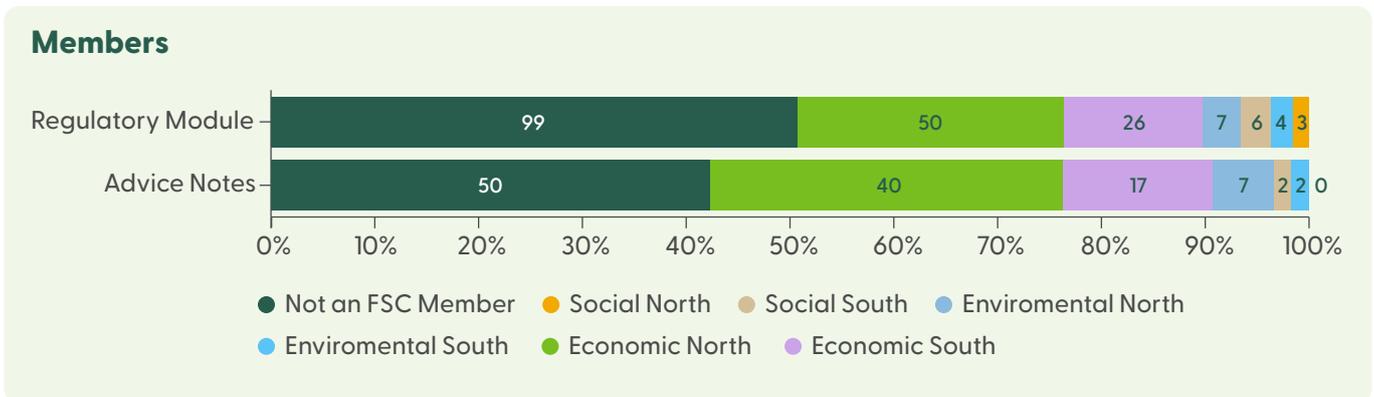
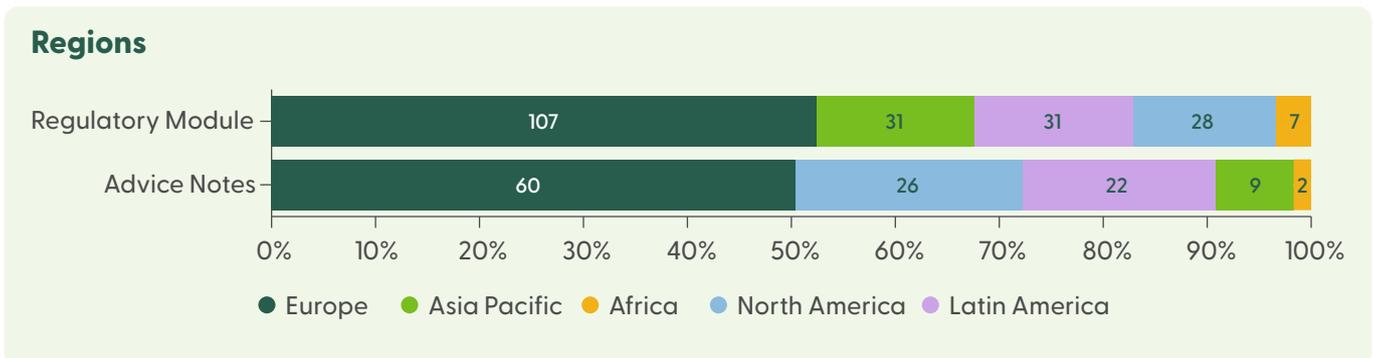
RESPONDENTS



Advice Notes:

119

RESPONDENTS





>55%

The majority of Certificate Holders and respondents from Europe and Asia Pacific found the Regulatory Module helpful

SUMMARY OF FEEDBACK ON FSC REGULATORY MODULE

ADDITIONAL CLARITY NEEDED

Feedback: Organizations not required to comply with EUDR need more clarity on expectations.

Response: FSC simplified the Regulatory Module for better clarity and added direct instructions for organizations not required to comply with EUDR in how to adopt the Regulatory Module

ADDITIONAL EFFORTS PERCEIVED BY CERTIFICATE HOLDERS

Feedback: Concerns about increased efforts and costs for implementing the Regulatory Module, including creating new systems and adapting IT.

Response: Acknowledging that EUDR compliance will incur additional costs, FSC will provide templates, technological solutions, and guidance to assist stakeholders.



SUMMARY OF FEEDBACK ON SYSTEM-WIDE CHANGES

ADVICE-20-007-24 DEFORESTATION-FREE PRODUCTS FROM FSC-CERTIFIED MANAGEMENT UNITS

Feedback: There was a split response regarding whether FSC-certified management units should be made deforestation-free as introduced in this Advice Note.

Response: FSC aligns more closely with EUDR requirements, focusing on limited conversion to agriculture and degradation, while still achieving the intent of the Advice Note.

ADVICE-20-007-02 CERTIFICATION OF PRIMARY FORESTS

The Advice Note has been revised to reflect the latest FAO definition of primary forests and to address EUDR requirements related to the conversion of primary forests to planted forests.

Feedback: Further clarity on Advice Note needed

Response: The Advice Note has been revised for clarity and purpose.

ADVICE-40-004-26 INCLUSION OF THE FSC REGULATORY CLAIM

The Advice Note provides instructions to non-users of the FSC Regulatory Module for establishing product groups with the Regulatory claim for the purpose of controlling the Regulatory output claim.

Feedback: Stakeholders mistakenly believed adjusting systems for the Regulatory Claim was mandatory.

Response: FSC clarified the Advice Note is voluntary, allowing certificate holders to decide on inclusion, which can aid clients' due diligence and reduce product mixing risk.