

FSC-DER-2023-006 Undertaking CoC Evaluations Remotely

Normative reference FSC-STD-20-011 V4-2, clause 2.7(c), ADVICE-20-011_10

Scope

- Generic
(applicable by all certificate holders)
- Specific
(applicable only upon individual request and PSU confirmation)

Approval 30 November 2023; Last amended 18 October 2024

Effective date 30 November 2023

Period of validity 31 December 2025;
To be reviewed 3 months' prior to its expiry

References

FSC-DER-2020-005
FSC-STD-20-011 V4-2, clause 2.7(c)
ADVICE-20-011_10

Request by CB The certification body (CB) requests a derogation for conducting desk audits for multiple clients located in Lebanon.

Rationale

The CB requests the possibility of a desk audit to avoid the travel of the CB's auditors from other countries (where the CB has its Local Offices) to Lebanon, since there are no local qualified FSC auditors for the CB in Lebanon.

Due to the unpredictability of the situation there, the International SOS (Health and security service firm) has increased its evacuation level for Lebanon to 'Full Evacuation' considering the situation in Israel and Gaza, and its possible impact on Lebanon.

Since October 7, military actions have occurred daily in areas surrounding the border between Israel and Lebanon increasing the risk of ongoing hostilities between Israel and the Lebanon-based Hezbollah movement expanding in intensity and geographical scope.

In that scenario, given locations linked to Hezbollah, urban centers, including the capital Beirut, and critical infrastructure, such as Beirut-Rafic Hariri International Airport (BEY, Mount Lebanon governorate) would face a credible risk of aerial attacks. These would prompt domestic airspace closure or render the airport inoperable.

The advice for Inbound business travelers of International SOS is as below:

- Defer all travel to Lebanon until further notice.
- Foreign nationals and business travellers currently in Lebanon should depart. International SOS has confirmed that commercial air travel options are available. International SOS can support with air charter evacuations, subject to a security assessment by the aircraft operator at the time of request and visa requirements at the passengers' destination(s).

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- Secure any vacated offices and residences and review security measures in place for local national workforce.
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PSU Conclusion

PSU grants the request for desk audits to replace on-site surveillance evaluations (for all applicants) and re-evaluation assessments (for low-risk applicants), due to the current safety risks to auditors and travel restrictions on travel in Lebanon, and areas of Israel and the Occupied Palestinian Territories, due to the current conflict in the region.

This derogation shall only apply to surveillance evaluations and re-evaluation assessments (for low-risk applicants) to be conducted for any existing certificate holders with operational sites located in:

- Lebanon; or
- Parts of Israel and the Occupied Palestinian Territories, including:
 - West Bank; and
 - Gaza Strip

This derogation is not applicable to main evaluations.

Preconditions for Re-evaluation Assessments

For applicants with 'low' risk (see Annex A), the certification body (CB) shall undertake the re-evaluation assessment as a desk audit.

The CB shall conduct a risk assessment for each applicant according to the scenarios/factors provided in **Annex A** to determine the option of conducting desk audits for re-evaluation assessments.

The risk assessment is to be undertaken at the level of a single site and not at the certificate level. For multi-site certificates, the risk assessment shall be undertaken for each participating site (or for each site selected by sampling) prior to the re-evaluation assessment audit.

When an applicant falls into more than one risk category, the CB shall adopt the precautionary approach and apply the higher risk category.

For applicants that would be considered 'medium' or 'high' risk (see Annex A), CBs shall provide additional requested information to FSC for a separate derogation to be considered for re-evaluation assessments on a case-by-case basis.

The additional information to be provided to FSC for assessment should include, but is not limited to:

- Certificate scope
 - FSC product groups;
 - FSC sales (Annual Volume Summary);
 - FSC stock on-site
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Annex A: Risk determination for undertaking remote re-evaluation assessments

Scenario	Low risk	Medium risk	High risk
Traders	<ul style="list-style-type: none"> without physical possession with physical possession, but restricted to storage/trading in finished and labelled products 	<ul style="list-style-type: none"> With physical possession and trading in unfinished/non-labelled products 	
Primary and secondary producers/processors/printers and related services	<ul style="list-style-type: none"> Exclusively handling certified products made of single input material (e.g., whole site deals with FSC 100%) All inputs to production are eligible inputs according to Table B in FSC-STD-40-004, only transfer system is used and physical segregation is not required 	<ul style="list-style-type: none"> Use of either percentage or credit system with/without multiple product groups 	<ul style="list-style-type: none"> High complexity with management and uses of all control systems.
Non-eligible input entering the supply chain	<ul style="list-style-type: none"> Risk mitigated by temporal separation of material 	<ul style="list-style-type: none"> Risk mitigated by identification of material Risk mitigated by physical separation of materials if mitigation can be verified by real time video 	<ul style="list-style-type: none"> Risk mitigated by physical separation of materials
Contractors/outsourcing activities	<ul style="list-style-type: none"> Low risk contractors or High-risk contractors with low risk categorization as per Clause 9.3 of FSC-STD-20-011 	<ul style="list-style-type: none"> Low risk contractors but with identified risk of improper additions or mixing by the contractors at the contracting facility 	<ul style="list-style-type: none"> High risk contractors as defined in Clause 9.2 of FSC-STD-20-011
Sourcing reclaimed materials	<ul style="list-style-type: none"> Supplier audit program undertaken by another FSC accredited CB 	<ul style="list-style-type: none"> Reclaimed material classification can be demonstrated through objective evidence upon receipt. 	<ul style="list-style-type: none"> Supplier audit program undertaken by applicant organization <i>and</i> reclaimed material classification

through objective evidence not possible.

<p>Sourcing CW through implementation DDS as per requirements of FSC-STD-40-005 standard</p>	<ul style="list-style-type: none"> • Low risk of origin, <i>and</i> • Low risk of mixing 	<ul style="list-style-type: none"> • Specified risk for origin (mitigation measures do not require field level verification) <i>and</i> • Low risk of mixing 	<ul style="list-style-type: none"> • Specified risk for origin (mitigation measures require field level verification) <i>or</i> • Specified risk of mixing that can be mitigated only by physical separation.
<p>Group and multi-site certification (Central office requirements may be evaluated in the same manner as a single site)</p>	<ul style="list-style-type: none"> • Normal risk** participating site 	<ul style="list-style-type: none"> • High risk participating site* which meets remote audit requirements for reclaimed materials sourcing, CW sourcing and for contractors 	<ul style="list-style-type: none"> • High risk participating site*.
<p>Other risk factors</p>		<ul style="list-style-type: none"> • Custom manufactured products with individual conversion factors • Project certification 	<ul style="list-style-type: none"> • Unresolved complaints/disputes regarding the organization's conformity to the requirements of FSC standards

***High-risk participating site:** A participating site operating a controlled wood verification program or due diligence system according to FSC-STD-40-005, a supplier audit program for reclaimed materials according to FSC-STD-40-007, or high-risk outsourcing to a non-FSC-certified contractor.

****Normal risk participating site:** A participating site that does not conduct any of the activities considered 'high risk' above.